



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

QQI COMPREHENSIVE POLICY DEVELOPMENT PROGRAMME

SUBMISSIONS

WHITE PAPERS

WHITE PAPER

Re-Engagement with Legacy
Providers: Overarching Policy

WHITE PAPER

Policy and Criteria for Further
Education and Training Legacy
Voluntary Providers Continuing
Access to Validation Leading to
QQI Awards

WHITE PAPER

Policy and Criteria for Higher
Education and Training Legacy
Voluntary Providers Continuing
Access to Validation Leading to
QQI Awards

SUBMISSIONS

QQI received submissions by email from the stakeholders listed below.*

- » ACCESS
- » AONTAS
- » Canal Local Employment Service
- » Children's Therapy Centre
- » Higher Education Colleges Association (HECA)
- » Institutes of Technology Ireland
- » Irish Congress of Trade Unions
- » The Irish Institute of Training and Development
- » Irish Steiner Kindergarten Association
- » Irish Trainers Network (ITN) – QA Services clients and members
- » Irish Universities Association
- » Joint Managerial Body (JMB) – Association of Community and Comprehensive Schools (ACCS)
– *joint submission*
- » Limerick and Clare Education and Training Board
- » Longford Women's Link
- » National College of Business Administration
- » The National Disability Authority
- » Respond! College
- » Skillnet Network Managers – Certification Group
- » South East Community Training & Education Centre Ltd.
- » SQT Training Ltd
- » Warrenmount Community Education & Development Centre
- » YMCA Ireland

**Please note the responses on the following pages appear as received and have not been proofed/edited by QQI.*

SUBMISSION BY:

ACCESS

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ACCESS Community Education Project

Submission on behalf of ACCESS Community Education Project in response to the White Paper on Policy and Criteria for Further Education and Training Legacy Voluntary Providers Continuing Access to Validation of Programmes leading to QQI Awards.

We feel strongly that –

- A) **Community/Voluntary Sector organisations** should be treated in the same way as other voluntary providers as outlined in page 3 of the White Paper. These providers are not for profit organisations working in the main with the most marginalised and vulnerable groups.
- B) The fees for **QA should not** be applied to this group as was previously the case under FETAC
- C) The fees for **Programme Validation should not** be applied to this group. In many cases these providers may only be delivering a small number of programmes annually but none the less the impact of these programmes on the participants availing of them is significant and must not be underestimated.
- D) Funding streams available to these groups are for specific programmes and do not allow for or take into account fees for QA, Programme Validation etc.
- E) This is the **Department of Education & Skills, QQI** imposing exorbitant fees on a very small under-funded community & voluntary education and training sector and is essentially an additional source of revenue for the government.
- F) **FETAC providers** have already agreed **QA Policy and Procedures** and been subject to in many cases strict monitoring of same, why then do legacy voluntary providers have to re-engage in this process?
- G) No details given in the White Paper about commencement time for this process, length of time this process will take etc. At present programme validation is taking in excess of 26 weeks to receive initial feedback.

Marian Donegan

Project Co-ordinator ACCESS Community Education Project Wexford



SUBMISSION BY:

AONTAS

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AONTAS Community Education Network Submission to the Quality and Qualifications Ireland (QQI)

9th May 2014

I. QQI White Paper: Re-Engagement with Legacy Providers: Overarching Policy

II. QQI White Paper: Policy and Criteria for Further Education and Training
Legacy Voluntary Providers Continuing Access to Validation of Programmes
Leading to QQI Awards

Contact: Niamh O'Reilly

Head of Membership Services

AONTAS, 2nd Floor, 83-87 Main Street, Ranelagh, Dublin 6

Introduction

The AONTAS Community Education Network¹ welcomes the opportunity to engage in the QQI consultation process and this submission represents its commitment to the process. The paper outlines the main issues for community education organisations in order to shape QQI policies and procedures for the benefit of community education learners.

¹ The AONTAS Community Education Network comprises over 100 independently managed community education organisations which work collectively to gain recognition for community education, raise its profile and lobby to ensure it is adequately resourced.

This submission outlines the concerns of the AONTAS Community Education Network with regard to:

- I. QQI White Paper: Re-Engagement with Legacy Providers: Overarching Policy
- II. QQI White Paper: Policy and Criteria for Further Education and Training Legacy Voluntary Providers Continuing Access to Validation of Programmes Leading to QQI Awards

The key areas of concern for the AONTAS Community Education Network with regard to both White Papers are:

1. Proposed fees for re-engagement of legacy providers
2. The proposed idea of consortia for Quality Assurance purposes
3. The process for the evaluation of provider capacity for approval of QA.

White Paper: Re-Engagement with Legacy Providers: Overarching Policy

The main issue with this White Paper for members of the Community Education Network is the proposed fees for QA approval.

2.5 Fees for Approval of QA (page 7)

A fee will apply for the approval of a provider's QA procedures.

The exact fee for the re-engagement process for legacy providers is unclear in the Fees Schedule October 2013, however it could be estimated as €5000, in line with section *1.1 Fees for the submission of quality assurance procedures for approval in respect of new providers (Section 80, a)*.

As voluntary providers (page 5: 1.2.2) encompass a diverse range of providers including for-profit providers, we strongly urge that no fees for re-engagement be applied to not-for-profit community/voluntary organization.

Not-for-profit education providers should not be required to pay QQI fees for re-engagement because:

- They attract the most hard to reach learners who would not generally engage in formal adult education
- Community groups are already underfunded and engage in education provision that is unprofitable for private providers as they offer extra supports e.g. outreach and learner supports

- It will further disadvantage learners who are least likely to engage in accredited learning which is counterproductive to achieving national policy agendas regarding upskilling, particularly for the unemployed and those at the lower levels of the NFQ
- Funding for community education groups generally covers contact hours only; therefore, there are no extra funds available for fees. Furthermore, much of the funding for community education is contingent on the ability to deliver accredited training. Diminishing such capacity will be a threat to the basic sustainability of community education. In addition, much of the quality assurance or validation work is carried out through voluntary hours by organisations.

SOLAS has committed itself to developing a Further Education and Training system which is learner centred. The aspiration to create a seamless system in which access, transfer and progression onto the National Framework of Qualifications a reality is laudable. However it is important to recognize the need for a diversity of FET provision which ensures that those individuals who are most distanced from the education system are supported to engage. With this backdrop the role of community education comes to the fore, it has a history of effectively engaging the most hard to reach through its approach: outreach work, the non-threatening, welcoming environment; the learner supports; the specific learning methodology; and its location in, and knowledge of, the community. Learners who do not participate in courses delivered by statutory providers, or who may require the kind of provision that is unprofitable to private providers, can take the step into learning through community education. The number of learners that a community education organization engages cannot be compared to formal adult education, as most learners are from hard to reach groups and require a range of supports to build up their capacity to participate and complete an accredited course.

One of the most important developments in recent times has been the ability of community education providers to offer accredited courses which allow learners to take that step towards achieving a full award, to progressing to further accredited learning and ultimately secure employment. For example: Disadvantaged learners with the lowest level of qualifications are the main cohort of community education learners. The attraction of community education is its strength for engaging learners, however it is one of the most underfunded the FET system. Community Education providers are already struggling to provide a service to their community and learners. To propose a fee for the re-engagement of legacy community education providers, who are an underfunded part of FET and attracts the most hard to reach learners, is discriminatory.

From a learners' perspective, in order to support their ability to participate in accredited learning, their first step back is the most crucial. Community education, and minor (component) awards from level 1-5, allows learners to make the transition to accredited learning and act as the building block for further accreditation attainment. However, community education organisations will not be able to access accredited programmes through the QQI if a fee is applied for re-engagement.

White Paper: Policy and Criteria for Further Education and Training Legacy Voluntary Providers Continuing Access to Validation of Programmes Leading to QQI Awards

The main issue with this White Paper for members of the Community Education Network is:

1. The proposed idea of consortia for Quality Assurance purposes (page 6)
2. The process for the evaluation of *provider capacity* for approval of QA (page 9).

[The proposed idea of consortia for Quality Assurance purposes \(page 6\)](#)

As the new QQI QA may include extra requirements in order to achieve QA, there is a possibility that this will impact on the ability of legacy providers in meeting alternative processes requirements. For example on page 6: *Existing providers may also choose to consider satisfying the requirements for meeting QQI QA criteria through consortia or networks. QQI is currently considering and analysing how such arrangements might be accommodated.*

The consortia idea has been explored to some extent by the CEN (based on how some organisations came together as a consortium to share programmes). However the development of consortia for community education groups is challenging as they do not have the infrastructure to readily engage in/create this process. Furthermore, this work needs resources which in the case of community education groups they do not have, in terms of time or personnel to engage in a collaborative process that is time intensive/need to find suitable partners etc. Also, it is important for community education organisations to have the opportunity to maintain their own QA in terms of autonomy of provision, both through its tutors and as it is oftentimes a requirement of their funding schemes.

[The process for the evaluation of provider capacity for approval of QA \(page 9\)](#)

Legacy providers in the AONTAS Community Education Network are committed to providing high quality programmes for their learners and are in agreement that quality assurance policies must enable learners to achieve intended learning outcomes in a well-supported learning experience. Legacy providers have previously adhered to the QA criteria for FETAC and welcome the opportunity to ensure their practice meets the new standards of the QQI. However, it is unclear from the White Paper how the evaluation of FET legacy voluntary providers will be carried out.

