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ANALYSIS REPORT ON CONSULTATION PROCESS FOR NATIONAL ASSESSMENT PROCEDURES HANDBOOK

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1. National Assessment Procedures Handbook: Consultation Analysis

1.1 Background and context

One of the five goals within the FET strategy 2014-2019 is ‘Quality Provision - *that FET will provide high quality education and training programmes and will meet national and international quality standards.*’¹ The 2012 Qualifications and Quality Assurance Act 2012 sets out the detailed responsibilities that apply to the Education and Training Boards (ETBs) for quality assuring their programmes of education and training and related services. QQI has established Core Statutory Quality Assurance Guidelines² for providers, and new Sector Specific Quality Assurance Guidelines for the ETBs are expected to be established in 2017. The providers’, i.e. the ETBs’, assessment framework, incorporating the procedures and systems to ensure fairness and consistency of assessment, is a core element within the overall quality assurance framework.

ETBs are working collaboratively through the ETBI FET Directors’ Forum towards achieving the common goal of consistent high-quality standards in FET across the sector, through the development and implementation of a sectoral QA Framework. Learner Assessment is a core pillar within this framework.

The ETBI QA Strategy Group is overseeing the implementation of a number of collaborative sectoral QA projects, working in collaboration with ETBI QA forum, the Further Education Support Service (FESS) and other stakeholders. These projects include the proposed development of an ETB sector National Assessment Procedures Handbook.

1.2 Introduction

An ETBI National Assessment Procedures Handbook Working Group (see Appendix 1) has been established and has commenced development of a new sectoral assessment handbook. Phase 1 of the development (Dec ’16 – April ’17) focused on four assessment procedural areas which emerged, through consultation with the ETBI QA Forum, as priority procedures to be addressed. The Working Group having developed these four draft assessment procedures, sought feedback directly from the ETB sector and other stakeholders through a consultation process.

¹ <https://www.education.ie/en/Publications/Policy-Reports/Further-Education-and-Training-Strategy-2014-2019.pdf>

² <http://www.qqi.ie/Downloads/Core%20Statutory%20Quality%20Assurance%20Guidelines.pdf>

1.3 Consultation process

The focus of the consultation was on the outlined procedures and processes contained within four draft documents.

- 1. Assessment Deadlines**
- 2. Assessment Malpractice**
- 3. Compassionate Consideration in Extenuating Circumstances**
- 4. Reasonable Accommodation in Assessment**

The work took cognisance of existing good practice and experience of assessment processes across all provision in the ETBs, as represented by members of the Working Group. In this context, the material was developed and presented for consultation.

It was envisaged that this material, subject to consultation and the feedback received, would be included in a new sectoral Assessment Handbook.

1.4 Consultation Format

The consultation process was conducted in the period May - June 2017 and feedback was obtained through the following:

- Online questionnaires (see Appendix 1)
- Focus group meeting (based on the questions from online questionnaires)
- Direct submissions.

The online questionnaire was opened on 15th May 2017 and closed on 9th June 2017 hosted on the ETBI website. Focus group discussions took place in Portlaoise Education Centre on 8th June 2017. This was coordinated by FESS and facilitated by members of the working group. All ETB's were invited to nominate a representative/s to attend, of which 13 had representatives on the day. Direct submissions were also received by email. The remainder of this report provides greater detail on each of the consultation elements.

2. Feedback from the consultation

Overall, the need for common assessment procedures was welcomed by the sector. Constructive and valuable feedback was obtained through the consultation process. ETBI and in particular the Working Group members acknowledge and thank all stakeholders for engagement in this consultation process.

The following are some of the common topics emerging through the consultation process:

2.1 General Feedback

- The glossary of terms, and in particular, the variation in job titles, roles and responsibilities across the sector resulted in the need to assign roles rather than job titles to responsibilities outlined in the procedures.
- There was a mixed response in terms of level of detail required in these procedures. In general, feedback supported the specific nature of the procedures.
- There was general consensus on the benefit of having step by step procedures and processes to aid both the learner and staff in the sector.
- The feedback suggested that a localised approach to timelines on all procedures would be beneficial rather than a national approach.
- The planned development of separate handbooks, based on the procedures developed, for learners and staff was welcomed.
- A central ETB appeals procedure needs to be available for all procedures
- Concerns were expressed with regard to any requirements to implement what some perceived as 'centralised' assessment procedures, given the statutory independent authority of each ETB. But the need for consistency and commonality in approach was acknowledged.

