



An Bord Oideachais agus Oiliúna Chathair Bhaile Átha Cliath
City of Dublin Education and Training Board

CDET B Submission in Response to QQI White Paper on QA Guidelines for Apprenticeship

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Issued by

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Nature of Consultation, Time Lines and Complexity of Apprenticeship Model

CDETБ welcomes the consultation process on the QQI White Paper on Quality Assurance Guidelines for Apprenticeship [published on the 22nd of January 2016] and the opportunity to make a written submission to same. An opportunity for direct engagement and discussion with QQI was also provided at the stakeholder consultation meeting in Dublin Business School on 28 January 2016. However, CDETБ takes the view that although the session was useful, it was not sufficient to address in full the complexity of issues arising from this White paper. The time line of less than one month was wholly inadequate for written submissions. This time line is particularly inadequate with parallel consultations taking place for QQI White Papers on Core QA Guidelines; Sectoral Guidelines and the new Validation Policy and Criteria.

QQI acknowledges in the White Paper that the apprenticeship learning mode is particularly complex taking in roles of '*multiple partners who contribute to the overall formation of apprenticeships*¹. CDETБ regards QQI as one of the key stakeholders in relation to ensuring the new apprenticeships are delivered for September 2016. However, these guidelines have been developed without the benefit of reviews and informed strategies having been issued from the Apprenticeship Council and SOLAS. The latter being the first provider for the existing apprenticeships regulated by statute. Each of these stakeholders are mandated by Government to fulfil certain roles and functions in terms of regulating and providing access to apprenticeships.

QQI has dual roles in relation to apprenticeships; firstly as the external quality assurance agency charged with reviewing and approving the quality assurance procedures of potential apprenticeship programme providers. Secondly, as the body with the authority to validate apprenticeship programmes leading to QQI awards on the National Qualifications Framework (NQF). These two roles are provided for in the Qualifications and Quality Assurance Act 2012 [hereafter known as the 2012 Act].

At the outset CDETБ commends the work by QQI in relation to apprenticeships, this has been necessary and important work to help move on the apprenticeship agenda to achieve the national and European policy goals of enhancing the status of VET within Ireland². CDETБ notes that the QA Guidelines on Apprenticeships would seem to be of a more comprehensive nature and are not confined to these two important but restricted roles. However, it is likely they will have to be reconfigured and refined as other key stakeholders issue their policies pursuant to their respective roles and authority.

CDETБ recognises the importance of quality assurance to ensure transparency and consistency in terms of the qualifications landscape achieving trustworthiness of qualifications on the National Qualifications Framework (NQF). Apprenticeships present added complexities in relation to quality assurance and therefore there must be clearly defined responsibilities and

¹ QQI White Paper on QA Guidelines for Apprenticeships, pg 11

² CEDEFOP – Spotlight on VET Ireland 2014 Report, <http://www.cedefop.europa.eu/en/publications-and-resources/publications/8075>

designated bodies³. This requires clear definition within the Irish context and adherence to same.

Development of Apprenticeships

CDETБ welcomes the expansion of the apprenticeship model and it is of the view that such a development will have a positive impact on enhancing the status of FET qualifications in Ireland⁴. It will also go toward addressing issues in relation to youth unemployment and a historical over reliance on construction related apprenticeships. Having the apprenticeships leading to QQI awards on the NQF is also a very positive development in terms of creating visibility for qualifications designed for the labour market further enhancing the status of FET qualifications⁵.

CDETБ concurs with the findings of the Apprenticeship Review Report⁶ which noted that Irelands existing apprenticeship programmes are viewed as being of a high quality and are recognised internationally providing graduates with a high degree of international labour market mobility. CDETБ Training Centres and the developed network of Senior Training Advisors (STAs) have been key components to the success of Irish apprenticeships. CDETБ would take the view that there are significant strengths within the system already including very developed institutional expertise in the form of STAs. These strengths should be built on and developed to ensure continued success for Irish apprenticeship programme graduates.

Status of QA Guidelines for Apprenticeships and Relationship to Core and Sectoral Guidelines

CDETБ understands that QQI has formulated these guidelines to be topic-specific and are to be used in conjunction with the Core and Sectoral QA Guidelines. CDETБ reasserts all observations, queries, contentions and requests made in our previous written submission in response to the QQI White Papers on the Core QA Guidelines and ETB Sector Specific Guidelines [submitted 5 February 2016]. The previous submission should be taken to underpin this submission without it having to be repeated here.