On page 9, it states that:

'All FET legacy voluntary providers had a QA agreement with the FET Awards Council. In conducting the evaluation of providers' QA procedures, QQI will take into account the FET legacy voluntary providers' prior QA agreement with the FET Awards Council. The QA agreement with the FET Awards Council was based on the establishment of provider QA procedures. Accordingly, the emphasis of the evaluation will be on the implementation of fit-for-purpose QA procedures and provider capacity rather than the existence of the procedures per se. In carrying out the evaluation, QQI may use evidence generated through prior engagements with the FET Awards Council, gleaned through programme validation, monitoring and certification.'

In terms of provider capacity, due consideration must be taken for community providers who have previously met the standards of FETAC QA, have engaged in the monitoring process with FETAC, and who provide quality assured accredited programmes. The process for evaluating the capacity of groups should be fair and consistent with the main focus being on the learner's experience, rather than a comparison between providers. Community education groups may engage fewer learners than formal education providers however this does not imply that the QA standards are of a different standard.

The proposed requirements for assessing providers included in the Green Paper were:

- 1. Sole purpose/core business of the applicant is the delivery of education and training.**
2. The applicant is an established education and training provider for a specific period
3. of time e.g. two years.
- 4. A minimum number of learners will achieve awards annually.**
5. Providers that are located in areas with limited current available provision of NFQ
6. awards. (Green Paper, p.8)

Community education organisations provide a variety of other services and therefore meeting the requirements of the first point would be difficult. Furthermore, in point 4, a proposed minimum number of learners would be problematic for community education groups as their work cannot be viewed in terms of the number of learners but the progression of learners who are most hard to reach.

Conclusion

The AONTAS Community Education Network is committed to continued engagement with the QQI and welcomes the opportunity to shape their future policies.

SUBMISSION BY:

Canal Local Employment Service

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Canal Local Employment Service

Submission to the QQI in relation to fees structure for registration and Validation of courses:

The proposed fee structure will have a detrimental effect on the delivery of Adult & Community Education through the Voluntary and Community Sector.

As a Local Employment Service working in a particularly vulnerable area it has always been our objective to bring education to the local community in a realistic and holistic manner. This process enables learners to confidently achieve certification and progress to the mainstream education system following our intervention. The outcome of our involvement improves learners' employment prospects through education and also improves community expectation of academic success.

The proposed fee structure is beyond the reach of the Voluntary & Community sector. The sector is based in disadvantaged communities and therefore the fees structure will take Education and Training opportunities beyond the reach of the most vulnerable having the effect of reversing the positive progress and achievements we have made over the past 12 years.

Evelyn Lane

Centre Director

Janet Shanks

Training and Employment Mediator

Canal Local Employment Service
Goldenbridge Integrated Complex
Vincent Street West
Inchicore
Dublin 8

SUBMISSION BY:

Children's Therapy Centre

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Children's Therapy Centre

Hi,

Some thoughts on your White Paper re HET Legacy providers:

Although this is just a White Paper it gives very little concrete details to respond to and no clear indication of when the new Guidelines and Criteria will be published.

- I am interested in receiving details of what the differences between the former HETAC guidelines and the new QQI guidelines will be. It would be helpful to receive this in hard copy as soon as it is available. It might even be useful to host a consultation day to present and discuss the differences
- Likewise, I am interested in learning how much face to face contact will be involved in the 'communications process' for the ending of the transition period and the approval of QA procedures with legacy providers.
- I am also curious about the proposed 'new approaches....such as consortia or networks'
- Cost of approving QA (region of €10000) seems to be very high
- I am also curious about the references to 'scope of access granted' on p.5 of the document. What does this mean?

In conclusion, I am hoping that face to face sessions for legacy providers will take place to disseminate the details that will only become available in the 'Gap analysis' document and in the final criteria.

Regards,

Eileen Prendiville
Children's Therapy Centre
Tír Na nÓg
Slievenagorta
Ballymore
Mullingar
Co Westmeath
Ireland

SUBMISSION BY:

Higher Education Colleges Association (HECA)

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HIGHER EDUCATION COLLEGES ASSOCIATION (HECA)

RESPONSE TO QQI WHITE PAPER

POLICY AND CRITERIA FOR HIGHER EDUCATION AND TRAINING LEGACY PROVIDERS CONTINUING ACCESS TO VALIDATION LEADING TO QQI AWARDS

As a general comment, HECA feels that there is a considerable amount of ambiguity in this White Paper due to a lack of specific detail in outlining the different processes and procedures referred to.

HECA would like to stress that the timing of re-engagement, and the dovetailing of the re-engagement process with the implementation of the IEM, is a matter of significant concern to HECA members. HECA seeks discussion and clarification on the proposed sequencing and timescale with regard to these matters as a matter of urgency.

HECA is also concerned by the statement on Page 3 (also in the Overarching Policy); *“QQI has not adopted the concept of a “registered provider” as defined by the former awards councils”* which gives rise to the question how does QQI wish providers to be considered? Has QQI devised a form of wording to replace that of “registered provider”? HECA is of the view that the loss of “recognised provider” status devalues the considerable work and cost required to agree and maintain QA under the QQI system.

The amalgamation of approach with regard to programmes of Higher Education and Further Education for providers who operate both, (with the Higher Education White paper taking precedence), seems prudent and efficient.

As detailed in our response to the White Paper on the ‘Overarching Policy’, clarification/definition of the terms ‘criteria’, ‘procedures’, ‘guidelines’ is essential, as is an understanding of the processes implied, e.g. procedure for the agreement of time scales.

Section 1:

Objective 1 – This objective sets out for consultation the ‘proposed QA QQI Guidelines and Criteria for QA’. However, the paper does not include specific guidelines and criteria, rather an overview of where the guidelines and criteria will be drawn from (outlined in Section 2.1). While HECA welcomes that the new Guidelines and Criteria will be based on the existing Guidelines and Criteria (i.e. those of HETAC) it would ask to be consulted on any proposed additions and/or modifications.

Objective 2: HECA is in agreement with this objective.

Objective 3: HECA would welcome further insight and clarification as to what is intended by (i) *“voluntary providers’ particular obligations and entitlements based on their particular status”* and (2) the statement *“Provider Lifecycle of Engagements is intended to highlight the providers’ wider responsibilities as a member of the national and international training community”*.

Objective 4: HECA seeks clarification on issues of capacity with respect to some providers not meeting new criteria for re-engagement with QQI.

Section 2

It is difficult to comment without seeing the proposed “criteria, guidelines and procedures” referred to.

HECA welcomes QQI’s stated intention to publish the differences between the former Guidelines of the HET Awards Council and the new QQI Guidelines and Criteria.

Regarding Page 7, Policies and Criteria, QQI Guidelines and Criteria for HET Legacy Voluntary Providers, will all institutions be issued with Guidelines and Criteria simultaneously or will they be issued piece meal, which could lead to possible disadvantage among providers?

In relation to Page 9, *“instances where identified risk factors (e.g. volume provision), mean that the expiry date should be brought forward to encourage providers to seek QQI QA approval”*, HECA members would like to know does “volume of provision” refer to the number of programmes offered, or to the number of students enrolled on programmes. Also, who will be identifying the risk factors, and on what basis will they be determined?

HECA would also like assurances that dates would be set in consultation with providers rather than arbitrarily as QQI may not be aware of demands on providers at any given time, e.g. extent of engagement a provider may have with other State Agencies such as the Teaching Council.

HECA is reassured and appreciative that full recognition will be given to the outcomes of previous statutory reviews, (with particular focus on positive outcomes), and would ask that consideration will also be given to subsequent work completed to date by providers.

HECA is of the view that the timing of the transition period i.e. the date that the Re-Engagement Policy takes effect and the date of completion of the Re-engagement Review process at which stage the provider becomes re-engaged by QQI, could be problematic: HECA understands that no new programmes will be validated for a provider during the transition period. HECA suggests a solution worth exploring is that the re-engagement policy might be promulgated to take effect after a transition period, long enough to allow for a re-engagement review of **all** providers.

With regard to the fee to be applied for the re-engagement process, HECA has already written to QQI on the general matter of fees and awaits answers to the concerns raised. With regard to the fee for QA approval, (i.e. re-engagement), HECA requests clarification as to whether or not the same fee is to be applied to all providers irrespective of the amount, level and complexity of engagement that will be required for the re-engagement process.

Page 11 states that for those providers who did not go through an IR review, QQI will undertake an evaluation against “published criteria”. What ‘published criteria’ will be used? Is it the HETAC criteria or something different?

Page 11 also mentions that QQI will allow resubmissions on QA procedures but not on programme validations. HECA feels that there should be a consistency of approach across all processes and that resubmission should also be considered for programme validations.

With regard to the process of making a new application to QQI, mentioned on Page 12, who determines the “prescribed time interval” and on what basis?

An appeals procedure is also mentioned and HECA would like information on the status of a provider and its programmes while an appeals process is on-going.

HIGHER EDUCATION COLLEGES ASSOCIATION (HECA)

RESPONSE TO QQI WHITE PAPER

RE-ENGAGEMENT WITH LEGACY PROVIDERS: OVERARCHING POLICY.

HECA members, while considered ‘legacy providers’ under the 2012 Act have had ongoing and robust relationships with HETAC and its predecessor the NCEA. Under these regimes, HECA members worked hard to collaborate with those accrediting bodies to build capacity and robust QA arrangements. All concerned, including awarding bodies, have benefited from that work and as such HECA members are of the view that this investment should not be overlooked in the current transition.

HECA believes it is essential that all providers covered by the 2012 Act be treated in a consistent, fair, equitable and transparent manner with regard to the implementation and operation of QA arrangements. In respect of this, HECA disputes the differentiation being made between “Obligatory” and “Voluntary” providers. The criteria for participation in any State-aided scheme include having awards on the NFQ. You cannot participate otherwise. In this sense participation for private providers is obligatory, not voluntary. Further, the differentiation being made results in a fragmented approach within which HECA members could potentially be viewed, by those who do not understand the context, as in some way inferior higher education providers. HECA does not see or understand the necessity for applying the “Obligatory”/ “Voluntary” classification and would seek its removal in the interest of equity.

