

AEOA RESPONSE TO SOLAS CONSULTATION (12/01/2012)

Policy Area 1:

How do we administer and fund Further Education and Training in Ireland? (6 questions)

1. How can we use funding and administration structures to improve outputs and outcomes?

From an AEOA perspective:

In order to provide informed answers to these questions, it would have been useful to see the SOLAS Vision and Mission statements, clarifying the ethos, values and priorities of the new entity. We believe SOLAS must prioritise outcomes that go beyond the labour market activation agenda, to find a balance between effectiveness and equity in the new Further Education and Training sector. The design of funding and administrative structures must therefore also recognise the importance of outcomes in terms of citizens' personal and social wellbeing. It will be necessary therefore to:

- Capture both **qualitative and quantitative** outcomes that relate to the economic, social and personal wellbeing of job seekers and other learners. Funding by outcomes must recognise the totality of learners' life situations, as well as the range of different learner target groups and the wide diversity of learning needs.
- Make the shift from fragmented individualised programme budgets to **fully integrated budgets**, i.e.
 1. DES funds SOLAS
 2. SOLAS funds ETBs
 3. ETBs will have full autonomy and flexibility to manage and coordinate all public funding for further education and training in the region (including funding to local private providers). Funding will be allocated on the basis of a local development plan, informed by national and local intelligence, and framed within a single Service Level Agreement.
 4. Controller and Auditor General should conduct external audits on all Further Education and Training, including SOLAS and ETBs
- Provide for an '**Innovation Fund**' to promote innovation and creativity across the FET sector.

2. Is there a particular funding model which works best?

From an AEOA perspective:

- The ETBs should have **designated, overarching responsibility for all public funded FET provision** at local level, along with corresponding fully-integrated, multi-annual budgets. This funding model would have knock-on benefits in terms of the quality of FET provision, e.g. enhanced integration & cohesion, minimal duplication, transparent administration, etc.

In addition to funding allocated to ETBs for FET programmes in the region, each ETB must be allocated adequate **Core Funding** to enable it carry out the key functions associated with a modern FET organisation: e.g. Education Management, HRM, HRD, Finance, Strategic Planning & Development, ICT Development & Support, Quality Assurance, Risk Assessment, Buildings Management, H & S, etc. (see p. 6 of AEOA Position Paper, Nov. 2011 – <http://www.aeoai.ie>)

- The current public service approach to reducing costs, by reducing numbers employed, needs to be altered. As recommended by the National Competitiveness Council, January 2012 www.competitiveness.ie, ETBs could be **assigned pay budgets**, along with a set of output targets, and **allowed to allocate** and use these resources in ways that best meet the targets set.

3. How can we better measure value for money?

From an AEOA perspective:

What constitutes value for money for SOLAS will depend on the outputs and outcomes set down and the values attributed to each. While it is agreed that the labour market activation agenda is of utmost importance, personal and social outcomes must also be prioritised (See *Research on the Social Value of Community-based Adult Education in Limerick, Wider Benefits of Learning, 2011*)

- It is important that value for money audits take account of both **short term and long term benefits** (e.g. civic engagement, social inclusion and the wider benefits of learning). Looking only at the quantitative outcomes associated with the activation agenda would be short-sighted and perilous for our society as a whole.
- In addition to national targets, **value for money audits must also take account of customer satisfaction**. An effective “Learner Passport” system, based on the PPS number, that takes account of the goals of the individual, as well as public service goals, could be implemented to facilitate measurement of quality. An Individual Learning Plan agreed with the learner/client in the early stages of his/her engagement with NEES/ETB would identify positive outcomes to be measured against goals that are specific to the student as well as programme.
- Implementation of an effective national **“stakeholder satisfaction survey”**, similar to the UK’s Public Information Framework www.skillsfundingagency.bis.gov.uk

4. What criteria or requirements should be included in the Service Level Agreement?

From an AEOA perspective:

- **Service Level Agreements with ETBs** should relate to overall provision – not individual courses.
- All SLAs must be developed around key **Quality Assurance areas**, i.e.
 1. Communication
 2. Equality
 3. Access, transfer and progression
 4. Staff Recruitment and Development
 5. Programme development, delivery and review
 6. Fair and consistent assessment of learners
 7. Protection of learners
 8. Sub-contracting/procuring programme delivery
 9. Self-evaluation of programmes and services
- Where SLAs are being developed for individual / stand-alone courses, between ETBs and private providers, they should also include:
 - Purpose and definition
 - Provider QA details
 - Programme Validation details
 - Staff qualifications & experience
 - Budgeting and Reporting procedures / schedules
 - Internal and external evaluation procedures and schedules

5. How can we ensure an appropriate mix between public and private provision?

From an AEOA perspective:

- **ETBs should be the main conduit for integrated planning and funding of FET activities at local level.** Where a local LETB does not have the capacity or expertise to provide a programme, e.g. medical/pharma at higher levels, providers should be sourced through national tenders or through a local panel of approved providers. The local panel could be reconstituted every 2 or 3 years. This would ensure that the courses delivered by private providers are integrated within the overall local plan and that participants can benefit from additional supports such as adult literacy or guidance. Private expertise should be contracted, provided their quality assurance systems meet the same standards as those set for ETBs.
- As public service organisations, **ETBs must retain primary responsibility for the provision of FET at local level**, particularly for those adults who are most educationally disadvantaged. Private providers often have difficulties engaging this group. It must be recognised that ETBs have developed extensive experience and expertise in working with these target groups.

- There is often **duplication of provision and significant disparity in operational procedures** among public providers of education and training (e.g. Local Community Development Partnerships, Department of Justice programmes, HSE provision, etc). Therefore, there is a need to streamline the funding procedures used by different government departments and agencies.
- As ETBs will be the statutory agency responsible for integrated planning and funding of FET at local level, they should be responsible for **establishing and convening formalised partnership structures** to gather and analyse local labour market data. All the stakeholders in FET, including private providers, should be represented on these fora. (See p.9 AEOA Position paper, Nov. 2011 – <http://www.aeo.ie>).

6. How can we improve our IT systems in an integrated way while avoiding the risks associated with big IT infrastructure projects?

From an AEOA perspective:

The design of an IT system should be directly informed by the nature, purpose and extent of the structure it is supporting. Since the structure of the new FE sector is not yet in place, nor clearly defined, it is not possible to make useful comment on the IT systems required.

- The new IT systems must be centralised and led by DES, reflecting and supporting the new structures' goals and vision. With the establishment of new structures for the Further Education and Training Sector, we now have an opportunity to **start from scratch** to develop national ICT systems that work for all of the stakeholders involved: learners, administrators, policy-makers and practitioners.
- While the new IT systems should be informed by the **best** of what went before – it would be inadvisable to try to knit together the wide range of existing systems – many should be terminated.

Policy Area 2:

How do we decide what courses to deliver? (6 questions)

1. What information does SOLAS need to inform the delivery of courses and how can it access that information?

From an AEOA perspective:

- SOLAS must establish **effective two-way communication channels** with the EGFSN, Employer Groups and the NEES in order to 1) access up-to-date national & international labour market intelligence and 2) capture accurate data on learner experiences and statistics at local level (See p.9 AEOA Position paper, Nov. 2011 – <http://www.aeo.ie>).
- While some learner needs will undoubtedly be identified at national level (e.g. construction workers EGF Programme, Health Service workers' SkillVec Programme, etc), most learners/target groups will be identified first at local level. It will be necessary to **design local programmes** that address local needs, while also meeting the national economic and social agenda.

2. How can SOLAS encourage the design of new courses for the jobs of tomorrow?

From an AEOA perspective:

- SOLAS needs to promote and support a **ground-up, participative approach to innovation and the design of creative new courses**. ETBs should be lead partners in formal local structures established to gather local labour market information. This will allow for the development of bespoke education & training programmes, which can only be developed at local level (See p.9 AEOA Position paper, Nov. 2011 – <http://www.aeo.ie>).
- Need to provide local ETBs with an **"Innovation Fund"** to promote creativity across the FET sector.
- The development of Key Competences and transferable skills has been identified as a key area where FET has a distinct role to play. An effective strategy for the **integration of key competences**, including communications, learning-to-learn, inter-personal skills, social development, etc, within all courses must be designed and implemented.
- Effective design and delivery of new courses will be dependent on the **capability of staff at local level**. Therefore, there is a need for multidisciplinary core staff teams in each ETB, with high levels of competence in areas such as Curriculum Planning and Development, Teaching & Learning, Assessment, Monitoring & Evaluation; Learning Technologies (ICT), Guidance, Basic and Key Competence development (Maths, Literacy, ICT, Career Planning, etc). (See p.7 AEOA Position paper, Nov. 2011 – <http://www.aeo.ie>).

3. How can SOLAS encourage the appropriate provision of basic skills courses and provide for the important role of community education?

From an AEOA perspective: Community Education and Adult Basic Education are quite distinctive forms of adult education and need to be addressed separately.

1. Provision of Basic Education:

- Recognise the importance of **fundamental basic skills** (reading, writing, numeracy and using IT) **and key competencies** (communication, mathematics, digital competence, learning to learn, social and civic competence, initiative and entrepreneurship, cultural awareness and expression), for the jobs of tomorrow (See p.12 AEOA Position paper, Nov. 2011 – <http://www.aeoa.ie>).
- As part of its overall level 1-6 provision, SOLAS should ring-fence a **significant proportion of funding for programmes at levels 1 to 3** - both accredited and non-accredited. This will ensure the provision of both pre-development and basic skills acquisition for people with literacy issues.

2. Community Education

Community education currently takes place in two ways: outreach community-based provision provided directly by VECs and community education organised and provided by community groups, with support from VECs and other funders. The non-formal/informal learning supported by Community Education plays a vital capacity building role in meeting the needs of marginalized individuals and groups. As such, it must continue to be valued and supported through provision of funding and other resources, channelled through the ETBs.

- SOLAS must recognise the **role that Community Education** plays in terms of first step engagement of people who are disadvantaged and least likely to participate in education or labour market opportunities, and must **articulate this clearly in SOLAS Strategy and Vision** statement.
- **The support of non-formal community-based learning** (currently organised and provided by community groups with assistance from VECs) must continue as a critical part of the remit of the new ETBs. Non-accredited learning, provided through communities, is a vital and important part of the lifelong learning landscape, and as such must continue to be valued.
- It has been widely recognised that **community-based outreach provision** (i.e. programmes provided directly by VECs in consultation with local community groups, FRCs etc) is one of the most effective ways of engaging disaffected, **“hard to reach” adults** in learning and is critical element in the renewal and regeneration of local areas. This element of provision must, therefore, be retained within the remit of the ETBs.

4. What role can IT systems play in this? How can we improve our IT systems while avoiding the risks associated with big IT infrastructure projects?

From an AEOA perspective:

- A fit for purpose IT system would support the mapping of:
 1. The range of **FET course provision** (including private provision. Providers should use standard templates and headings to document their provision, enabling easy assimilation of data and providing clarity for prospective learners.
 2. **Employment opportunities** in local areas
 3. **Skill gaps** in local areas
 4. **Progression outcomes**
 5. **Location and density of key target groups/learners** living in specific geographic areas

Queries could then be drawn from this information to inform the design of systems, programmes and courses

- Support the development of **online learning opportunities** by improving IT infrastructure, including high speed broadband.
- Provide high quality, up-to-date **ICT training for all FET staff** to enable them use IT tools and facilities in innovative ways. SOLAS could liaise with the National Centre for Technology in Education (NCTE) regarding CPD for FET teachers and trainers.

5. There are a range of other providers of FET programmes - what way should SOLAS and LETBs engage or deal with those bodies to ensure a joined-up approach?

From an AEOA perspective:

- **All public funding for Further Education & Training should be channelled through the ETBs.**
- **Local panels of approved private providers** could be established by SOLAS and ETBs. ETBs would then be responsible for contracting and funding the most appropriate private providers, as necessary and in line with the overall local development plan.
- All providers: public, private and voluntary, should be represented on **formal local structures established** to gather local labour market information. These fora will be led by ETBs and should also include local employers, county enterprise boards, NEES, etc. The purpose of these fora would be to identify skill gaps, develop local FET development plans, monitor unemployment statistics and map FET provision and employment opportunities.

