

## NALA response to SOLAS Legislation 12/04/2013

**The Further Education and Training (SOLAS) Bill 2013** provides for the establishment of an education and training authority (SOLAS) which will strategise for, co-ordinate and fund Further Education and Training (FET) in Ireland. The Bill also provides for the dissolution of FÁS. **Section 7** assigns a range of functions to SOLAS in relation to policy implementation, strategy development, programme development, funding and co-ordination of the FET sector. **Section 9** addresses the development of an FET strategy, and **Section 10** outlines the composition of the Board of SOLAS.

The Bill makes no reference to adult literacy and numeracy development. NALA believes that there is now an unprecedented and unique opportunity within the current reform of FET to legislate for raising adult literacy and numeracy levels and to reduce or eliminate the huge social, economic and personal costs associated with low literacy levels. **Section 7** should be amended to include the development of a strategy to raise adult literacy and numeracy levels. This would ensure the FET strategy is in line with national policy commitments on adult literacy. The functions of SOLAS make specific references to training for employment, participation of those on jobseeker's benefits / assistance and consultation with employers. The functions should be enhanced by including the personal benefits and social purposes of FET and by the greater inclusion of other public policy priority groups, particularly those who benefitted least from the education and training systems in the past. This is akin to the legislative function of the Higher Education Authority "*To promote the attainment of equality of opportunity in higher education*". **Section 9** should be amended to require SOLAS to consult with beneficiaries of FET (i.e. learners) in the development of an FET strategy. **Section 10** would be greatly enhanced by including a dedicated beneficiary / adult learner perspective at board level. This memo identifies how to enhance these three areas of the Bill.

### 1. Amendments to the functions of SOLAS to include development of an adult literacy and numeracy strategy.

- Add a specific reference to adult literacy and numeracy in 7.1(a), which deals with the development of an FET strategy

Adult literacy was first enshrined in government policy with the publication of the White Paper on Adult Education in 2000. As a result of the poor results for Ireland in the International Adult Literacy Survey (1997), adult literacy was designated the top priority in adult education. The participation target and new approaches to adult literacy outlined in the White Paper were largely successfully implemented within the envisaged timeframe. Since that time however, the next phase in the national response to raising adult literacy levels has lacked coordination and direction, despite policy commitments to the prioritisation of adult literacy, goodwill from decision makers and efforts by stakeholders. There is concern that adult literacy will continue to be overlooked as the new FET system emerges. Therefore specific reference in the legislation underpinning SOLAS is required to ensure there is a strategic and coordinated response to adult literacy and numeracy development.

There have been repeated calls for the development of a new national strategy for adult literacy and numeracy. The Houses of the Oireachtas have described adult literacy and numeracy levels in Ireland as "unacceptable"<sup>1</sup>. In 2011, the Houses of the Oireachtas reiterated the 2006

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<sup>1</sup> Houses of the Oireachtas Joint Committee on Education and Science (May 2006) *Fourth Report: Adult Literacy in Ireland*. Dublin: Stationery Office.

recommendation that “a National Adult Literacy Strategy should be developed and published as a matter of top priority”.<sup>2</sup> Minister Quinn identified to the Committee that this responsibility comes under the remit of SOLAS<sup>3</sup>, and indicated that “SOLAS making literacy central to training and retraining will begin to address the problem”. The creation of an adult literacy and numeracy strategy would also link with the National Literacy and Numeracy Strategy for Children and Young People to create, for the first time, a comprehensive and joined-up national approach to literacy and numeracy development for all ages. In addition this would provide SOLAS and the DES with a timely response to the results of PIAAC which will be published later this year.

Giving SOLAS a specific responsibility to develop a strategy to raise adult literacy and numeracy levels can be achieved by amending the legislation, and NALA proposes three options.