HECA notes that QQI’s approach to re-engagement for the “Obligatory Providers” is based on a “collaborative development of new QA guidelines”. HECA believes that its members should be afforded the same collaborative approach to ensure equal treatment with “Obligatory Providers”.

If the non-collaborative approach to “Voluntary Providers” is applied to HECA members, it could result in the re-engagement process being delayed, which could further result in delays in

programme validation due to the absence of agreement of QA processes. In that event, HECA members would be at a serious competitive disadvantage in relation to “Obligatory Providers”. HECA would urge QQI to treat all HEIs in the same manner.

HECA is of the view that there is a great deal of ambiguity in the papers with terms such as, “policy”, “criteria”, “procedures”, and “guidelines” used throughout without definition and interchangeably. Clarification on these terms is essential, as is an understanding of the processes implied, e.g. procedure for the agreement of time scales.

Similarly a full evaluation of the proposed re-engagement process can only be made when the proposed QA guidelines and associated criteria have been published. It is unclear from the current paper if the proposed policy, criteria and QA Guidelines (for all provider types) will be published for consultation. HECA would welcome the opportunity to review and comment on all documentation. Further the paper does not explain the timeline for publication and implementation of QA guidelines for all the provider types (Obligatory and Voluntary). Will all guidelines be issued simultaneously? If not, can QQI offer assurance that HECA members will not be disadvantaged by a staged publication process?

HECA is in agreement with the aim in the White Paper to *“operate engagements that add value to providers rather than acting simply as regulatory gateways”* and the intention of facilitating providers to *“demonstrate that they can act autonomously in developing programmes and assessing learners”* and assisting them to *“demonstrate continuous self-evaluation to achieve a strategic focus on enhancement and educational development”*.

HECA would welcome further explanation of some of the proposed re-engagement strategies/concepts detailed in the White Paper for various provider types. For example:

“Guidelines and other policies such as for DA with respect to Teagasc, BIM and Failte Ireland” – does this suggest access to DA or similar arrangement for these bodies over time?

“The QA procedures and capacity of some legacy providers may not meet QQI QA criteria”, what will be the decision-making criteria and process for this determination? Are providers who might be affected by this currently aware of the matter?

Page 4 refers to *“Previously Established Universities (PEUs) and the QA procedures between PEUs and their linked providers”*. HECA is strongly of the view that differentiation should be made

between Universities with, and Universities without, linked providers. Those with linked providers should be required to clarify how such linked providers are quality assured.

HECA is also concerned at the statement on Page 5, Paragraph 1.2.2; *“QQI has not adopted the concept of a “registered provider” as defined by the former awards councils”* which gives rise to the question, how does QQI wish providers to be considered? Has QQI devised a form of wording to replace that of “registered provider”? HECA is of the view that the loss of “recognised provider” status devalues the considerable work and cost required to agree and maintain QA under the QQI system.

With regard to the fee to be applied for the re-engagement process, HECA has already written to QQI on the general matter of fees and awaits answers to the concerns raised. With regard to the fee for QA approval (i.e. re-engagement), HECA requests clarification as to whether or not the same fee is to be applied to all providers irrespective of the amount, level and complexity of engagement that will be required for the re-engagement process.

In general it is not fully clear if the proposed re-engagement process replaces the Institutional Review process (IR) required under the 1999 Act and which some members would be required to complete in 2014/15. If the proposed re-engagement is indeed a full replacement of the requirement for IR, then could this be stated more clearly.

SUBMISSION BY:

Institutes of Technology Ireland

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QQI Comprehensive Policy Development Consultation – Submission of IOTI re May 2014 documents

1. White Paper on Re-Engagement with Legacy Providers: Overarching Policy

IOTI is broadly supportive of the overarching policy approach for QQI's re-engagement with legacy providers, which makes provision for the re-engagement of the IoTs with QQI as one of the 'obligatory provider' groups. IOTI notes that the re-engagement policy will commence when QQI issues relevant quality assurance guidelines, following consultation with the institutions. In this connection IOTI and the individual IoTs look forward to engaging with QQI on the development of the QA guidelines and the subsequent development of a process for approving the IoTs' quality procedures. IOTI also looks forward to discussing QQI's vision for articulating that 'lifecycle of engagements' that it will maintain with each IoT.

IOTI acknowledges that there are different categories of providers with whom QQI will re-engage and that there will be a statutory requirement to develop guidelines and approval mechanisms appropriate to each group. However, IOTI also considers that there should be no substantial differences between the guidelines issued to the various categories of obligatory provider in the public HE sector – whether these be PEUs, the other DABs and the IoTs with DA – given the efforts that are underway to develop the HE sector at system level, and ensure that it is a coherent system that encourages collaboration between providers in regional and other types of cluster. In this regard, IOTI would call on QQI to consider putting in place a mechanism to enable some system level consultation to take place on the development of the QA guidelines. This would be in line with the public utterances of QQI to treat the IoTs with DA in a broadly similar fashion to the DABs, which, in turn, recognises the reality that all the public HE institutions have trodden a broadly similar QA path over the past decade or so, in the context of implementing the Standards and Guidelines for Quality Assurance in the EHEA. It would also support and reaffirm the engagement that is taking place between public higher education institutions at local and regional level.

IOTI notes that a fee will apply for the approval of a provider's QA procedures. IOTI looks forward to discussing the arrangements to be put in place for levying professional fees from its member institutions ahead of the implementation of the approval process. IOTI would reaffirm the need to ensure that a fair and transparent system of fees – based on the funding arrangements that are in place for public HE institutions, rather than on the categorisation of institutions in accordance with the 2012 Act – is established.

2. White Papers on Continuing Access to Validation of Programmes for FET and HET Legacy Voluntary Providers

IOTI notes the publication of the above White Papers. Having reviewed the papers, IOTI does not consider it appropriate to comment in any detail on either policy as they do not apply to IOTI member institutions. IOTI does consider, however, that the approaches set out in each paper are motivated by the desire to ensure that all providers are operating effective QA procedures that will encourage public confidence in the quality of the education and training system. IOTI considers that the implementation of these approaches would achieve this end and is therefore broadly supportive of them.

SUBMISSION BY:

Irish Congress of Trade Unions

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Irish Congress of Trade Unions

I am writing on behalf of the Irish Congress of Trade Unions, including our affiliated unions that have been providing both FETAC and HETAC-certified training, in response to QQI's recent publication of the three White Papers on Re-Engagement with Legacy Providers (overarching policy, HET continuing access and FET continuing access).

Congress welcomes the on-going consultative process being pursued by QQI and affirms its commitment to engage in this process. We also wish to note formally our interest in continuing to provide training that is certified via the new QQI structures.

We have had the opportunity to meet with QQI in recent weeks and have explained the variety of interests we have in this area. On the one hand, Congress and its affiliated unions uniquely provide training for the trade union movement covering a range of relevant subject areas and addressing the training needs of representatives in various forms (shop stewards, equality officers, health and safety representatives etc.), professional trade union officers and senior management and leaders within unions. Congress is also the sponsoring and coordinating organisation for the network of centres for the unemployed that operate throughout the country, the Congress Centres Network (CCN), many of whose members are FETAC providers in their own right. Each member of CCN is an autonomous organisation, with its own legal structure established as a non-profit company limited by guarantee.

In responding to the re-engagement process, different challenges exist for each of these Congress interests. Notwithstanding the difficulties that Congress has previously expressed in relation to proposed fee policies, we are prepared to explore ways in which we can respond positively to the re-engagement process

In relation to trade union providers, there is consultation and planning underway at the moment to create a single trade union or workers' college which would take over the provision of training currently being provided by separate unions. The unions involved have indicated their willingness in principle to work as a consortia with QQI in this context and to move towards have a common QA approach under a single trade union provider. This is subject to formal approval within each of the unions concerned but all have undertaken to pursue this.

CCN is also prepared in principle to explore how a consortia arrangement for QA purposes might be put in place for its sector. However there are, in our view, significant challenges to be addressed and a considerable amount of dialogue, both within the network, with Aontas and with QQI, will be necessary to arrive at solutions that will address the needs of all concerned.

Congress will reflect on the timescale necessary for these separate tracks and will be happy to liaise with QQI as we proceed.

Frank Vaughan

Director of Learning

Irish Congress of Trade Unions

SUBMISSION BY:

The Irish Institute of Training and Development

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THE IRISH INSTITUTE OF TRAINING & DEVELOPMENT

POLICY AND CRITERIA FOR FURTHER EDUCATION & TRAINING LEGACY VOLUNTARY PROVIDERS CONTINUING ACCESS TO VALIDATION OF PROGRAMMES LEADING TO QQI AWARDS

A revision of the existing QA requirements as an integral part of the re-engagement with legacy providers is timely and welcome. This process will have a significant impact on meeting the objective of enabling learners to achieve intended learning outcomes and provide them with a well-supported learning experience.

That the QA procedures and capacity of some FET legacy voluntary providers may not meet QQI QA criteria should not be viewed negatively; rather it is an inevitability of the continuous improvement in the education and training system and, for large numbers of providers, re-engagement will be about improving still further their high standards of practice.

While QQI does not exist to regulate or protect the education and training system, if it is deliver on its commitment to ensure that providers are operating effective QA procedures that will encourage public confidence in the quality of the education and training system, it will need to acknowledge its obligation to implement a robust, comprehensive monitoring system for those providers who successfully re-engage.