2.2 Feedback: Reasonable Accommodation in Assessment

- AHEAD (Association for Higher Education Access and Disability) is a National Centre of expertise on Inclusive Educational Practice. AHEAD provided direct feedback through the consultation process on *Reasonable Accommodation in Assessment*. As highlighted by AHEAD, the term Reasonable Accommodation is embedded in National and EU equality legislation and is the cornerstone of the UNCRPD on human rights. The issue of reasonable accommodation in assessment is an element which needs to be considered within the overall context of catering for learners with disabilities including access to programmes; the provision of needs assessments for learners; reasonable accommodations within programmes; and, reasonable accommodations in assessment. Providing reasonable accommodations is a complex area and guidance is invaluable in making decisions about the process of assessing the needs of a learner and coming to a fair and transparent decision. As such, the sector requires supports for these learners such as those already provided at second level (SEC) and at third level (AHEAD).
- Staff resources (provision of qualified staff and training of staff) in the area of identification of assessment needs and provision of reasonable accommodation in assessment are required in order to provide reasonable accommodation for learners in

assessment. This is of particular significance in smaller centres. A centralised approach was suggested as a solution to this issue.

- Funding and associated costs in relation to reasonable accommodation in assessment needs to be examined. There are currently more resources and funding available at both second and third level.
- A question was raised in relation to the provision of exemptions from elements of assessment in some cases. This has been followed up with QQI and at present, no exemptions will be provided in QQI assessments.
- The question as to whether a waiver from the assessment of spelling, grammar and punctuation in language subjects are permitted which are evident in the second level system currently.

2.3 Feedback: Assessment Deadlines/Compassionate Consideration in Assessment in extenuating circumstances

- In terms of assessment deadlines, the feedback suggested that the issue of not accepting late submissions (where a deadline has been missed and/or there was no evidence of extenuating circumstances) was unfair to the learner, particularly in light of a system in higher education and training which generally penalises, but accepts late submissions. Feedback suggested that an approach which allowed for penalising late submissions was a fairer approach for all learners.
- Each assessment procedure drafted is based on the principles of assessment. In extenuating circumstances, some centres have the ability to provide an alternative assessment sitting (e.g. examination). The fact that this is not available nationally contradicts the principle of fairness to all learners in assessment.
- The issue of the diversity of the FET learner provided varied perspectives in terms of approaches taken to assessment deadlines. Some programmes required flexibility in terms of assessment deadlines in order to cater for the needs of their specific learners while others required a more rigid approach in order to ensure their learners were ready for further progression to higher education and training and/or industry.

2.4 Feedback: Assessment Malpractice

- The issue of staff malpractice in assessment is a consideration within the assessment process, however the general consensus is that staff malpractice in assessment should be removed from the Assessment Malpractice procedure. The procedure will be amended and will be entitled Learner Assessment Malpractice.

3. Progressing the work – Next Steps

3.1 Completion of Phase 1

The consultative feedback has been reviewed in detail by the Working Group for the four assessment procedure drafts. Some of the issues raised through the consultation process are not within the scope of the working group, this includes some of the feedback and recommendations on Reasonable Accommodation. The four draft assessment procedures are now being revised and finalised in light of the feedback received.

The independent statutory responsibility for learner assessment within each ETB is acknowledged. On behalf of the FET Directors, the QA Strategy Group is committed to supporting and enhancing consistency of assessment across the sector, this is the objective of the development of common assessment procedures. How the final procedures will be framed and published is being explored, the concept of an Assessment Reference Framework, with agreed common principles and definitions, supported by exemplar assessment procedures is being further scoped.

3.2 Development of two further priority procedures

Two further priority areas are currently under review by the working group:

1. Secure Storage of assessment material and learner assessment evidence
2. Examination Regulations

These will now be incorporated into Phase 2 of the project.

3.3 Phase 2: Next steps

Phase 2 of this project will commence in September 2017. This will involve:

1. The examination of and consultation around the two further priority procedures identified
2. Extracting an Assessment Reference Framework from the consulted Assessment procedures as a sectoral framework for ETB's.

3.4 Assessment Handbooks / Glossary of Terms

Assessment Handbooks for staff and learners will continue to be developed based on the finalised framework and exemplars as will the Glossary of terms.



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Appendix 1: Working Group

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Louise Clarke	Cavan and Monaghan ETB
Jenny Conroy	Education and Training Boards Ireland
Charles Gorney	Donegal ETB
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