

SUBMISSION TO QQI CONSULTATION PROCESS

This submission represents Education and Training Boards Ireland (ETBI) response to QQI consultation paper:

- 1. WHITE PAPER ON STATUTORY QUALITY ASSURANCE GUIDELINES FOR APPRENTICESHIP**

[Published for consultation 22nd January 2016]

Introduction

ETBI welcomes the consultation process on the QQI White Paper: Statutory Quality Assurance Guidelines for Apprenticeship. In addition to the opportunity to provide a written submission ETBI acknowledges and appreciates the opportunity for direct engagement and discussion with QQI on the draft White Paper at the stakeholder consultation meeting in Dublin on 28 January 2016. A large number of ETB representatives were in attendance at this event. ETBI recognises the important purpose as outlined of these topical QA Guidelines for Apprenticeships as being ‘to provide guidance on good practice in the quality assurance of programmes for apprentice education and training and related services’ (p, 4). ETBI fully acknowledges that apprenticeships will only be successful if they are recognised as being of high quality and high value by all stakeholders. ETBI concurs with the Apprenticeship Review report¹ that ‘Apprenticeships should have a robust regulatory structure overseen by the State and operate in accordance with the quality assurance arrangements of Quality and Qualifications Ireland’ (p, 19-20), in that regard these topical QA Guidelines are welcomed.

ETBI understands that these topic-specific guidelines are to be considered in conjunction with the Core QA Guidelines. ETBI has made a formal submission on the Core QA Guidelines (submitted 5th February 2016). The observations and issues raised will not be repeated in this submission but are taken to underpin this feedback. ETBI would like again to express its concern at the volume of QQI White Papers and timeline for consultation allowed. ETBI would like to note that it has not had satisfactory time to fully consult within the sector on these draft guidelines.

Apprenticeship in the Education and Training Boards

The Strategic Review of Further Education and Training and the Unemployed (National Economic and Social Council – autumn 2013)² suggested that there is ‘scope for greater linkages between employers and providers...’ it also stated that ‘there is insufficient recognition of the potential of FET...’ (i.e. to meet skills demand) and that ‘employers’ awareness of their skills needs and of the opportunities offered by FET are poor’. ETBI recognise the potential and scope within the existing apprenticeship and new apprenticeship model for enhanced linkages, collaboration and partnerships between employers and education and training providers in particular the Education and Training Boards. The development and delivery of the new apprenticeship programmes and ensuring ongoing relevance and quality of established programmes will require education and industry to work closely together.

ETBI considers it important at the outset of this submission to highlight the role apprenticeship has played in Ireland as acknowledged in both the background issues paper³ and Apprenticeship Review Report: ‘the very high standard of apprenticeship training and education that has contributed greatly to the skills of our workforce... evident from Ireland’s track record in the World Skills competitions...the current system compares favourably with the best internationally...’

¹ <http://www.education.ie/en/Publications/Policy-Reports/Review-of-Apprenticeship-Training-in-Ireland.pdf>.

² <http://www.education.ie/en/Publications/Education-Reports/A-Strategic-Review-of-Further-Education-and-Training-and-the-Unemployed.pdf>.

³ <https://www.education.ie/en/Publications/Policy-Reports/Apprenticeship-Review-%E2%80%93-Background-Issues-Paper.pdf>

(p, 5 Background Issues Paper). The Review Report noted that ‘Ireland’s apprenticeship programme is viewed as being of high quality, and Irish apprentices are in high demand internationally’ (p, 18).

ETBI would like to highlight in particular the role and experience of the ETB Training Centres and network of Senior Training Advisors and their contribution to the high quality of established Irish apprenticeships.

Observations

Scope

ETBI understands the scope of the QA Guidelines for Apprenticeship as applying equally to new and to established apprenticeship. Whilst ETBI generally concurs with this scope it considers it important to explicitly acknowledge the statutory and legislative role of SOLAS for established apprenticeships, in particular with regards to the concept of co-ordinating provider as outlined in the draft guidelines. The guidelines state that ‘established apprenticeships are regulated by statute’ (p, 9), as this regulation includes the designation of SOLAS as the provider for established apprenticeships, ETBI is of the view that this should be explicitly referenced.

Definition of Occupational Profile

ETBI would propose QQI consider a broader definition of occupational profile to include not just the knowledge, skills and competences, but as reflected in the UK Trailblazer apprenticeships⁴, the knowledge, skills and behaviours that an individual needs to be fully competent in an occupation.