The acknowledgement that existing providers may choose to consider satisfying the requirements for meeting QQI QA criteria through consortia or networks is reasonable and welcome but will bring significant challenges. QQI's analysis of how such arrangements might be accommodated must give due consideration to the ethical requirements of any such arrangement. The scale of collaborative certification activity must not be seen by any agent as a profit-making exercise. However, if 'lead providers' are to assume responsibility for overseeing fit for purpose, QA procedures and qualitative programmes of second providers, which deliver positive learner outcomes, a resource requirement will become an inevitability. Any collaborative arrangements could carry the risk of disproportionate remuneration of such activity being passed on to the learner and QQI should consider developing guidelines in this regard.

Greater clarity would be welcomed in relation to the conditions under which legacy providers who are engaged in the process of seeking QA approval can engage in the validation process. The document states that

'Following the publication of the guidelines and criteria, applications by providers for programme validation will only be accepted by QQI where they are accompanied or preceded by an application for QA approval'.

The document also states that

'Approval of QA procedures by QQI enables a provider to apply to QQI for programme validation within the scope of access granted'.

It is unclear from these two statements whether an applicant submitting a programme for validation must have successfully approved their QA procedures, or whether it is sufficient to have made a submission for QA approval.

In light of the above requirement, the clarity for applicants around timelines will be essential. It is acknowledged that QQI is an evolving organisation and is subject to the uncertainty which accompanies all transitioning activity, however, the responsibilities of providers which accompany the management of learner expectation, strategic planning and commercial realities are such that there must be clear, well assessed timelines provided for each stage of the process which can be adhered to and which will facilitate due diligence on the part of all stakeholders.

The establishment of a panel of Independent Experts, capable of acting without conflicts of interest to carry out the evaluation of each application is welcome. However, there is an accelerated pace of change both in terms of subject matter expertise and pedagogical application resulting in a heightened need to engage in continuous professional development. In the interest of transparency and to provide reassurance to learners and providers alike, the members of the panel must be published and widely available.

Looking to the future, QQI will continue to set the standards for awards in the Further Education and Training Sector and to oversee the quality assurance of providers delivering learning and development programmes leading to those awards. There is a need to ensure that QQI policies and procedures for re-engagement with legacy providers will be focussed on ensuring the development and maintenance of high standards and will guard against incompetence, incapacity and unethical behaviour through explicit complaints and disciplinary procedures and processes

The acknowledgement of the requirement for the implementation of a communications process which will involve QQI undertaking dialogue with external entities other than providers is commendable and welcome in light of the feedback from the April meeting of the Consultative Forum. Feedback in relation to the requirement of QQI to engage with constituent groups, clarity on QQI's Workplan, Industry/Employer Engagement, Sectoral Interests, Industry Standards, etc, highlights the need to engage inclusively and positively with Industry, Stakeholder and Professional Bodies. Such bodies can support QQI in the engagement of large cohorts of provider and learner stakeholder groups, and can help to develop and maintain standards of knowledge and the

application of that knowledge to practice in an ethical manner as well as organising for the incorporation of new knowledge arising from practice, to influence those standards.

QQI can raise the status of further education and training and their own status by linking with key stakeholders such as learners, employers and professional bodies who are crucial partners in creating the value of further education and training as the key to overcoming barriers to employment.

SUBMISSION BY:

Irish Steiner Kindergarten Association

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Irish Steiner Kindergarten Association

Re-engagement with legacy providers, and the Policy & Criteria for Further Education & Training for Voluntary Providers paper. (May 8th 2014)

ISKA is a small not for profit Voluntary Childcare Organisation engaged in the development of high quality and distinctive early years care & education, supporting the availability of a diverse choice of early years training in Ireland.

The QQI white paper undermines the small organisation, and will effectively diminish the diversity of education & training opportunities available to the Irish people. Which will have a huge impact not only in the area of education, but the whole charity sector, plus the self-employment sector which receives such little support as is.

a) ISKA, as a small not for profit organisation which relies heavily on voluntary contribution from its council members, have already invested in its QA procedures and development of their first course. The extra work load & funding required to achieve the proposed QQI criteria may not be possible for ISKA and many other organisations.

b) QQI suggest that the smaller organisations should collaborate with large providers in order to offer their courses. In this case, though in the long term this will protect learners, in the interim & during transition, there is a high probability that organisations will lose potential learners, members and their good name for seamless provision of training, this could be seriously damaging to the small organisation.

It is essential that QQI recognise the concerns of these sectors and develop measures to support its legacy providers in this transition. One such measure would be that QQI inform, and strongly encourage larger providers, to be open to collaboration with smaller organisations. QQI would be expected to develop effective resources for legacy providers specifically designed to assist them in seeking and consulting with potential providers for their existent training courses.

Further QQI initiative & resources will be necessary for provider to provider networking, yet it would seem unnecessary for providers for to have such risk provision (2-3 other providers to whom learners can transfer), once a provider has met these new criteria, and QQI have given QA approval.

c) The suggested fees of €5000 (for FE) for new providers & to re-engage with QQI are exorbitant, especially in light of the extremely poor Fetac- Provider relationship & communication experienced by providers, which has resulted in QQI/Fetac QA & programme validation proving to be a very difficult journey for many smaller providers. It will be expected that QQI provide expert 1:1 QA consultation & resources in order to justify this fee.

d) It is expected that a gap analysis spoken of at the QQI briefings, will be published and further consultation with legacy providers take place prior to the adoption of these draft policies.

ISKA National Co-ordinator,
Mulhare hse. Mountshannon, Co. Clare

SUBMISSION BY:

**Irish Trainers Network (ITN)
– QA Services clients and members**

*Please note this response appears as received
and has not been proofed/edited by QQI.*

On behalf of QA Services clients and members of the ITN Irish Trainers Network

QA Services*/Irish Trainers Network**Submission to the Quality and Qualifications Ireland (QQI)

In response to

- I. QQI White Paper: Re-Engagement with Legacy Providers: Overarching Policy
- II. QQI White Paper: Policy and Criteria for Further Education and Training Legacy Voluntary Providers Continuing Access to Validation of Programmes Leading to QQI Awards

*QA Services provides a complete range of quality assurance, administrative, training and programme development services for FETAC/QQI quality-assured training centres and trainers/tutors and currently works with over 50 recognised FETAC/QQI providers

**The Irish Trainers Network (ITN) is a voluntary membership organisation which brings together training providers, trainers and facilitators from all sectors to share learning and experiences in relation to best practice, recent innovations, programme and business development, quality standards and continuing professional development. The ITN is currently at the set-up stage.

Introduction

We welcome the opportunity to engage in the QQI consultation process and to respond to the White Papers. We have surveyed members of the ITN* to get their views and we have incorporated their feedback with feedback from QA Services clients.

The main issues concerning our clients/members are outlined here

The key areas of concern for members/clients with regard to both White Papers are:

1. Proposed fees for re-engagement of legacy providers and other fees which will come on-stream
2. The perception that QQI is not interested in continuing in a relationship with 'small' providers
3. The resources they will need to invest in order to re-engage in terms of finance, time and human resources
4. Difficulties in communicating with QQI and the lack of clarity in QQI documentation *'that information provided by QQI is produced in language that a layperson can understand – i.e. clear and concise instructions'*

White Paper: Re-Engagement with Legacy Providers: Overarching Policy

The main area of concern arising from this Paper is the proposed fees for re-engagement.

While the introduction of fees will pose a problem for many providers, many are also happy to pay fees if the payment is matched by a more responsive, flexible and accommodating level and standard of service from QQI

Providers from not-for-profit community/voluntary organisation are asking QQI to consider not imposing any fees. One of ITN members in this sector suggests that *'If fee's are to be introduced we think it should be done on an individual assessment of each organisation'*

White Paper: Policy and Criteria for Further Education and Training Legacy Voluntary Providers Continuing Access to Validation of Programmes Leading to QQI Awards

The key areas of concern for client of QA Services and members of ITN with regard to this Paper are;

1. The proposed idea of consortia for Quality Assurance purposes
2. The timelines for re-engagement
3. The process for the evaluation of *provider capacity* for approval of QA

Consortia

Some of our clients/members are exploring the possibility of working as part of a consortium and, while on paper it looks like a good solution, the reality is often different. The main concerns are around the ownership of intellectual property and the possibility of the quality assurance agreement of the 'lead' provider (i.e. the provider who is recognised by QQI) being jeopardised or compromised by actions of another member of the consortium.

There will be a need for clear guidance from QQI regarding the establishment of consortia

The timelines for re-engagement

Providers will need timely, context-specific and clear direction via Consultations and Briefings and online information to guide them through the process

Providers need clear indication of time frames and notification of re-engagement criteria and to be given plenty of notice of termination of their existing agreement

The process for the evaluation of provider capacity for approval of QA

There is general consensus that there is a need for an enhancement of the existing quality assurance agreements and providers who are committed to providing high quality programmes and a well-supported learning environment for their learners (are most are) welcome this

If the 'new' system is to result in higher standard, there will need to be an increase in the depth, frequency and processes relating to the monitoring of recognised providers

Provider who decide not to engage in the process of re-engagement for whatever reason would welcome guidance from QQI with regard to how they might still have access to accreditation for their training programme or what options might be open to them

Conclusion

On behalf of our clients and members of the ITN we would like to thank QQI for the opportunity to respond to the White Papers. We would also note our appreciation for the series of Consultations on the White Papers which were informative and heralded a change of approach by QQI in terms of how the organisation communicates with providers. We look forward to continuing engagement and we are happy to meet QQI representatives at any time to expand on any issue raised in this paper or in the process generally

Cathleen Hartnett

SUBMISSION BY:

Irish Universities Association

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Irish Universities Association

In relation to the obligation of Previously Existing Universities (PEUs) to reengage with QQI, the universities reaffirm their intention to work with QQI with respect to the QQI Act 2012 and in the collaborative development of new QA guidelines and the development of a new review mechanism.