CDETБ is of the view that the QA Guidelines on Apprenticeship would be more appropriately classed as provider specific QA Guidelines rather than topic specific. The relevant aspects of the Core Guidelines subject to consultation and negotiation should be merged with the agreed elements of the Apprenticeship Guidelines. This would result in one set of guidelines applicable to any provider delivering an apprenticeship programme. This would ensure the complexities

³ Mayr, T. UEAPME Representative on the EQF Advisory Group – Relevant to Apprenticeships, Quality Assurance in Qualifications Frameworks, Conference Proceedings, Dublin Castle 12-13 March 2013

⁴ CEDEFOP – Spotlight on VET Ireland 2014 Report, <http://www.cedefop.europa.eu/en/publications-and-resources/publications/8075>

⁵ Mayr, T. UEAPME Representative on the EQF Advisory Group – Relevant to Apprenticeships, Quality Assurance in Qualifications Frameworks, Conference Proceedings, Dublin Castle 12-13 March 2013

⁶ <http://www.education.ie/en/Publications/Policy-Reports/Review-of-Apprenticeship-Training-in-Ireland.pdf>.

associated with the apprenticeship model are addressed in a more targeted, clear and coherent fashion.

Nature and Language of Guidelines – Broad v Prescriptive

CDETБ wishes to restate to QQI that the Guidelines should be broad in nature and not undertake to prescribe procedures. CDETБ understands that prescription may be well intentioned given the lack of detailed policies and procedures published as yet by other key stakeholders. However, the appropriateness of this must still be addressed.

CDETБ is of the view that the intended purpose of the QQI QA Guidelines is to inform the more detailed provider owned QA procedures. To this end CDETБ is of the opinion that parts of the Guidelines go too far in terms of the language used and the level of prescription. When contextualising the Guidelines in the White Paper QQI states *that 'it is necessary for QQI to be prescriptive in its quality guidance and procedures'*⁷. CDETБ challenges this assertion and argues that it is for the provider to develop their own QA procedures while having regard to QQI QA Guidelines. This level of flexibility is appropriate and will allow providers to develop their procedures in line with best practice emerging at EU and national level⁸.

CDETБ is of the view that prescriptive, narrow terminology and command directions/instructions should be avoided as this is not consistent with the 2012 Act. Section 28 of the 2012 Act provides that providers 'shall have regard to' QQI QA guidelines. CDETБ takes the position that there should be more of a focus on the description of features, characteristics and mechanisms which produce particular desired outcomes instead of prescribing specifically how the outcomes are to be achieved. This is done very well in some sections. However, the requirement that a Programme Board be established including its specific functions, and that a Programme Coordinator be appointed are examples of areas which are overly prescriptive. A more preferential approach would be to identify clearly what needs to be achieved within the system and then examples given of ways in which this might be achieved instead of prescribing a particular means of achieving it.

Again, the Guidelines on the pre-validation stage and other areas where programme validation is addressed are quite detailed and prescriptive. The specifics related to applications for validation of apprenticeship programmes would be more appropriately addressed as a section within the new Validation Policy and Criteria as provided for under Section 44 of the 2012 Act. A greater level of prescription is allowed for within the validation policy and criteria.

Reference is made to *'[t]he provider of 'on the job' periods....'*⁹. This would seem to be a reference to the employer, however, to avoid confusion the term 'provider' should not be used in

⁷QQI White Paper on QA Guidelines for Apprenticeships, pg 12

⁸ CEDEFOP, Handbook for VET Providers; supporting quality management and culture, Cedefop Reference series 99Luxembourg: Publications Office of the European Union, 2015, page 17

⁹ QQI White Paper QA Guidelines for Apprenticeship, page 32, para 2

relation to employers since it has a particular meaning under the 2012. The Employer's relationship with the apprentice is one of employment primarily.

Scope of the Guidelines

CDETБ takes the position that there needs to be more analysis and detail put forward on how the QQI QA Guidelines for Apprenticeships will interact with existing legislative provisions governing the existing apprenticeships. This should ensure complementary interaction and existing prescribed legislative roles, functions and powers are not encroached upon inadvertently. Again in light of the complexities clear role definition of the respective partners is essential.

CDETБ is of the view that there should be no devolution of corporate governance and administrative responsibilities which fall within the centralised remit of one of the other partners e.g. the Apprenticeship Council or SOLAS to another party albeit a Co-ordinating Provider or unit within such a provider.

For example it is specified that a Co-ordinating Provider *'will....establish a Programme Board that reports to the coordinating provider and is representative of employers and education and training advisors to advise on the programme proposal and operation'*¹⁰ [emphasis added]. The following is then prescribed: *"The Programme Board should....[e]stablish a system for market research and analysis including analysis of publications of manpower forecasting bodies"*¹¹ [emphasis added]. However, the Apprenticeship Review Group envisages that one of the main functions of the Apprenticeship Council will be to *'carry out research, evaluation and data gathering necessary to inform the national programme'*¹². CDETБ agrees with the findings of the Apprenticeship Review Group which assert that engagement with employers and potential apprentices and the collection and provision of data required for manpower forecasting should be carried out by a central coordinating service, not as a devolved function to all Co-ordinating Providers.

