



**QQI**

Dearbhú Cáilíochta agus Cáilíochtaí Éireann  
Quality and Qualifications Ireland

QQI COMPREHENSIVE POLICY DEVELOPMENT PROGRAMME

# FEEDBACK REPORT

FOLLOWING CONSULTATION PROCESS ON

White paper on Topic-Specific Statutory

Quality Assurance Guidelines for Apprenticeship

JUNE 2016

## Contents

1. INTRODUCTION.....	3
2. CONSULTATION PROCESS .....	3
3. SOURCES OF FEEDBACK .....	5
4. SUMMARY OF FEEDBACK.....	6
5. POLICY ON QUALITY ASSURANCE GUIDELINES .....	8

## 1. INTRODUCTION

In December 2015 and January 2016, QQI published a series of draft quality assurance guidelines (white papers) for public consultation. Statutory quality assurance guidelines set out those elements which providers will have regard to when establishing, or updating their own quality assurance (QA) procedures in order to have such procedures approved by QQI (with the exception of the previously established universities). The white papers contained proposed policy for core statutory quality assurance guidelines applicable to all providers and sector-specific and topic-specific guidelines. The white paper on Topic-Specific Statutory Quality Assurance Guidelines for Apprenticeship Programmes was published for consultation in January 2016. The consultation process was open until 15 February 2016.

This report sets out a summary of the consultation process and the approach towards the feedback received via the consultation process on Topic-Specific Statutory Quality Assurance Guidelines for Apprenticeship Programmes. It sets out the response of QQI to that feedback and the steps in the finalisation of policy and guidelines for quality assurance. This report does not capture the full extent of every comment made by each contributor in the consultation process, but it does try to capture the most salient points and the areas for action by QQI. The feedback received on the White Paper was used to inform the development of the Quality Assurance guidelines.

## 2. CONSULTATION PROCESS

The QQI consultation events addressed a range of issues and queries ranging from the visibility or lack of visibility of the employer-led intention of the apprenticeship scheme and the perceived dominant role of the coordinating provider; to the awarding of qualifications and the type of certification that would result where a consortium includes more than one awarding body. Formal written feedback from stakeholders addressed issues relevant to the agency/organisation which made the submission.

The employer and provider submissions focus on governance and on the impact the guidelines will have on where decision-making takes place. Other submissions focus on learner support and disability.

Many of the issues addressed by the provider and employer representative organisations can be addressed together, while recognising the differing perspectives of these organisations. The

provider submissions are broadly supportive of the same concepts as those of employers and the issues they raise can be addressed by the same solutions. The following attempts to capture the majority of the overall responses, all of which will be published unless otherwise stated by the respondent.

**Table of consultation events with QQI stakeholders**

Consultation event with:	Date/Location	Participants
<p><b>University QA officers</b> On (Core, Sector-Specific and Topic-specific FDL/apprenticeship)</p>	<p><b>Monday 25 January 2016</b> University of Limerick</p>	<p>University Quality Officers</p>
<p><b>DES (HE &amp; FE)/Solus/HEA</b> on all QA Guidelines/Validation Policy – Impact and expectations</p>	<p><b>Wednesday 27 January</b> QQI offices, Behan House</p>	<p>A number of representatives from SOLAS; one from the HEA; and four representatives from the Dept. of Education and Skills – FE and HE</p>
<p><b>Prospective providers/stakeholders for apprenticeship</b> (core/ apprenticeship)</p>	<p><b>Thursday 28 January</b> Dublin Business School</p>	<p>Approx. 76 attendees from: ETBs, further and higher education colleges, IoTs, universities, apprenticeship groups, private companies, representative bodies (such as the Insurance Institute of Ireland; Certified Public Accountants; Accounting Technicians Ireland; Restaurants Association of Ireland; Irish Hotels Federation; Financial Services Ireland; Irish Tax Institute; Association of Freelance Editors; IRHA; IMDA Skillnet) and other stakeholders (HEA; SOLAS; ETBI)</p>

<b>Consultation event with:</b>	<b>Date/Location</b>	<b>Participants</b>
<b>Private/Independent Providers</b>  Validation Policy  Core/Sector-Specific/Topic-specific FDL and Apprenticeship	<b>Friday 29 January</b> Ashling Hotel, Dublin	Approx. 80 attendees  approx. 65% were from further education and training  approx. 35% were from higher education and training
<b>Linked Providers (in parallel)</b>  Core/Sector-Specific/Topic-specific FDL and Apprenticeship	<b>Friday 29 January</b> Ashling Hotel, Dublin	Approx. 29 attendees  approx. 55% were from a DAB  approx. 45% were linked providers (IMI, IPA, IOB, RIAM, CDET, BIMM, Defence Forces, Marino Institute etc.)
<b>HECA</b>  QA suite and Validation	<b>Monday 1 February</b> QQI Boardroom	Six representative of Private Higher Education Providers
<b>USI</b>  QA suite and Validation	<b>Friday 5 February</b> USI offices in Ringsend	Meeting with the President of USI and the VP Education
<b>ETB Group under ETBI</b>  (core and suite of QA guidelines)	<b>Wednesday 17 February</b> Pipers Hill - NAAS	6 representatives of the ETBs and the ETBI rep