The universities await the release of the 'Review of Reviews' report and the Quality Assurance Framework for PEUs, in order to establish internal quality procedures as per Section 29 of the 2012 Act and expect discussion of any proposed timeframe with QQI.

The universities are currently engaged with QQI to clarify roles and responsibility with respect to quality assurance by PEUs of Linked Providers, under the 2012 Act. The universities await the outcome of this process to better understand the responsibilities and the resource implications associated with institutional and/ or programme reviews of Linked Providers. In particular where Linked Providers:

- have relationships with more than one PEU in Ireland or a non – PEU validation body in Ireland or internationally, for one or more programmes.
- may be in transition between PEUs with respect to validation of programmes, a process that can take three or more years, while enrolled students complete their programmes.

QQI may need to provide sectoral guidance with respect to recommended fees for quality assurance by PEUs of linked providers, for institutional and / or programme reviews. This fee should equate with costs charged by QQI if a Linked Provider sought to engage QQI as a provider of quality assurance. This would mitigate the risk that Linked Providers are influenced by economic costs associated with choosing a PEU to validate programmes and quality assurance under the 2012 Act.

On behalf of the seven universities:

Lewis Purser
Irish Universities Association
48 Merrion Square
Dublin 2
Ireland

SUBMISSION BY:

**Joint Managerial Body (JMB);
Association of Community and
Comprehensive Schools (ACCS)**
– joint submission

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Joint JMB-ACCS Submission on the QQI White Paper *'Re-Engagement with Legacy Providers – Overarching Policy'*

Introduction

JMB and ACCS both represent schools providing Further Education previously accredited by FETAC, as well as BTEI and other adult education services to the communities they serve.

We welcome the publication of the QQI White Paper: *'Re-Engagement with Legacy Providers – Overarching Policy'* and are grateful for this opportunity to comment on its intentions and provisions.

In recent times, JMB and ACCS have come together to provide joint briefings, seminars and electronic updates to our FE and adult-education providing members. Such an approach is merited because our schools have much in common in terms of scale of provision and their experience of similar developmental, compliance and viability challenges.

The recent multiple transitions affecting the FE and Training landscape in Ireland are positive developments but are also associated with the challenges of effective communication on the part of policymakers and adaptation to new modalities of provision on the part of schools.

In this context, the clarity and brevity of the White Paper is to be commended and this brief submission is intended to afford the perspective of the minority school-level providers our organisations represent.

Overarching Stance

The leadership of both ACCS and JMB have agreed in principle to act jointly on FE matters in terms of their relationship with the Department of Education & Skills, relevant statutory bodies such as QQI and SOLAS and also with ETBI.

A Memorandum of Understanding is currently being finalised by both organisations and will be shared with QQI on its completion. Its overarching provision is that QQI (among others) will, in future, be in a position to deal with the Voluntary Secondary and Community and Comprehensive FE-providing schools under a single entity, currently called the Joint Further Education Representative Group (JFERG).

Future Position

Section 1.1: Expiry

The White Paper frames both the transitional arrangements for legacy providers and also the model identified as optimal for future engagement. In this respect, our schools have had single-provider recognition under FETAC but this will expire and a process of re-engagement commences.

Section 1.2: Provider Groups

The paper states that re-engagement will be implemented differently for different groups of providers and introduces the concept of a 'lifecycle' to comprehend a particular group's relationship with QQI.

In this context, it is intended that the Voluntary Secondary and Community and Comprehensive FE-providing schools will begin their lifecycle by re-engaging with QQI as a single entity and be represented by JFERG. It is accepted that approval for such an arrangement will require to be sought from QQI. If approved, the scope and range of engagements between QQI and JFERG around, for example, course development and quality assurance, will be determined and it is hoped that the new joint entity may 'act autonomously in developing programmes and assessing learners and focussing on the achievement of learning outcomes'.

Section 1.2.1 identifies our member schools as 'obligatory providers' as opposed to 'voluntary providers' and points-out that re-engagement of our FE-providing schools with QQI *must* happen.

Section 2: The Re-Engagement Process

The paper states that the re-engagement process involves issuing policy, criteria and relevant QA guidelines for each specific group of providers in order to allow them to re-engage. JFERG, once established, will work positively and closely with QQI to establish reengagement mechanisms, quality assurance provisions and be authorised to make payment of fees to QQI as set out in any eventual agreement.

Section 3: Review

It is accepted that re-engagement is a once-off process for each provider group and the policy as set-out does not require review. It is, however, anticipated that any eventual agreement reached between QQI and JFERG will be subject to review in terms of its operation and in light of emerging developments in this new policy and provision landscape.

Ferdia Kelly, JMB General Secretary
Ciarán Flynn, ACCS General Secretary
May 2014

SUBMISSION BY:

**Limerick and Clare Education
and Training Board**

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Limerick and Clare Education and Training Board

Responding on behalf of LCETB, Limerick and Clare Education and Training Board

LCETB welcomes the opportunity to re-engage with QQI in the establishment of an effective Quality Assurance framework. Recent transitions both within QQI and the ETB sector necessitates a systematic review of policies, procedures and operations. LCETB applaud QQI for their comprehensive approach to the issue, are grateful for the detailed communication offered by QQI – particularly at the 7th April briefing, and are confident that the ETB sector can continue to develop the close working relationship with QQI. Despite the major transition across the sector, this approach by QQI will result in an improved learner experience and ensure the high standard of quality assured training and learning continues into the future”

Alan Hogan, Quality Assurance Development Officer, Limerick and Clare Education and Training Board (LCETB), Adult and Community Education Centre, Clonroad Business Park, Ennis, Co. Clare.

SUBMISSION BY:

Longford Women's Link

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Longford Women's Link White Paper Submission (FET Legacy Voluntary Providers) to QQI

May 2014

Provider Profile

Longford Women's Link (LWL) is a long standing provider of Community Education in Longford Town and County. Education and Training at LWL is delivered according to the principles of Women's Community Education (WCE). LWL is a women's centre based in Longford Town and has been in existence since 1995. We provide a wide range of services, including Education and Training (FETAC Centre), using our Integrated Service Model. In September 2011 we opened a dedicated WCE Facility at LWL and we are an Outreach Centre for the UCD Women's Studies Programme as well as NUI Maynooth. 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's purpose-built WCE facility has provided a much needed resource to cater for the additional Education and Training needs of learners in Longford. LWL delivers programmes from Levels 3-6 under the new CAS system. LWL is also an ECDL centre as well as an ECDL eLearning Test Centre for FAS. In 2013, 306 students completed 34 courses/modules, resulting in 9,833 tutor/student contact hours. As an outreach centre for UCD, NUI Maynooth and the Irish Academy of Public Relations, LWL provides much needed access to third level education in Longford.

LWL is a member of AONTAS, the National Adult Learning Organisation, and is represented on the AONTAS Executive Committee as well as being an active member of the Community Education Network (CEN). To date, LWL has fed into the AONTAS response to the changes in Further Education and Training and the establishment of SOLAS and the Education and Training Boards and we welcome the opportunity to make this submission to QQI.

Longford Profile

The majority of our adult learners are from Longford Town and County. The Trutz Haase Profile Report (2013) shows that The Midlands Region is the third most deprived region of Ireland and County Longford is the most deprived local authority area within this region. Like any other part of the country, Longford has been severely affected by the economic downturn after 2007, reflected in the drop in the absolute deprivation score from -4.9 in 2006 to -12.1 in 2011. This represents a drop

of 7.2, compared to a nationwide drop of 6.5. Longford is the fourth most disadvantaged local authority area in Ireland.

In terms of education, the proportion of adults with third-level education in County Longford is more than eight percentage points below the national average, and remains to be the second lowest proportion pertaining to any county. While many of our adult learners accessing education opportunities at LWL are early school leavers or women wishing to undergo a positive learning experience, some of our adult learners are seeking to upskill or to retrain following redundancy/periods of unemployment. In this regard, unemployment rates for County Longford have fallen significantly less than the nationally prevailing ones between 1991 and 2006. Male unemployment fell from 16.1% in 1991 to 10.2% in 2006, a drop of 5.9 percentage points (compared to 9.6 percentage points nationally). In contrast, female unemployment increased by 1.3 percentage points, from 11.9% to 13.2% (compared to a drop of 6.0 percentage points nationally). Critically, Longford is the only county in Ireland where the female unemployment rate actually rose during the Celtic Tiger Years. Given the lack of employment opportunities in the area, appropriate education and training opportunities are vital.

Longford also has a high proportion of female-headed lone parent households. Female lone parents who wish to avail of education and training opportunities at LWL face the added barriers of childcare and transport facilities as well as rural isolation for those living outside urban centres. In terms of the proportion of lone parents (as a proportion of all households with dependent children) County Longford had a rate of 22.3% in 2011; i.e. marginally higher than the national average of 21.6%. However, reflecting the urban-rural differences within the county, areas such as Longford No. 1 Urban (44.8%), Killashee (43.6%) and Ballinalee (35.8%) all have rates which are extremely high by national comparison.