- Many of the current ad-hoc **Adult Education Boards** include representatives of employer organisations and local businesses. The remit of these Boards could be expanded to meet the needs of the new ETB structures.
- **A standardised national course description template**, for collection of comprehensive, up-to-date information on programmes and courses, must be agreed and used by all FE and HE providers. This will improve access to education and training information for all.

6. How can SOLAS encourage new programme delivery methods, like distance learning online provision, and what courses can be appropriately delivered through such methods?

From an AEOA perspective:

- The methods of delivery must match the learning needs of the specific group of learners (e.g. distance learning generally suits more motivated learners but is unlikely to be the best option for marginalised target groups). The new SOLAS structures must recognise the responsibilities of ETBs in this regard and must value and allow for **local responsiveness, creativity, flexibility and innovative approaches** to the design and delivery of all learning programmes ((See p.13 AEOA Position paper, Nov. 2011 – <http://www.aeoai.ie>).
- **Maximise the use and the potential of new technologies** to upskill ETB staff, promote learner autonomy and nurture a culture of innovation and research at local level. (See p.13 AEOA Position paper, Nov. 2011 – <http://www.aeoai.ie>). SOLAS could liaise with the National Centre for Technology in Education (NCTE) regarding CPD for FET teachers and trainers.
- **A range of blended learning methods and approaches** must underpin the delivery of all FET.
- **'Teaching hours'** should not be the primary basis for funding programmes, as they restrict the range of staff that can be employed, and ultimately restrict the approaches to delivery that can be adopted. Flexible budgets must be provided to allow for the employment of a wider range of personnel, beyond that of 'teacher' or 'trainer'. This will enrich the FET sector, by bringing expertise from industry, communities, etc to the design and delivery of new programmes.
- **Staff Development** is critical to support all staff in the newly merged structures and to ensure a common understanding of the adult education ethos, and the pedagogical approaches required to deliver FET courses in the 21st Century.
- E-learning objects/supports and other resources should be developed at national level, with a **library/repository set up to showcase and share good practice and innovative methodologies** (See p.13 AEOA Position paper, Nov. 2011 – <http://www.aeoai.ie>).
- **New models for the delivery of workplace learning** must be designed, based on partnerships that involve employers, FET providers and employees.

- A range of **innovative and relevant activities that help students learn about work** must be incorporated within all full-time and part-time education and training programmes. e.g. work experience, work placement, work shadowing, work simulations, mini-enterprise, etc. (See p.9 AEOA Position paper, Nov. 2011 – <http://www.aeo.ie>).

Policy Area 3:

How do we guide and support learners and potential learners in choosing the right course? (5 questions).

1. Do the benchmarks that the Group has set make sense?

From an AEOA perspective: **NO**.

- Because of the dominant focus on activation, there is **ambiguity in the wording of the benchmarks**. It goes against all of the key principles associated with voluntary participation of learners.
- **ETBs should not be the only providers named in the national referral system / protocol**. Many unemployed people would be more appropriately referred to 3rd level or other options. These benchmarks should apply to all providers (FE, 3rd level and private providers). For instance, all providers (not only ETBs) should publish their policies.
- Referral systems/protocols need to formally recognise that the NEES is not the only source of referrals for job seekers and other learners. Currently, the majority of VEC learners are not referred by NEES, but rather are referred through **community networks, word of mouth, or through local VEC promotional strategies**. These benchmarks should therefore accommodate **all learners, employed and unemployed**, whether they are referred by NEES, self-referred or referred by any other person/agency.
- The paper is not clear about who will be responsible for “initial assessment of client needs”. There is **need to differentiate between the “assessment” conducted in NEES and “initial assessment” responsibility of ETBs** and other providers. Assessment by NEES staff should lead to referral to a provider e.g. the ETB (levels 1 – 6) or local 3rd level providers (levels 6 – 10). The provider will then need to conduct initial educational assessment and guidance with learners referred to ensure that they are assigned to the most appropriate FET programme. (See p.10 AEOA Position paper, Nov.2011 – <http://www.aeoai.ie>).
- **The ETB or other provider in agreement with the learner, must remain the ultimate decision maker in relation to the individual’s needs and capacity to engage with a course.**
- While professional pre-entry guidance is undoubtedly critical for potential adult learners, so too is the **provision of on-going guidance throughout the learning journey**. (See p.10 AEOA Position paper, Nov. 2011 – <http://www.aeoai.ie>). A serious omission in this paper is the fact that it makes no mention of guidance provision on commencing a course, throughout a

