



# ETBI Submission on the QQI White Paper – Inaugural Review of Quality Assurance in Education and Training Boards

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## Preface

The summary observations and recommendations in this response to the QQI White Paper – Inaugural Review of Quality Assurance in Education and Training Boards<sup>i</sup> have been compiled by ETBI in collaboration with colleagues from across the ETBs.

This feedback reflects the observations and views of colleagues in ETBI and the ETBs on engagement with the White Paper, and from the ETBs discussions at Dialogue meetings with QQI. It focuses on the Model and Policy in the context of Further Education and Training (FET) and documents any items of concern and proposed next steps to support the implementation of this model for Review.

Specific feedback and observations were communicated to ETBI by a number of ETBs through the QA Network and QA Strategy Group discussions and through a sectoral template which was developed to assist ETBs in collating feedback from other colleagues. To ensure the views within these submissions are reflected, they are included in full throughout the body of this document.

## 1. Introduction

Education and Training Boards Ireland (ETBI) is the representative body for the 16 Education and Training Boards (ETBs). ETBI welcomes QQI's' White Paper on the Inaugural Review of Quality Assurance in Education and Training Boards which at the outset recognises the quality assurance responsibilities of ETBs as significant public providers of further education and training.

ETBI also welcomes QQI's reference within the White Paper of each ETBs completed re-engagement process with QQI and established quality assurance (QA) policy and procedures in accordance with section 30 of the Qualifications and Quality (Education and Training) Act 2012, and that the ETBs related policies and procedures are reflective of the evolving and developmental nature of quality assurance within the ETB sector as it continues to integrate legacy processes.

The publishing of the White Paper has also provided for opportunity's for focused sectoral discussions concerning External Review within the context in which ETBs operate and during these discussions has further strengthening the ETBs understanding and acknowledgment of their obligation as quality assured providers in preparation for, and engagement with External Quality Review as outlined in the 2012 Act.

The commitment among the Executive leadership of ETBs to support the development of and release of their staff to engage in Professional Development initiatives in the coming months in Governance and Management of Quality is further acknowledgment and recognition of the ETBs commitment to preparing for and comprehensively capturing the necessary processes and guidelines within their Quality Assurance Policy and Procedures.

It is also important to acknowledge that more detailed development is underway within the ETB sector in collaboration with QQI in exploring further this Model for external review, in the establishment of a QQI ETB ETBI collaborative working group, who will begin progressing the detailed arrangements necessary to support this Model and Policy, strengthening QQI's and the ETBs commitment to ongoing consultation and engagement.

It is also welcomed that following consideration of the outcomes of this consultation process and further policy refinements, adoption and drafting by QQI that an implementation plan will be developed in collaboration with the sector through the collaborative working group above.

## 2. ETB Background and White Paper Focus

The 16 Education and Training Boards provide a diverse range of further education and training programmes, including pre-2016 and new apprenticeship within an equally diverse range of centres contexts and learners. The ETBs were established in 2013 following an amalgam of former VECs and FÁS.

As relevant providers in the Qualifications and Quality Assurance Act (Education and Training) 2012 and noted in the White Paper, ETBs have agreed their quality assurance procedures with QQI, including those policies and procedures related to:

- Governance, planning and management of quality;
- Programme development, approval and review;
- Public information and communications;
- Teaching and learning;
- Assessment;
- The learner experience and learner voice;
- Information and data management;
- Collaborations with other ETBs, other providers, partners, awarding bodies and stakeholder relationships.

The focus of the quality assurance review of each ETB as detailed in (Section 2.3) of the White Paper will be an evaluation of the comprehensiveness and effectiveness of all of the ETB's quality assurance procedures, with specific focus on the above and will do so by examining the design and planning of existing internal quality processes and their consistency with QQI's Core, Sector-Specific and Topic-Specific quality assurance guidelines.