Women's Community Education

As a Women's Community Education centre, LWL is committed to adult education and community development based on the recognition that women have unequal access to resources and to influence, and challenge these inequalities. We are committed to providing the very highest standards in Women's Community Education – education, a unique and distinctive approach that enables and empowers women to make choices about their lives by being:

- Based on on-going social analysis of gender equality and social inclusion issues
- Based on commitment to women's safety, growth, and well-being
- The creation of space for feelings as well as dialogue
- Based on peer support as well as staff support
- Informed by participative evaluation and self-evaluation

Comments on QQI White Paper

Financial Issues

While the issue of fees is not explicitly dealt with in the current White Papers, LWL would like to address this matter at the outset. Providers delivering WCE to specific groups play a key role in the delivery of education and training to learners experiencing disadvantage and any potential policy reforms (FET awards or CAS) should not impact on the opportunity for learners to access and engage with education and training supports. In addition, resources continue to impact not-for-profit providers in the delivery of WCE, particularly those who are dependent on specific funding streams such as BTEI and who are based in disadvantaged areas. Many providers in this sector are in the same position as LWL and do not have multi-annual funding. While LWL recognises that QQI wishes to ensure absolute credibility of qualifications (and supports this), it must be noted that any additional financial or administrative demands (related to the re-engagement process) on community providers will place these centres under extreme pressure and may result in service reductions which naturally will impact on the very communities we aim to support. LWL would welcome clarity on any proposed fees for re-engagement, bearing in mind Section 3.9 of the QQI Fees Policy which states that any fees will be set at a level that is sustainable both for QQI and for the education and training sector.

Process of engagement with QQI and voluntary providers

LWL recognises the coordinating role to be played by QQI in determining framework standards – organisations within the community and voluntary sector may also be a useful ally in relation to standards development and ensuring that the ‘lifelong learning’ element of adult and community education is retained while also fulfilling labour market objectives.

LWL believes that consistent and relevant communication flows are the key strategy in terms of engaging with legacy providers. To date, guidelines, particularly in relation to programme validation have not been clear, resulting in delays and waste of resources. Also, the turnaround time for queries has been very slow and the FETAC website was not particularly user friendly. It is simply not feasible to have to read through large documents online to try and locate relevant updated information. Any major updates need to be synopsisised and sent by email.

In addition, it is vital that adequate notice periods are provided to voluntary providers. As stated above, given the lack of multi-annual funding in many cases coupled with the increasing demands on the sector, short turnaround times will simply not be feasible and will have a detrimental impact on the process.

Finally, LWL would welcome clarity on what is meant by 'minimum capacity' (Section 4, White Paper Policy and Criteria) in relation to providers and whether this refers to human/financial resources. LWL would urge QQI to ensure that the expertise of community education providers is not discounted, particularly in terms of QA and programme development. The recognition of different needs according to levels of disadvantage and/or geographic location is also required e.g. a rural woman experiencing economic disadvantage and social isolation may have very different learning needs to an urban man/woman who may have better access to learning centres/transport or who may have a different set of barriers to overcome.

It is essential that there is sufficient confidence in Community Education providers who take responsibility for developing and delivering their programmes in order to deliver education and training content at the appropriate level and within the required frameworks and standards.

Contact Details

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Deputy CEO,
Longford Women's Link,
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Ardnacassa Avenue,
Longford

SUBMISSION BY:

National College of Business Administration

*Please note this response appears as received
and has not been proofed/edited by QQI.*

National College of Business Administration

White Paper on the Re-engagement with Legacy Providers: Overarching Policy White Paper on Policy and Criteria for Further Education and Training Voluntary Legacy Providers Continuing Access to Validation Leading to QQI Awards

1. QQI need to look the systems they put in place in the context of their capacity to engage with providers. QQI need to promptly deal with application queries and progress applications through the re-engagement process in a timely fashion. Providers cannot be left waiting for answers from QQI for long periods of time before they can deliver programmes that are in demand by learners.
2. QQI need to provide clear information on what is required from providers. This would reduce the need for constant requests for clarifications where providers are made feel they are contacting QQI at their peril.
3. QQI need to fully engage throughout the process in partnership with providers with regular meetings and identified points of contact between QQI and providers. We feel the smaller meetings work best - end user involvement is critical in putting workable systems in place.
4. QQI should look at what worked/did not work with previous processes i.e. validation.
5. Provider capacity needs to be considered when developing timelines for completing the re-engagement process. The market depends on small providers in coping with the diverse demands of the sector. QQI systems should not become the major obstacle in the survival of these providers.
6. Provider's previous engagement and resource development costs need to be considered.
7. Fees for re-engagement/QA approval should not be so high that make competing with state providers un-competitive.

SUBMISSION BY:

The National Disability Authority

*Please note this response appears as received
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The National Disability Authority

Consultation on the Quality and Qualifications Ireland's policy papers May 2014

The National Disability Authority is the independent statutory advisory body on disability policy and practice, and on universal design.

The National Disability Authority welcomes the opportunity to provide feedback on the Green Paper and three White Papers published for consultation by Quality and Qualifications Ireland (QQI):

- Green Paper on "Facilitating the Recognition of Qualifications"
- White paper on "Policy and criteria for Higher Education and Training Legacy Voluntary Providers"
- White paper on "Policy and criteria for Further Education and Training Legacy Voluntary Providers"
- White paper on "Re-engagement with legacy providers"

The National Disability Authority advises that the QQI, as with all public bodies, has a remit to ensure that its policies and procedures take into account the requirements to accommodate people with disabilities in line with the provisions of s 26 of the Disability Act 2005. Under these provisions, where practicable and appropriate, education and training for people with disabilities and others should be integrated. It is important therefore that QQI ensure that the framework in Ireland for the recognition of qualifications, and all policies and criteria for both Further Education and Training (FET) providers and Higher Education and Training (HET) providers wishing to validate their programs leading to QQI awards are disability proofed.

The National Disability Authority recognises that the Green Paper and three White Papers available for consultation are primarily concerned with the establishing the framework and policies related to the recognition of qualifications and the validation of programmes leading to QQI awards. Specifically we note that two of the White Papers deal with moving educational providers in Ireland out of the current transition arrangements and into a position of formal engagement with QQI, on the basis of the functions are set out in the 2012 Act. It is the National Disability Authority's view that a key aspect of this process in relation to the education and training of persons with disabilities are the Quality Assurance procedures that will be established by the HET and FET providers, as referenced in the White Papers. It is the National Disability Authority's understanding, based on a conversation with the QQI, that the content of these QA criteria will be published and available for consultation later this year or in early 2014.

The National Disability Authority advises that the content of the QA criteria and procedures are critical to how FET and HET providers engage with learners with disabilities. For example the previous FETAC QA guidelines cover policies and procedures on key topics such as;

- Communications,
- Equality,
- Access, Transfer and Progression;
- Programme Development, Delivery and Review, and

- Fair and Consistent Assessment of Learners)¹.

The National Disability Authority is eager to consult on any new or updated Quality Assurance guidelines that form the basis of engagement between QQI and HET and FET providers in Ireland. We therefore expect to have more detailed and substantive comments to make on the content of these QA criteria related to learners with disabilities and their needs and accommodations that work. In this present round of consultation we therefore limit our comments to general observations and advice based on the National Disability Authority's role on disability policy and practice, and on universal design.

Importance of education and training to inclusion of persons with disabilities in society.

NDA research shows that people with disabilities are more poorly educated than the population at large. In particular, young people with disabilities are more likely to have underachieved relative to their peers on leaving education. Further education and training is essential to develop their talents and capacities in the future. People who acquire a disability in adult life are disproportionately drawn from people with lower levels of education. Manual workers, who are more vulnerable to disability, may lack the skills to transfer to other occupations without further training.

In counterpoint to this, the World Report on Disability has noted that there are few jobs which someone with a disability cannot do, and few people with disabilities cannot work. A further education and training system that is focused on maximising people's capacity, their self-belief, identifying what they can do and building on that, can play a part in breaking this cycle of low expectations and low educational and training attainment.

Further education and training play a key role in providing a pathway for people with disabilities into employment. This includes providing effective bridges for young people with disabilities from school into education or training, and providing opportunities to the many people with disabilities who have left the workforce, so they can re-engage and acquire skills that can lead to work.

Person centred-learning

The Disability Act 2005 established the Centre for Excellence in Universal Design within the National Disability Authority to promote Universal Design in education and standards. The Act defines Universal Design to mean the design and composition of environments so that can be accessed, understood and used to the greatest extent for possible by all people regardless of their age, size, ability or disability.²

For learners with disabilities, it is important that training and education are designed around the individual and their learning style.

In its 2013 report "What Works in the Provision of Higher, Further and Continuing Education, Training and Rehabilitation for Adults with Disabilities?", the National Council for Special Education

¹Quality Assurance in Further Education and Training: Policy and Guidelines for Providers v1.3, http://www.fetac.ie/fetac/documents/Policy_and_Guidelines_on_Provider_QA_v1.3.pdf

²<http://www.universaldesign.ie/explore&discover/definitionandoverview>

noted the emergence of universal design for learning (UDL) in course design, teaching methods and assessment, and its relevance in supporting access.³ The report found that that UDL is an area of development with respect to supporting learners with a diverse range of abilities and that “indications are positive and the research base is developing.” It concludes that “UDL is strongly focused on teacher training and the literature shows that even a little training can have a notable impact on the learning experience of students with disabilities”. (page 165)

The National Disability Authority recommends that universal design for learning is considered by QQI as a key theme in the QA polices mentioned above.

Gathering data and measuring outcomes

It is important that all actors involved in the ecosystem of the provision of education and training in Ireland have access to accurate data on the outcomes of persons with disabilities. There is at present a paucity of data on many aspects of the experience and outcomes of persons with disabilities in training and education. The National Disability Authority therefore advises that the QQI, in its engagement with training and education providers, requests that accurate and reliable data is gathered on outcomes achieved and experiences of persons with disabilities. The National Disability Authority is available to advise on gathering such data. Given the range and number of FET and HET providers QQI engages with It is particularly important that data is collected in a way that it is comparable between relevant providers and across sectors.