course or on progressing from a course. This on-course guidance will have significant implications for the funding of guidance across the ETBs.

-

2. How can we simplify the system of eligibility criteria for different FET "programmes" so that we minimise perceived in the administration of income support and participant allowances?

From an AEOA perspective:

There should only be **2 sets of income support criteria**:

1. Criteria for Part time students
2. Criteria for Full time students

3. How can we marshal our often fragmented system of referral and guidance into integrated services while maintaining resources in critical areas?

From an AEOA perspective:

- A single, **coherent National Framework** for provision of all guidance, job search, and job matching activities must be developed, to oversee, monitor and support all career guidance outside the formal school system. (See p.10 AEOA Position paper, Nov. 2011 – <http://www.aeo.ie>).
- Effective and relevant **guidance support is necessary at 4 main stages** of the adult learning journey: 1) Pre-entry 2) Induction 3) On-Course & 4) Pre-Exit /Progression.

ETBs must liaise with NEES and SOLAS to clearly define the specific, but inter-dependant, guidance remits and roles of each agency. Transition needs to be seamless and based on the needs of the learners and current and future employers.

- Pre-entry guidance, which is independent, should be provided by fully qualified guidance personnel within the National Employment and Entitlement Service.
- Induction and on-course guidance should be provided by the ETBs for individual participants on their courses. They should also provide Career Management and Planning courses as mandatory components of all learning programmes.
- Progression Guidance should be initiated within the learning programme and continued through referral to other guidance providers (Job Placement Services, Higher Education Access Services, etc.) as appropriate.
- **Formal referral systems** must be established between 1) the National Employment and Entitlement Service (NEES) and SOLAS to inform future provision, and 2) the ETBs and the

local Employment and Entitlement Services to enhance the experience of job seekers and other learners, and maximise their progression outcomes.

- **Local Adult Guidance Partnerships**, which are representative of all providers of guidance and employment services and reflect local circumstances, should be established.

4. How do we address course placement based on course availability rather than participant needs or desires and continued delivery of courses that are not relevant to national skills needs?

From an AEOA perspective:

- **Programme reviews** (conducted by Qualifications and Quality Assurance Ireland) should be regular (every 3 years), as part of a quality assurance system that has the flexibility to allow change and adaptation of provision, as necessary (See p.12 AEOA Position paper, Nov. 2011 – <http://www.aeoai.ie>).
- **There is need to differentiate between the employment terms and conditions of core teaching staff in ETBs** (Maths, English, Science, ICT & Career Development, etc), who should be employed on an on-going basis, **and course specific staff** (specific skill / subject) who should be employed for the duration of a specific programme. It is essential that new ETB structures value and allow for local responsiveness, creativity, flexibility and innovative approaches to the delivery of all learning programmes. This includes allowing for the recruitment of appropriate staff to design, deliver, review and adapt course provision as necessary.
- The approach adapted to **curriculum development** will be critical. Course content, as set down in validated programmes for application across a range of settings, must emphasise indicative content, rather than more traditional prescriptive (text-book) content, which quickly gets dated. This puts more emphasis on tailoring of programmes to the needs of the target groups, the modes of delivery, and requires staff to continually update the content of their course, in line with changing labour market circumstances and demands (See p.12 AEOA Position paper, Nov.2 011 – <http://www.aeoai.ie>).

5. What do we need to do to ensure appropriate "tracking" of learners between NEES and LETBs and between LETBs to minimise information gathering and maximise progression opportunities?

From an AEOA perspective: SOLAS must articulate the **specific economic, social and personal outcomes** that it associates with progression.