### 3. SOURCES OF FEEDBACK

Feedback on the White Paper on Topic-Specific Statutory Quality Assurance Guidelines for Apprenticeship Programmes was received from a range of institutions, representative bodies and other stakeholders. Feedback was received from the following:

- City of Dublin Education and Training Board
- Education and Training Boards Ireland (ETBI)

- IBEC (IMDA endorsement of response)
- Institute of Technology Sligo
- Institutes of Technology Ireland (IOTI)
- Irish Small and Medium Enterprises Association (ISME)
- National Adult Literacy Agency (NALA)
- National Association of Principals and Deputy Principals (NAPD)
- SOLAS

#### 4. SUMMARY OF FEEDBACK

Feedback indicates that the draft guidelines do not give sufficient weight to the apprenticeship review recommendations that new apprenticeships should be employer-led; including in terms of the occupational definition; the establishment of standards; and the development of curricula.

Concerns are also expressed that, over time, the central role of the coordinating provider will result in apprenticeship programmes evolving to become provider-focussed. Consequently, recommendations arose that the development consortia should continue to have an existence during the validation and operational phase, and to retain an overall governance role and a role in the review of standards during the operational phase.

Other feedback indicates concerns that the particular capacities and limitations of SMEs will not be adequately represented during programme development and delivery and that an over-reliance on large company philosophies and systems could inhibit the growth of apprenticeship within the SME sector.

There are also concerns expressed about:

- The governance systems becoming bureaucratic, making it both expensive and impractical for SMEs to participate fully. Particular points include the employer's training expertise; onerous criteria preventing SME recruitment; and the need for appeal mechanisms,
- Demand/supply smoothing with greater freedom for employers to recruit as they desire,
- The rigidity of consortia, and
- The data protection issues where there are multiple providers.

Employers' feedback also indicates a number of items where they feel that the functions of the Programme Board are unnecessarily extended. This includes brand management, manpower planning and market research.

While welcoming the broad thrust of the proposals, the providers identify a number of the same issues raised by employers. A dominant theme in the provider feedback responses relates to Governance. Some feedback was founded on the 1967 Apprenticeship Act and the role it confers on SOLAS. It also seems to imply a regard for the interim Apprenticeship Council as a statutory body. Feedback also referred to the relationship between roles of the various state agencies and their respective statutory and operational roles in both governance and operational matters. In this context, the feedback raises an important point, that neither Programme Boards nor Consortia are free agents and should not operate in an overall policy governance vacuum. There is a view that QQI is inadvertently impacting the administrative and governance structure for new apprenticeships, quoting the Review recommendation 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. Provider feedback places an emphasis on the role of Senior Training Advisors (STA) in managing the relationship with employers.

#### QQI Response

From a quality assurance accountability perspective, the draft Quality Assurance Guidelines on Apprenticeship focussed primarily on the role and responsibilities of the Coordinating Provider. The final guidelines clarify more strongly from the outset that it is expected that consortia will be established in order to meet the needs of employers and that they are often initiated by employers and employer representative bodies. As noted in the feedback received, this demand-led enterprise-led approach was a feature of the apprenticeship review and is wholly appropriate to the nature of apprenticeship.

The governance of apprenticeships, outside of quality assurance matters, is continuing to evolve as collaborative discussions with other state organisations has progressed and is being facilitated under the Apprenticeship Council. The roles of SOLAS, the HEA and the Apprenticeship Council in relation to apprenticeship continue to evolve and the revised quality assurance guidelines for apprenticeship programmes will signal the importance of providers, awarding bodies and consortia being aware of the wider context in which apprenticeship programmes are being developed, overseen and revised. Some of the clarity that is emerging in this regard is reflected in the final Quality Assurance Guidelines for Apprenticeship Programmes, and includes the approval of occupational profiles by the

Apprenticeship Council and its role in the inclusion of additional providers in consortia and the role of SOLAS as statutory regulator under the 1967 Industrial Training Act. The nature of apprenticeship requires a close partnership between employers and providers and the proposed QA procedures include a much richer role for the provider in the partnership of the 'on-the-job' and 'off-the-job' experience, than is usual in academic programmes. This requires occupational expertise on the part of those who assess each aspect of the programme. The Apprenticeship Review and the QA guidelines envisage a very dynamic situation and require employer inputs, and educational/training and craft competence in the programme management.

In terms of the role of the Programme Board: from a quality assurance perspective, the existence of entities such as Programme Boards are essential for ensuring the appropriate oversight of all aspects of a given programme. These structures are considered equally and in some regards more applicable to apprenticeship as the objective is to ensure that the on and off-the-job elements combine coherently in order to enable an apprentice to demonstrate that he or she has met the intended programme learning outcomes. Some modifications are made to the role of the Programme Board, in the final quality assurance guidelines, to reflect the evolving roles of the consortia in the wider governance of apprenticeship.

It is important to acknowledge that the establishment of additional apprenticeships is a new enterprise and we will undertake to review the quality assurance guidelines when we have collectively better understood their application to this new context. QQI will continue to engage with core stakeholders on the implementation of the QA guidelines for apprenticeship.

## 5. POLICY ON QUALITY ASSURANCE GUIDELINES

The published version of the Topic-Specific Statutory Quality Assurance Guidelines for Apprenticeship Programmes has incorporated as much feedback as possible. These quality assurance guidelines will be subject to review.