Universal Design and award standards

Under the Disability Act 2005 the Centre for Excellence in Universal Design is tasked with “assisting and promoting the introduction of the principles of universal design to courses of education and training” and liaising with “vocational and third level educational institutions and with professional bodies to” the development of appropriate curricula for courses of education and training related to architects, engineers, town planners, systems analysis's, software designers, transport providers and designers of passenger transport vehicles and passenger vessels.

The National Disability Authority therefore has a statutory remit to influence curricula and standards in courses related to the aforementioned professions, as well as to ensure that that examinations recognised by professional bodies in such courses include material relating to Universal Design. The Centre for Excellence in University design is currently undertaking a programme to develop, promulgate and promote the use of said curriculum in relevant courses and is currently engaging with universities and Institutes of Technologies as well as relevant professional bodies such as Engineers Ireland and the Royal Institute of Architects of Ireland on an ongoing basis.

The National Disability Authority is aware of QQI’s roll in facilitating the development of standards for particular areas of practice and that these standards will become available for consultation from time to time. We are therefore available as part of our statutory remit to contribute to the production on and consultation of award standards in the areas of practice outlined above. We wish to engage with QQI in the development of such award standards and are available to sit on relevant development groups and and to consult on draft award standards.

³http://www.ncse.ie/uploads/1/Report_15_Adult_Ed_19_12_13.pdf

SUBMISSION BY:

Respond! College

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Respond! College

Response to QQI Consultation Process regarding the below 3 QQI White Papers concerning 'Legacy Voluntary Providers'

QQI White Paper: Re-Engagement with Legacy Providers: **Overarching Policy.**

QQI White Paper- Policy and Criteria for **Further** Education and Training Legacy Voluntary Providers Continuing Access to Validation Leading to QQI Awards.

QQI White Paper- Policy and Criteria for **Higher** Education and Training Legacy Voluntary Providers Continuing Access to Validation Leading to QQI Awards.

Response to QQI White Paper consultation process re F.E and H.E. 'Legacy Voluntary Providers'

Respond! College welcomes the Consultation process and opportunity to engage with QQI regarding its policy process including the arrangements/re-engagement process with Further and Higher Education 'legacy providers'.

Respond! College endorses the points raised by AONTAS in its submission to QQI regarding Further Education legacy provision .

In addition, Respond! College raises the following points of concern:-

1. **Proposed QQI validation Fees for re-engagement of FET and HET 'legacy providers'.**

Respond! urges QQI to take into account

(i) the different commercial status of providers and to charge a €0 fee to not-for-profit providers, or

(ii) scale the level of QQI validation fee in line with the level of State funding subvention for education received.

Most NFPs and Community Education Providers deal with learners who are overcoming cumulative disadvantage- yet receive little or no State subvention to support education provision. To make such Education Providers liable for Validation fees additionally burdens an already overstretched sector and would further reduce access to validated education opportunities for the most disadvantaged.

(iii) Respond! College requests that if the timing of the re-engagement validation process with QQI is sooner than the HET review framework anticipated (a 5-year frame) in the legacy arrangements with HET, that an annual pro-rate reduction in any fees charged apply.

2. **Certification fees for FET enrolled learners- waiver.**

Respond! College asks that QQI retain the current FET policy of a waiver of certification fees for enrolled learners who are in receipt of social welfare payments and/or are Medical Card Holders, given the socio-economic challenges facing such learners. [FET learner certification fees are currently €20 for a component award and €50 for a major award at FE levels 5 and 6 with no certification fee applied to Levels 1-4.]

3. **PEL: Protection of Enrolled learners.** Respond! College welcomes the protection of enrolled learners but requests that QQI allow Providers to *advertise* their approved programmes even if PEL arrangements are not fully in place (there is a considerable lead-in in obtaining alternate providers), even if course commencement is subject to PEL policy completion.

4. **PEL: Fee refund provision** (in lieu of PEL arrangements with two alternative providers) we request

that this arrangement be at the discretion of the Provider / automatically accepted by QQI

(iv) where programmes have no ready match of alternate providers (as provided for by QQI and the 2012 Act) and

(v) where competition for a niche market is likely to make PEL particularly difficult.

(vi) We suggest that the amount of fee refund required to cover PEL programmes be underwritten by the provider company (e.g., via Board notarised statement underwriting the amount of funds required for PEL), rather than having to ring-fence funds in a bank/financial institution. Ring-fenced arrangements give no further protection to enrolled learners and are unnecessarily onerous particularly for not-for-profit and community education providers. (A bank balance can be verified at a given date and withdrawn immediately after, whereas underwriting of agreed funds with verification by a financial institution of the company's capacity to so underwrite is more meaningful). Suitable wording to satisfy the

intent of PEL is possible without compromising the funds of NGOs / not-for-profit providers.

5. Consortia /individual provider liaison with QQI

Respond! College welcomes QQI's commitment to exploring diverse methods of engagement with providers including the option of network and consortia, but equally urges QQI to retain the option for providers to engage directly with QQI if that model best suits the provider.

6. Respond! College requests clarification of the "*wider responsibilities as a member of national and international training community*" (QQI HE legacy provider doc., p5}

Respond! College is conscious of the need for engagement within the Higher Education community in terms of dialogue, networking, research, collaboration and academic exchange, however, expectations of such engagement need to be commensurate with the size, scale and state funding received to enable and support such interactions and activity.

7. New legal Footing

Respond! College acknowledges the new re-engagement process with QQI. It is in agreement with QQI's suggested engagement process with legacy providers of (a) self-audit of provider own QA manual and procedures; (b) gap-assessment (policy/actual); (c) liaison with QQI on basis of above evidencing provider capacity and any changes and enhancements in the provider's fit-for-purpose QA policy and procedures arising.

Respond! College also welcomes QQI's assurance that "positive outcomes of prior QA review will be considered significant evidence of provider QA procedures meeting QA criteria for approval." (QQI H.E. legacy voluntary provider's doc, section 2.2, p.9).

8. QQI has confirmed it will publish a note of the *differences* between legacy and new FET provider requirements for QA- this is awaited.

9. Respond! College requests that the QQI Provider Lifecycle of Engagement and criteria by which AQ procedures for QA HET legacy providers be agreed with QQI, be published in a consultative format allowing provider input before being finalised.

10. Respond! College welcomes the opportunity for on-going consultation and liaison with QQI regarding its policies and enhancement of quality learning environment and QA standards.

Respond! College
9May2014.

SUBMISSION BY:

**Skillnet Network Managers
(Certification Group)**

*Please note this response appears as received
and has not been proofed/edited by QQI.*

On behalf of the Certification Group of Skillnet Network Managers

Dear QQI,

Please see our submission below on the white papers (an extension was agreed for submission today):

- White Paper on the [Re-engagement with Legacy Providers: Overarching Policy](#)
- White Paper on [Policy and Criteria for Further Education and Training Voluntary Legacy Providers Continuing Access to Validation Leading to QQI Awards](#)
- White Paper on [Policy and Criteria for Higher Education and Training Voluntary Legacy Providers Continuing Access to Validation Leading to QQI Awards](#)

We fully agree that QA requirements need to be reviewed as part of the re-engagement process and that the continuing quality of and confidence in QQI awards is critical. The provider lifecycle is also a reality as many providers (primarily in the FE sector) may decide not to re-engage for a variety of reasons. We are concerned about the impact on not for profit / smaller providers with the introduction of fees for every facet of engagement with QQI. While we understand the financial necessity, we know that this will mean ultimately that many providers- many of whom are working in these areas of provision, will not be financially able to re-engage. For the learner it will mean that many of these costs are passed onto them by providers that do re-engage, making accredited programmes far less accessible than they have been to date- fundamentally compromising access to learners. A simpler solution to generate funds would have been to increase the cost of certification per head- thus the larger providers submitting large volume of learners each submission period would have paid more and the smaller providers submitting smaller volumes would not have been impacted to the same degree as they will be going forward.

It is also clear that going forward QQI are looking for consortia of smaller providers. In the FE sector while this makes sense, this would present a number of challenges, and strong guidance would be needed from QQI on how this could be successfully achieved - although consortia/ collaborations won't work in all cases.

Programme validation is already an onerous and lengthy process; the Policy and Criteria for Further Education and Training Legacy Voluntary Providers Continuing Access to Validation of Programmes

Leading to QQI Awards states *'Following the publication of the guidelines and criteria, applications by providers for programme validation will only be accepted by QQI where they are accompanied or preceded by an application for QA approval'* – greater clarity is need around this to help legacy providers to re-engage. Legacy relationships should be given more recognition and fees for agreeing new QA procedures should not be the same as that of a new provider applying for the first time. E.g. A number of specialist legacy providers worked very closely and for significant periods of time with FETAC to migrate existing awards to the Common Awards System over the past number of years. The introduction of the full range of fees for all services will mean that providers like these, who have a long and established history of working with the legacy body are forgotten and with the expected non- re-engagement of a number of not for profit centres, there will also be large gaps in areas of voluntary and specialist provision going forward.

There is a growing sense that there is a bias towards the HE sector and that QQI are keen to significantly reduce the number of providers in the FE sector. This is a huge concern for voluntary and not for profit providers that are often catering for learners in a specialised/ niche area and it is crucial that these learners are protected. Commercial providers won't be interested in catering for this type of learner as it wouldn't be financially viable. Timescales for re-engagement and agreeing QA procedures with legacy providers will have to be very clear, with plenty of notice given to allow providers sufficient time to manage and plan this process. E.g. If there will be fees for 5 yearly reviews of QA processes, again this will have to be very clear from the outset – e.g. options for stage payments should also be offered to smaller providers.