Proposed amendments in **red**

**Option 1.** Add a specific reference to adult literacy and numeracy in 7.1(a), which deals with the development of an FET strategy

7.—(1) The general functions of An tSeirbhís shall be—

(a) to prepare and submit to the Minister a strategy in respect of the provision of further education and training **including a strategy for the raising of adult literacy and numeracy levels** in accordance with *section 9*,

**Option 2.** Add a new function to section 7 that specifically references a strategy to raise adult literacy and numeracy levels.

**7.-(1) (x) to prepare and submit to the Minister a strategy to raise adult literacy and numeracy levels in accordance with *section 9*,**

**Option 3.** Add a new function to section 7 that references adult literacy and numeracy development.

**7.-(1) (x) to prepare and submit to the Minister a strategy in respect of the provision of literacy and numeracy education for adults in accordance with *section 9*,**

**NALA recommends Option 2.**

(Note: PIAAC is the Programme for the International Assessment of Adult Competencies, an international study carried out by the OECD in 2012. Using a representative sample, PIAAC has assessed the literacy, numeracy skills and problem solving skills of the Irish population and allows for comparison with the 1997 study. Results are due in October 2013.)

<sup>2</sup> Houses of the Oireachtas Joint Committee on Jobs, Social Protection and Education (December 2011), Heads of the Education and Training Boards Bill, 2011

<sup>3</sup> “policy development for literacy is best dealt with as part of...SOLAS” Minister Quinn, Joint Committee on Jobs, Social Protection and Education Debate. 25 January 2012

## **2. Amend the functions of SOLAS to ensure consultation with adult learners in the performance of its functions and in the development of the FET strategy.**

- **Add a requirement to consult with other stakeholders including adult learners in the development of FET strategy, in 7. 1(b),**
- **Amend section 9. (4) to enhance the development of an FET strategy by SOLAS, by adding a requirement to consult the beneficiary (e.g. adult learners)**
- **Amend section 9. (5) to include community and voluntary bodies.**

SOLAS should consult with adult learners – as the beneficiaries or clients of FET – in the development of the FET strategy. As well as contributing a learner / beneficiary perspective to the development of the strategy and its implementation, this would also address a key rationale<sup>4</sup> for the reform of the Further Education and Training (FET) sector, namely to be more learner-centered.

It would also assist SOLAS to direct resources to where they are most needed and redress the Matthew effect, whereby people who need the most assistance are the least likely to be assisted<sup>5</sup>. Promoting equality of opportunity and outcome for all groups would ensure the optimum impact of public FET resources for personal, social as well as economic purposes and tackle educational disadvantage. This would be more inclusive of priority groups, including those with literacy difficulties, low/no qualifications, early school leavers and NEETs (those Not in Education, Employment or Training) as well as the most vulnerable or hard to serve unemployed<sup>6</sup>.

The range of stakeholders that may be consulted in the development of the FET strategy should be extended to include community and voluntary bodies. Such groups include bodies' representative of adult learners and community education providers who have particular insights to the needs of learners. For example, NALA has regularly updated Guidelines for Good Adult Literacy Work, first published in 1985, which outline the principles and philosophy underpinning adult literacy development.

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<sup>4</sup> *In conclusion...the clear objective of this major change management process is to give increased focus to the needs of learners*" Department of Education & Skills presentation on future development of the further education and training sector to the Joint Committee on Jobs, Social Protection and Education 20/09/11.

<sup>5</sup> Kerckhoff, A. and Glennie, E. (1999), The Matthew Effect in American Education. *Research in Sociology of Education and Socialization* 12: 35-66

<sup>6</sup> National Skills Bulletin 2012, figure 9.10. See also CSO Q1 12 which identifies 43% of early school leavers 18-24 are unemployed. The unemployment rate for other persons 18-24 is 13%.

Proposed amendments in **red**

**7. (b)** to consult with the Minister for Social Protection, the Minister for Jobs, Enterprise and Innovation, **adult learners** and employers from time to time for the purpose of determining which, or which classes of, further education and training programmes should be the subject of advances by An tSeirbhís in accordance with *section 21*,

**9. (4)** An tSeirbhís shall, in the course of preparing a strategy under this section, consult with the Minister for Education and Skills, the Minister for Social Protection and the Minister for Jobs, Enterprise and Innovation **and bodies representative of adult learners**.