### 3. White Paper Observations and Recommendations

The principles underpinning the external quality assurance review and its purposes as outlined in (Sections 2.1 and 2.2) of the White Paper are clear. They provide a framework within which ETBs can engage in an external quality review of the effectiveness of its quality assurance procedures in compliance with statutory obligations. However, it is important that at all times the differentiation between ETBs is acknowledged, as noted in (Section 3.1.) ETBs differ in size, scope, demographics, provision/employment opportunities.... therefore, making comparisons between the ETBs unreliable.

The review framework proposes to ensure consistency among all ETBs carrying out their external quality review. The proposed single model with flexible features (Section 3.1) is commendable as it allows for the variation which exists between ETBs, and it supports efficiencies in the review process. The policy document does not prescribe detailed measures to conduct reviews (Section 1.3); this gives each ETB the autonomy to create bespoke procedures specific to its further education and training provision where differences apply. However, a more detailed implementation plan as discussed earlier would be welcomed.

(Section 3.2) refers to comparability across the sector. This is at odds with the acknowledged variations between ETBs (Section 3.1) making any comparisons unreliable and also unwelcomed. It is understood however, after initial discussion with QQI, that this section is concerned with consistency and diversity of Quality not comparability of ETBs and it is therefore recommended that any references to comparisons/comparability be renamed /redrafted accordingly.

An external review of quality assurance is new to ETBs. Therefore, ETBs will need time to consider, develop and implement appropriate procedures. Any proposed implementation plan and associated timelines would need to reflect this. It is further recommended that QQI considers altering the Omnibus approach proposed in (Section 1) to a more staggered engagement process, allowing for those first prepared ETBs to take the lead followed shortly after, and in a pre-arranged manner by others. This approach has been adopted successfully across the sector in other areas which strengthened the associated processes by allowing time for valuable learning and necessary refinements along the way.

It is acknowledged also that a primary purpose of the Individual ETB Quality Assurance Review Reports and the Sectoral Report which will be published as a result of implementing the review should contribute to a better understanding within the sector of the importance of monitoring, documenting and improving the quality of provision of further education and training. The review will also provide greater transparency and accountability to stakeholders of all further education and training activities. The composition of the Review Teams therefore will require careful consideration to ensure consistency and richness of review approaches across ETBs, it would therefore be welcomed if QQI staff members formed part of these review teams to support this consistency in the first instance. Additional questions regarding the remaining composition of the review teams have been raised which will require further consideration by QQI and the collaborative working group; will teams be based on the profile of the ETB?, will they visit single or multiple ETBs with similar profiles?, will the teams comprise ETB FET Staff? It is important that the review team as described in (Section 3.4) includes representatives with a breadth and depth of understanding of further education and training in the ETB sector.

Additional, further detail relating to the Sectoral Report including its composition, its driver, its target audience and any necessary stakeholder involvement or meetings, would also be welcomed by the ETBs as currently in the White Paper very little is drafted.

While this is new to the ETBs it is also acknowledged that this is a first review in this manner of the sector by QQI, and time will need to be dedicated to necessary self-evaluation and review of the review Model and associated QQI processes by QQI. A Self-evaluation report of the above would therefore be welcomed by ETBI and the ETBs from QQI post review events.

## 4. Summary

ETBI and the ETBs acknowledge the ongoing and collaborative working relationship with QQI across many areas of Quality Assurance including programme development and validation, and look forward to, and welcome, further collaboration and partnership with QQI in the context of Reviewing Quality Assurance in the ETB sector.

ETBs have a long history and culture of collaboration and partnership, as briefly outlined above in their commitment to collectively support the development of their staff in preparation of this process, and in the collaborative infrastructures that have been put in place through the FET Directors Forum and QA Strategy Group to continue to work with QQI in the context of this Model for Reviews, further acknowledgement of their commitment to address any development or enhancement initiatives for the sector that arise from this process.

While it is acknowledged by the sector that there are some questions to be answered regarding some items within the White Paper, they remain open to the Review process and confident that all will be clarified in advance of commencement. ETBI and the Sector also look forward to the outcomes of the ongoing collaborative detailed development.

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<https://www.qqi.ie/Publications/Publications/White%20Paper%20Inaugural%20Review%20of%20Quality%20Assurance%20in%20Education%20and%20Training%20Boards.pdf>