CDETБ is of the view that the QA Guidelines for Apprenticeships must be refined to ensure duplication is avoided and appropriate role definition is present in line with government policy.

Finally, in the Guidelines QQI states that the Guidelines *'apply directly to relevant providers'* or prospective relevant providers of an apprenticeship programme. *'Through these the guidelines apply indirectly to others involved in the provision of apprenticeship programmes'*¹³. CDETБ, requires clarification on the term 'others'; what other parties does QQI envisage the Guidelines applying to? It is CDETБ's understanding that the QA Guidelines under Section 27 of the 2012 Act can only apply to relevant providers.

¹⁰ QQI White Paper QA Guidelines for Apprenticeship, page 18, 3.7.3;part b

¹¹ QQI White Paper QA Guidelines for Apprenticeship, page 22, 3.7.7;part a

¹² <http://www.education.ie/en/Publications/Policy-Reports/Review-of-Apprenticeship-Training-in-Ireland.pdf>, page 9.

¹³ QQI White Paper QA Guidelines for Apprenticeship, page 8, 2.4, para 2

'On the Job' Training with more than one employer

The provision in the Guidelines that 'on the job' training could occur with more than one employer does allow for a greater degree of flexibility. However, from an operational perspective this presents real difficulties and it has not been the common practice with the existing apprenticeships.

Role of Senior Training Advisers (STAs)

As QQI is aware there currently exists an extensive ETB network of STAs. This is a considerable resource asset with substantial institutional experience and expertise. STAs on behalf of SOLAS manage the full portfolio of approved employers and their respective apprentices within their given region. The position held by an STA is provided for and regulated by statute.

STAs are essentially the linchpin between the employer, the provider and the apprentice. The following is a list of key functions which are carried out by STAs currently including but not limited to the:

- assessment and approval of employers
- approving and registering of new apprentices
- managing of apprentices who are changing employers
- provision of information and guidance to all apprentices
- monitoring of the apprentice and employer during the on-the-job phases
- maintenance of all apprentice and employer records for proof of educational attainment.
- management of payment to apprentices for the off-the-job phases. This includes apprentices attached to an ETB or IOT.
- assessment and approval of bursaries to female apprentices
- calling and the registration of Phase 2,4 and 6 apprentices attached to an ETB or IOT
- approval of apprentice certification and its associated costs
- preparation of any appeal by an apprentice or employer where an apprenticeship has been terminated by one of the parties.

This centralised service for national apprentices ensures consistency and coherency in terms of approach. This is an efficient model which has proven to be successful for the existing apprenticeships regulated by statute. The Apprenticeship Review Report clearly favours a centralised and co-ordinated approach to apprenticeship governance which supports both employers and apprentices¹⁴. Devolving these functions to each Co-ordinating Provider creates the risk of a disjointed approach that lacks consistency and coherency. CDET B would be of the strong view that this centralised model should be retained. It considered to be good practice for

¹⁴ <http://www.education.ie/en/Publications/Policy-Reports/Review-of-Apprenticeship-Training-in-Ireland.pdf>.

National Reference Points (QQI) of the EQAVET Framework to *'to build on and utilise what VET providers have already developed and have in place'*¹⁵ especially when they are clearly working well.

Conclusion

CDETБ appreciates the substantial amount of work and expertise which has gone into the QA Guidelines on Apprenticeship and regards them as a very positive and essential first step towards defining policy in the area.

CDETБ is of the view that the QA Guidelines on Apprenticeship need to be combined with the Core Guidelines establishing one set of provider specific QA Guidelines. These Guidelines should be refined to take account of the existing and emerging roles of other key stakeholders in particular the Apprenticeship Council and SOLAS; ensuring clear role definition is achieved and duplicity avoided. A centralised model for particular activities should be retained and supported in line with Government policy in this area.

The Guidelines should be pared back to broad guidelines which focus on the features, characteristics and mechanisms which should be addressed in the provider's QA procedures to achieve particular outcomes; ensuring achievement and enhancement of quality. Useful examples of how these outcomes could be achieved where appropriate should be included for guidance purposes only.

The scope of the Guidelines in terms of existing apprenticeships (already regulated by statute) and new apprenticeships and parties to be covered by them requires further clarification.

CDETБ is of the view that the existing centralised model of activities carried out by STAs should continue. These activities should not be devolved to all potential Co-ordinating Providers. This centralised model has a proven track record of success and which should be built on by the QA Guidelines for Apprenticeships.

CDETБ also takes the position that significant consultation is still required in relation to the issues highlighted above most of which have significant for the FET sector.

Finally, CDETБ require further and more detailed dialogue with QQI and the other key partners in this regard.

¹⁵Galvao, M.E., VET providers self-monitoring by using the EQAVET toolbox of indicators (A Guide for National Reference Points)