**9. (5)** An tSeirbhís may, in the course of preparing a strategy under this section, consult with training bodies, other providers of further education and training programmes, An tÚdarás um Ard-Oideachas, Enterprise Ireland, Teagasc, Quality and Qualifications Ireland, **community and voluntary bodies**, employers or any other person as it considers appropriate.

### **3. Amend section 10 to ensure the Board of SOLAS includes an adult learner perspective.**

- **Amend Section 10.(3) to ensure there is a dedicated adult learner perspective on the Board of SOLAS**

The specific inclusion of the service user perspective at the most senior level would significantly enhance the Board of SOLAS. A dedicated voice for adult learners on the Board would:

1. Contribute a learner / service user voice to the dialogue and decisions on the governance of SOLAS and to the development of FET policies and implementation.
2. Advance a key rationale<sup>7</sup> for reform of the Further Education and Training (FET) sector, namely to better serve clients and learners, by giving them a designated voice at the top table.
3. Improve the quality and effectiveness of education authorities, as outlined by Minister Quinn (5/7/12, Dáil QQI debate), and support the wider process of institutional reform of the FET sector in Ireland.

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<sup>7</sup> *In conclusion...the clear objective of this major change management process is to give increased focus to the needs of learners*" Department of Education & Skills presentation on future development of the further education and training sector to the Joint Committee on Jobs, Social Protection and Education 20/09/11.

Proposed amendments in **red**

10.(3) Of the ordinary members of An tSeirbhís, 9 shall be appointed by the Minister, following consultation with the Minister for Jobs, Enterprise and Innovation and the Minister for Social Protection, from among persons who in the Minister's opinion have experience of, and expertise in relation to—

(a) matters connected with the functions of An tSeirbhís, ~~or~~

(b) matters connected with finance, trade, commerce, corporate governance or public administration **or**

**(c) matters connected with adult learners.**

#### 4. Need for clarification on a definition of Further Education and Training

There is no definition of Further Education and Training (FET) in the Bill.

The legislation (Section 2) refers to further education as including *“further education provided for the purpose of obtaining an award within the meaning of the Qualifications and Quality Assurance (Education and Training) Act 2012 at a level that is not higher than level 6 specified in the National Framework of Qualifications...”*

However, this does not say what else further education can include or reference training.

If a definition of FET is included in the Bill, it should be framed to capture the wider purposes and benefits of learning, between Levels 1-6, as well as those captured through certification. This point is clearly encapsulated in the SOLAS Action Plan<sup>8</sup>:

*“A core distinction is between FET which is explicitly about “learning for jobs” where labour market outcomes are central in assessing its success, and FET which is principally about “learning for life” where outcomes other than labour market outcomes are the primary objective.”*

The definition of adult education in the White Paper (Learning for Life, July 2000<sup>9</sup>) is centred on the learner's *re-engagement* having exited from the system at an earlier stage in life. This includes any “systematic and deliberate learning undertaken by adults in a wide variety of settings and contexts, both formal and informal”, whether it leads to certification or not<sup>10</sup>.

The *Feedback from the SOLAS Consultation Process* June 2012<sup>11</sup> provides a range of definitions for FET, all of which reflect a broader and deeper understanding of further education than is included in Section 2 of the Bill.

<sup>8</sup> <http://www.education.ie/en/Publications/Policy-Reports/An-Action-Plan-for-SOLAS.pdf>

<sup>9</sup> [http://www.education.ie/en/Publications/Policy-Reports/fe\\_aduled\\_wp.pdf](http://www.education.ie/en/Publications/Policy-Reports/fe_aduled_wp.pdf)

<sup>10</sup> For example, certification is not a requirement to participate in Adult Literacy programmes.

<sup>11</sup> See [www.education.ie](http://www.education.ie)