Co-Ordinating Provider and Governance

It is acknowledged that the regulation of apprenticeship is outside the scope of the guidelines and not a function of QQI (p, 9). ETBI fully concurs with this but would have some concerns with regards to the role and scope of authority mapped out by QQI for the co-ordinating provider. The operational role of the coordinating provider as detailed in particular on pages 18 and 19 of the document would seem to incorporate governance and administrative activities which are outside the scope of quality assuring the programme and the expected requirements of an external awarding body. ETBI is concerned that QQI is advertently impacting the administrative and governance structure for new apprenticeships in particular.

The Apprenticeship Review Report noted that ‘SOLAS should continue to be the national authority with legal responsibility for administration of apprenticeships, while providing for more plural governance arrangements in the future. The principle of subsidiarity should apply to operations to the maximum extent feasible, with curriculum development and programme delivery being devolved through SOLAS to Education and Training Boards, or to higher education institutions, depending on the level of the programmes’ (p, 8). ETBI accepts the application of this principle of subsidiary for curriculum development and programme delivery in the role of the coordinating provider in quality assuring the development and delivery process and in ensuring the involvement of relevant stakeholders as outlined in the draft guidelines. The critical role of the programme board as outlined in the guidelines document in all elements of quality assurance necessary for the curriculum development and programme delivery processes is recognised.

⁴ The future of Apprenticeship in England Guidance for Trailblazers from standards to starts: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/487350/BIS-15-632-apprenticeships-guidance-for-trailblazers-december-2015.pdf

However ETBI is concerned that some aspects of the operational role attributed by QQI to both the coordinating provider and programme board form part of the administration and governance aspect of apprenticeships which should be determined by the Apprenticeship Council, and which ETBI propose should be incorporated within an overarching central entity such as SOLAS. The review group envisaged an enhanced role for the Apprenticeship Council outlining its main functions as being to advise on... 'the design, duration, entry levels, and ongoing provision of apprenticeships...in line with national needs, ensuring optimum quality, efficiency and effectiveness....the introduction of apprenticeships in new occupations...numbers of apprenticeship places to be provided in various occupations based on sound labour market intelligence and manpower forecasting... and to 'carry out research, evaluation and data gathering necessary to inform the national programme'... It also stated that 'the Council will also be responsible for advising on a strategy to assist in providing alternative placements in the event of apprentices being made redundant during training' (p, 9).

ETBI supports the view as reflected in the review group report that a central coordinating service or entity is needed to engage with employers and potential apprentices and to provide the coordinated research and data necessary for manpower forecasting. It would suggest then that these functions are not appropriate to either the coordinating provider or programme board. By attributing such functions to the quality assurance of the programme development and delivery ETBI is concerned that the draft guidelines impact on the processes for national governance and coordination of apprenticeship.

Role of ETB Senior Training Advisors

The Apprenticeship Review Report proposed that 'SOLAS will maintain a national register of apprentices for the purpose of planning and management of overall apprenticeship numbers. This should be based on data transfer from Education and Training Boards and higher education institutions' and that 'SOLAS will maintain a publicly accessible national database of employers approved for apprenticeships, based on data transfer from ETB' (p, 9)⁵.

Within the established apprenticeships ETBI would like to highlight in particular the important role of the ETB network of Senior Training Advisor (STA) in managing, supporting and administering a portfolio of apprentice approved companies and apprentices within their region on behalf of SOLAS. STAs currently operate under a certificate of appointment as Authorised Officers by the Chief Executive Officer of SOLAS under section 43 of the Industrial Training Act 1967, as amended ("the Act"). The Senior Training Advisors (in conjunction with their Clerical Officer support) play a hugely important and objective role and are a critical link between the provider, the apprentice and the employer. They currently carry out a range of functions on behalf of SOLAS including, but not limited to:

- assessing and approving companies to register apprentices
- approving and registering new apprentices and apprentices changing employers
- providing an objective information and guidance service to all apprentices registered
- monitoring of companies during the apprentices on-the-job phases
- assessing and approving the payments of bursaries for female apprentices
- payment of apprentices for the off-the-job phases both in the ETB's and the Institutes of Technology

⁵ <http://www.education.ie/en/Publications/Policy-Reports/Review-of-Apprenticeship-Training-in-Ireland.pdf>.

- calling and registration of Phase 2, 4, 6 apprentices in ETB training centres and Institutes of Technology
- approval of apprentice certification and its associated costs
- preparation appeal by an apprentice or employer to the termination of an apprenticeship
- maintaining apprentice and employer records

As proposed in the Review Report ETBI would like to highlight the need for a coordinated and national system of governance to engage with and support both employers and apprentices. The central coordination complements the quality assurance process but it should not be embedded or bolted on to the programme development and delivery process. ETBI would propose that the network of ETB senior training advisors provide both objectivity and efficiency in coordination and supports and would have concerns about the devolvement of this role to different coordinating providers. This would lead not only to the necessity for increased resources and investment of these individual provider groupings but also a high risk of a fragmented national apprenticeship system.