Thanks & Kind Regards

Catherine Collins

On behalf of the Certification Group of Skillnet Network Managers

SUBMISSION BY:

**South East Community Training
& Education Centre Ltd.**

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Patricia Howlin
South East Community Training & Education Centre Ltd.
Norse Gate House
St. Peter's Square
Wexford

Submission on behalf of **SECTEC Ltd** to the

**White Paper on Policy and Criteria for Further Education and Training Legacy Voluntary Providers
Continuing Access to Validation of Programmes leading to QQI Awards**

We feel strongly that –

- A) **Community/Voluntary Sector organisations** should be treated in the same way as other voluntary providers as outlined in page 3 of the White Paper. These providers are not for profit organisations working in the main with the most marginalised and vulnerable groups.
- B) The fees for **QA should not** be applied to this group as was previously the case under FETAC
- C) The fees for **Programme Validation should not** be applied to this group. In many cases these providers may only be delivering a small number of programmes annually but none the less the impact of these programmes on the participants availing of them is significant and must not be underestimated.
- D) Funding streams available to these groups are for specific programmes and do not allow for or take into account fees for QA, Programme Validation etc.
- E) This is the **Department of Education & Skills, QQI** imposing exorbitant fees on a very small under-funded community & voluntary education and training sector and is essentially an additional source of revenue for the government.
- F) **FETAC providers** have already agreed **QA Policy and Procedures** and been subject to in many cases strict monitoring of same, why then do legacy voluntary providers have to re-engage in this process again?
- G) No details given in the White Paper about commencement time for this process, length of time this process will take etc. At present programme validation is taking in excess of 26 weeks to receive initial feedback.

SUBMISSION BY:

SQT Training Ltd.

*Please note this response appears as received
and has not been proofed/edited by QQI.*

SQT Training Ltd

This response is being sent on behalf of SQT Training Ltd in relation to the QQI White Papers

Re-engagement with Legacy Providers: Overarching Policy

Policy and Criteria for Further Education and Training Voluntary Legacy Providers Continuing Access to Validation Leading to QQI Awards

Policy and Criteria for Higher Education and Training Voluntary Legacy Providers Continuing Access to Validation Leading to QQI Awards

SQT Training Ltd recognises the requirement for each legacy provider to re-engage with QQI in relation to its QA procedures in accordance with Section 30 of the Qualifications and Quality Assurance (Education and Training) Act 2012. The company supports this initiative and is committed to continuing to meet its statutory and quality requirements.

We have engaged with the consultation process and attended one of the 'communication' events, in relation to these White Papers, and remain unsure of the possible *Policy and Criteria for Higher (and Further) Education and Training Voluntary Legacy Providers Continuing Access to Validation Leading to QQI Awards*. While acknowledging that it will be similar to that for new providers, SQT is of a mind that, until this Policy and Criteria document is available for review and consultation we are unsure of the overall process involved and how it will impact on SQT Training Ltd.

While we welcome the concept of a Lifecycle which will define the provider's ongoing engagement arrangements with QQI, we feel that the consultation process and our understanding of the future transition period could have benefited from some indication of the type/extent/duration of cycle which might be experienced. This is of particular concern to SQT as an organisation which operates FET and HET programmes, has recently undertaken a HET Institutional Review, and has a number of FET programmes due to expire over the coming period – for instance, how soon does our re-engagement have to commence, what timeframe are we going to be working to, and can we validate FET programmes in the interim?

While we welcome the impact that this re-engagement will have in facilitating provider networks and consortia, the lack of clarity in relation to the possible fees incurred is a cause of concern for SQT, and it appears, throughout the sector.

Finally, we hope that this re-engagement process will continue to further develop open and responsive communication between QQI and legacy providers within both the HET and FET sectors.

Siobhan Cuning
Managing Director
SQT Training Ltd
Callan Centre
National Technology Park
Limerick

SUBMISSION BY:

**Warrenmount Community
Education & Development Centre**

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Warrenmount Community Education & Development Centre: Submission to the Quality and Qualifications Ireland (QQI)

8th May 2014

- I. QQI White Paper: Re-Engagement with Legacy Providers: Overarching Policy
- II. QQI White Paper: Policy and Criteria for Further Education and Training Legacy Voluntary Providers Continuing Access to Validation of Programmes Leading to QQI Awards

Contact: Pauline McGaley
Centre Director

Warrenmount CED Centre, Mill Street, Dublin 8

Introduction

Warrenmount Community Education & Development (CED) Centre aims to meet the needs of the local community by building confidence and developing skills. Learning in the Centre is person-centred and informal. The Centre runs a range of programmes, generally aimed at the second-chance learner (those with less than upper second level education). We aim to provide quality educational opportunities within the NFQ levels 3 to 5. For more detailed information, statistics etc., please consult our annual reports at the following location: <http://www.warrenmountcentre.ie/pages/reports.htm>.

Warrenmount (CED) Centre welcomes the opportunity to engage in the QQI consultation process. This submission represents its commitment to the process. The paper outlines the main issues for our organisation.

This submission outlines the concerns of Warrenmount CED Centre with regard to:

- I. QQI White Paper: Re-Engagement with Legacy Providers: Overarching Policy
- II. QQI White Paper: Policy and Criteria for Further Education and Training Legacy Voluntary Providers Continuing Access to Validation of Programmes Leading to QQI Awards

The key areas of concern for Warrenmount CED Centre with regard to both White Papers are:

1. Proposed fees for re-engagement of legacy providers
2. The proposed idea of consortia for Quality Assurance purposes

White Paper: Re-Engagement with Legacy Providers: Overarching Policy

The main issue with this White Paper for Warrenmount CED Centre is the proposed fees for QA approval.

2.5 Fees for Approval of QA (page 7)

A fee will apply for the approval of a provider's QA procedures.

The exact fee for the re-engagement process for legacy providers is unclear in the Fees Schedule October 2013, however it could be estimated as €5000, in line with section 1.1 *Fees for the submission of quality assurance procedures for approval in respect of new providers (Section 80, a).*

As voluntary providers (page 5: 1.2.2) encompass a diverse range of providers including for-profit providers, we strongly urge that no fees for re-engagement be applied to not-for-profit community/voluntary organisations.

Not-for-profit education providers should not be required to pay QQI fees for re-engagement because:

- We provide classes for the most hard to reach learners, who would not generally engage in formal adult education, at the lower levels on the NFQ (3, 4 & 5). It is current policy to provide free classes to adults with less than second level education, so, on the one hand we receive funding to run our programmes, on the other hand we are being charged to do so...
- The funding we receive for the classes we run covers tutor contact hours only; therefore, it is unclear how we can budget for unspecified fees, at unspecified intervals.

- It will further disadvantage learners who are least likely to engage in accredited learning which is counterproductive to achieving national policy agendas regarding up-skilling, labour activation and social inclusion; particularly for the unemployed and those at the lower levels of the NFQ.
- Community Education Centres are already underfunded and engage in education provision that is unprofitable for private providers as we offer extra supports, in areas such as literacy and English language, in addition to unquantifiable support in community capacity building / social integration.

We re-iterate the Community Education Network's belief that it is important to recognise the need for a diversity of FET provision which ensures that those individuals who are most distanced from the education system are supported to engage. With this backdrop the role of community education comes to the fore, it has a history of effectively engaging the most hard to reach through its approach: outreach work, the non-threatening, welcoming environment; the learner supports; the specific learning methodology; and its location in, and knowledge of, the community.

Learners who do not participate in courses delivered by statutory providers, or who may require the kind of provision that is unprofitable to private providers, can take the step into learning through community education. The number of learners that a community education organization engages cannot be compared to formal adult education, as most learners are from hard to reach groups and require a range of supports to build up their capacity to participate and complete an accredited course.

One of the most important developments in recent times has been the ability of community education providers to offer accredited courses which allow learners to take that step towards achieving a full award, to progressing to further accredited learning and ultimately secure employment. For example: disadvantaged learners with the lowest level of qualifications are the main cohort of community education learners. The attraction of community education is its strength for engaging learners; however it is one of the most underfunded parts of the FET system. Community Education providers are already struggling to provide a service to their community and learners. To propose a fee for the re-engagement of legacy community education providers is discriminatory.

From the learners' perspective, in order to support their ability to participate in accredited learning, their first step back is the most crucial. Community Education, having access to recognised programme awards from level 1-5, allows learners to make the transition to accredited learning and acts as the building block for further accreditation attainment.

However, community education organisations will not be able to access accredited programmes through the QQI if a fee is applied for re-engagement.

SUBMISSION BY:

YMCA Ireland

*Please note this response appears as received
and has not been proofed/edited by QQI.*

YMCA Ireland has been a provider since 2006 and we are very concerned with the implementation of fees for legacy providers and further fees for the revalidation of QQI Awards.

The fees suggested (€5,000 for re engagement every 5 years and €2,000 revalidation per award with similar effect) will price our and similar sized community and voluntary organisations out of the system.

We feel there needs recognition that we are providing a Public Good by offering education and training programmes for marginalised and disadvantaged groups. With the years of austerity and consequent funding cuts to our service the cost of this will block our ability to provide learners with FETAC/QQI Awards.

We propose that there be a full exemption of fees for the community voluntary sector.

Additional impacts

It should be noted we feel there is very little flexibility in the system at present. If we are working with a community group and they identify that they want to do a FETAC/QQI component say in Leadership and we are not validated to deliver a component in this area, it would take a minimum of 6 - 9 months to have this validated. The validation process can also be very rigid and validation refused on a technical ground such as the timeframe for the component.

There is quite often difficulties with your IT systems (FBS) and your websites along with a lack of email communication/updates.

Kind regards,

Tom Kent

YMCA Ireland

Unit 1a Innishmore Industrial Estate

Ballincollig

Co. Cork