- **A new tracking system** should be designed, based on these explicit outcomes. The Labour Market Activation Programme evaluation, (PA Consulting, 2011) said that *'to record progression outcomes, the feasibility of establishing shared databases across the key agencies along the progression pathway should be investigated, taking full account of data*

protection implications. It is important that such databases not only record completion, accreditation and progression but also gather robust information on drop outs from programmes'.

- The issues of **data protection**, which obstruct the effective exchange of key data must be addressed (e.g. using PPS numbers)
- If the system is to capture “progression” data in a coherent way, it must be **linked to the FETAC Business System and the DES Examinations Data Base.**

Policy Area 4:

How do we manage and support our staff? (3 questions)

1. What kinds of qualifications would be required of staff in the FET sector – pedagogical and otherwise?

(This question should have specified different categories of staff e.g. administrative, teaching, management, etc)

The set of qualifications necessary across the FET sector have been clearly outlined in a December 2011 EU document (<http://ec.europa.eu/education/more-information/doc/2010/keycomp.pdf>). DES and SOLAS should refer to this Report.

The following list specifies some of the general qualifications required in a FET organisation:

- Specific Subject / Skill qualifications
- Teaching qualifications
- Management & Leadership qualifications
- Range of ICT qualifications
- HR Management & HR Development qualifications
- Financial / Accounting qualifications
- Research & Development qualifications
- H&S, First Aid, etc qualifications
- Guidance & Counselling qualifications

Since many existing FET staff will require **upskilling**, relevant courses, compliant with Teaching Council requirements, should be developed. Options relating to the Recognition of Prior Learning (RPL) for tutors and trainers should be explored ((See p.7 AEOA Position paper, Nov. 2011 – <http://www.aeoai.ie>).

2. What kinds of skills would staff need, in terms of management, as well as delivering tuition?

From an AEOA perspective:

The following list specifies some of the skills required in a FET organisation:

- Curriculum Planning & Development
- Assessment
- Programme Design
- Programme Delivery – including use of digital media
- Monitoring, Evaluation & Review
- Strategic Planning
- Guidance / Integration of Key Skills
- Buildings Management
- HR Management

- HR Development
- Financial Planning
- Leadership

3. What should be the nature and extent of the SOLAS role in managing and supporting staff?

From an AEOA perspective:

- **SOLAS have no role in the management of ETB staff** but certainly could play a critical role in the development and support of FET staff
- **Develop a clear and appropriate staffing structure for the sector along with the right staffing profile** (See p.7 AEOA Position paper, Nov. 2011 – <http://www.aeoa.ie>) in consultation with DES, IVEA & ETBs. This could be informed, in part, by **an audit and analysis of the skills and qualifications of the existing staff** in the FET sector. This audit should be carried out by IVEA (funded by SOLAS) to establish the current capacity of the sector.
- Based on the results of that audit, establish an **appropriate CPD support system and annual CPD plans and funding** (See p.7 AEOA Position paper, Nov.2011 – <http://www.aeoa.ie>).
- The **notion of “frontline” needs to be revised** in the context of the current moratorium on recruitment of non-frontline staff and in line with the recent report of the National Competitiveness Council www.competitiveness.ie. The critical roles that existing VEC personnel, such as EOs, AEOs, ALOs, CEFs, etc, play must be acknowledged by policy makers.
- SOLAS should also promote and support **participative models of staff development**, such as communities of practice, programme design teams, etc (See p.7 AEOA Position paper, Nov. 2011 – <http://www.aeoa.ie>).

Final Questions

1. What can SOLAS do to improve customer service overall?

From an AEOA perspective:

- The SOLAS **definition of customers** must be articulated widely and clearly to include all stakeholders (i.e. learners, staff, employers, community partners, etc).
- Customer service can only be enhanced if there is **genuine customer participation and consultation**, which is conducted in an open, transparent and respectful manner with evidence of customer feedback being used to inform on-going development of FET. For instance, an effective national **“stakeholder satisfaction survey”**, similar to the UK’s Public Information Framework www.skillsfundingagency.bis.gov.uk, could be developed.

2. Should Youthreach and Community Training Centres be merged and should SOLAS continue to administer them?

- Should Youthreach and Community Training Centres be merged and should SOLAS continue to administer them?
- Do not merge.
- Solas should administer.
- Solas should not administer.

Comments:

From an AEOA perspective, there are a number of problems with the way this question about Youthreach and CTWs has been formulated:

1. To ask “*should SOLAS continue to administer them?*”, when SOLAS does not yet exist, leads the reader to believe that it was meant to read “*should FAS continue to administer them?*” Errors such as this just reinforce the broadly-held view that SOLAS is purely the continuation of FAS under another name. Serious efforts must be made, at national level, to dispel this view and foster public support for the new structures.
2. The focus of this question should not be on a “**merger**”, which often implies bringing together the worst as well as the best of the original entities. Instead, it should be concerned with the **establishment of a single, high quality, General Vocational Education and Training Programme for Early School leavers.**

Such a programme should be holistic in nature, and provide all learners with a **comprehensive initial induction programme** that combines a broad range of teaching, learning, development, guidance and assessment activities and experiences. Following induction, and with the support of professional guidance and assessment services, young learners would then choose to follow one of two progression routes: 1) General Education or 2) Vocational Training.

Since both Youthreach and CTCs provide alternatives to the formal second level school system, for young people who have left school early and are at risk of falling out of the education system completely, any new arrangement should be managed within the formal 2nd level school system, under the DES

3. Should FET delivered in specialised or atypical outreach settings like prisons or care services be managed by SOLAS or another Department or agency? [We assume that this question includes provision for people with disability.](#)

- Should FET delivered in specialised or atypical outreach settings like prisons or care services be managed by SOLAS or another Department or agency? Should be managed by Solas.

- Should be managed by relevant agency.
- Depends on nature of provision.

Comments:

From an AEOA perspective:

Learning should be central to the operation and development of **all** agencies, organisations and groups – public, private and voluntary. This is not to say that this learning should always be the responsibility of education and training departments and agencies. There is an onus on all government departments to promote and resource **learning related to their core business**, for managers, staff and clients on an on-going basis.

Where “learning” in any setting (local communities, prisons, voluntary organisations, etc.) is **1) directly concerned with providing opportunities for adults to progress in further education and training at Levels 1 – 6 and 2) organised independently of the organisation’s mainstream function/s**, then it should be funded through SOLAS and managed by the local ETB.

4. Any other comments?

From an AEOA perspective:

- **The points stressed and terminology used in this Paper disproportionately reflect the disbanded FÁS model** (‘jobseekers and other learners, customers’, labour market outcomes, etc), taking little account of the highly-regarded lifelong learning models and approaches adopted by the VEC sector (‘second chance learners, community education, social inclusion, core skills development’, etc). This creates the impression that VEC programmes, models and approaches are of secondary importance and therefore vulnerable in the new structures. This marked imbalance is regrettable and must be redressed in the forthcoming SOLAS Action Plan - achieving some balance between efficiency and equity. (Title - AEOA Position Paper, November 2011 - <http://www.aeoai.ie>).
- The **absence in the consultation paper of any clarity around SOLAS Values, Vision and Mission statements** made it difficult to answer the questions. It is important that SOLAS explicitly states whether, or not, its mission goes beyond the labour market activation agenda. This will have major implications in terms of the working definitions adopted for outcomes, outputs, progression, etc. Without an explicit vision, which all of the stakeholders buy into, the implementation of the SOLAS strategy will be piece-meal.
- The **omission of management issues from Survey Question 1 / Policy area 1**, even though it was mentioned in the consultation paper, is worrying. At this time, as a new further education and training sector is being created, management issues are as important, if not more important, than funding and administrative issues. Priority issues include the management & leadership of change and the creation of a new vision and a new culture. Ultimately, success or failure on these fronts will determine whether or not SOLAS and ETBs have credibility in the eyes of FET staff and the general public.

- It is important for the new entity to be cognisant of the important foundations established for the sector in the recent past (e.g. White Paper, EU research, etc), which have identified the **core principles of adult and further education and training** such as voluntary participation, the role of community education, etc. This critical thinking must provide the foundations for the new sector.