



Statutory Quality Assurance Guidelines for Apprenticeship

February 2016

Ibec's main business sectors are:

Alcohol Beverage Federation of Ireland

Financial Services Ireland

Food and Drink Industry Ireland

ICT Ireland

Telecommunications and Internet Federation

Irish Medical Devices Association

PharmaChemical Ireland

Retail Ireland

Small Firms Association

Industrial Products.

Submitted by:

Tony Donohoe,

Head of Social and Education Policy

Email: tony.donohoe@ibec.ie

Tel: 0`-6061522

Key points

- Ibec endorses the definition and key defining characteristics of an apprenticeship set out in the White Paper. In particular, it shares the ambition that apprenticeship training should be substantial in depth and duration, and the apprentice should be employed in a real job.
- Ibec shares QQI's assumption that apprenticeship programmes will be restricted to occupations approved by the State for inclusion in the list of apprentice occupations and there will be one programme (nationally) per occupational profile.
- An essential characteristic of the apprenticeship programmes is that they should be 'enterprise-led'. This was a central recommendation in the report from the Review of Apprenticeship Training in Ireland which was subsequently adopted as government policy.
- Ibec is concerned that the structures set out in the White Paper to deliver quality assurance will not support an enterprise-led system. The appointment of a Coordinating Provider with 'ultimate responsibility for the programme' could encourage a drift towards 'supply-driven' schemes.
- The alternative option to establish legal entities which would go through a QQI validation process would be perceived as time-consuming, costly and unnecessarily bureaucratic by existing and potential consortia.
- Ibec accepts the need for a single education and training provider to coordinate the teaching and learning elements of apprenticeship formation and guarantee education standards. However the provider should have this remit as a key member of the Consortia Steering Group which is responsible for overall governance and occupation standards.
- While Skillnets is not directly comparable, it provides a good example of enterprise-led training. QQI should explore the possibility of adapting some of the programme's quality control structures and operating systems for the new apprenticeship model.
- Given the need for ongoing employer involvement in recalibrating apprenticeships to meet business needs, the Consortia Steering Group should retain responsibility for overall governance and the review of occupation standards during the operational phase.
- Ibec agrees with the quality assurance procedures for the training within employment set out in the White Paper. However the detail of these should be developed by the CSG and Coordinating Provider. These procedures should be the delivery mechanism for the national inspection regime.
- QQI support on assessment should be strengthened, particularly in terms of providing generic guidance to CSGs to develop assessment plans for apprenticeships.

Introduction

Ibec welcomes the publication of the White Paper on Statutory Quality Assurance Guidelines for Apprenticeship. In particular, it welcomes the recognition that apprenticeship should create an accessible additional pathway to excellence in education and training achievement, and to help raise Ireland's competitiveness internationally.

Ibec endorses the definition and key defining characteristics of an apprenticeships set out in pages 5-6 of the White Paper. In particular, it shares the ambition that :

'Apprenticeship training should be substantial in depth and duration, and the apprentice should be employed in a real job ...

'Graduates of apprenticeship programmes should be qualified to work autonomously in a competent, professional and independent capacity in their selected field. Apprenticeships should be open to persons of all age groups above the statutory school leaving age. They are a valued mode of learning both for initial entrants to the labour market and for those who wish to continue up skilling. Apprenticeships must prepare the participant for a new job role.'

In order to realise this ambition, it is critical that apprenticeship programmes are appropriately validated for awards at a specified level on the National Framework of Qualification. They should also be subject to periodic review and continual quality assurance.

Ibec shares QQI's assumption that apprenticeship programmes will be restricted to occupations approved by the State for inclusion in the list of apprentice occupations and there will be one programme (nationally) per occupational profile.

Another essential characteristic of the apprenticeship programmes is that they should be 'enterprise-led'. This was a central recommendation in the report from the Review of Apprenticeship Training in Ireland¹ which was subsequently adopted as government policy in January 2014.

The report recommended that:

'Apprenticeships should be enterprise led, with a key role for employers in identifying occupational standards and in shaping the content of the curriculum in collaboration with education and training providers.'

It acknowledged that:

'Employers should be firmly in the driving seat in identifying the scope for new apprenticeships, determining occupational standards, and having a greater role than at present in curriculum design and delivery, in partnership with education and training providers.'

It envisaged that the newly established Apprenticeship Council should, *inter alia*:

'advise on the introduction of apprenticeships in additional occupations promoting an enterprise led approach, supported by evidence of labour market needs and sustainable demand'

Ibec's feedback on the proposed quality assurance guidelines contained in the White Paper is informed by this core principle.

Development stage

The White Paper provides an clear and comprehensive description of the systems and functions that are required to deliver quality apprenticeships. Ibec accepts that these processes are a critical component underpinning the quality of these apprenticeships. However, we are concerned that, as described, the structures set out to deliver these processes will not support an enterprise-led system.

As the OECD has pointed out², there is an inevitable tendency for vocational programmes rooted in education institutions to develop their own dynamic, independent of the world of work and unresponsive to rapid change in the needs of the economy. To ensure that the apprenticeship system is not 'supply-driven', it is critical that employers should be firmly in the driving seat in identifying the scope for new apprenticeships, determining occupational standards, and having a greater role than at present in curriculum design and delivery, in partnership with education and training providers. This was the model adopted by the Review of Apprenticeship Training in Ireland report and endorsed by government policy.

The White Paper ignores this model and asserts that a Coordinating Provider, who is a relevant education and training provider, should be 'ultimately responsible for an apprenticeship programme. Among its responsibilities are the development and maintenance of the curriculum and assessment procedures for the programme and leading the collaborating providers involved.'

The White Paper suggests that Coordinating Provider must be a legal entity and must have the provision of education and training as one of its principal functions. It does suggest that if an entity (e.g. a consortium of different kinds of organisation), is not already a Relevant Provider it may become one through a QQI validation process. For consortia that are currently developing new apprenticeships, this would be time-consuming, an additional cost and unnecessarily bureaucratic. For potential consortia, it would be a significant deterrent to developing new apprenticeships.

QQI's explanation for this approach is that 'the nature and complexity of relationships between the primary partners in apprenticeship formation makes it necessary that a single provider will act as a Coordinating Provider for the proposed programme. The Coordinating Provider will coordinate the activities of employers and collaborating providers among other things. '

Ibec accepts the need for a single education and training provider to coordinate the teaching and learning elements of apprenticeship formation. However the functions outlined for the Coordinating Provider and Programme Board extend well beyond the teaching and learning remit or, indeed, education quality assurance. They include:

- developing binding memoranda of agreement
- managing the programme during operational delivery.
- maintaining a stable brand image for the occupation
- coordinating with employers to ensure that recruitment of apprentices takes into account the knowledge, skill and competence requirements to have a reasonable chance to complete the programme
- establishing a system for market research and analysis including analysis of publications of manpower forecasting bodies.
- estimating demand, including regional analysis
- organising and responding to surveys of apprentices and providing secure feedback mechanisms for apprentices
- assisting in the admission of new members into the consortium
- establishing a system to ensure that the funding agencies and other appropriate state bodies are informed and consulted

² Learning for Jobs. OECD Reviews of Vocational and Education Training. Ireland (2010)

These functions should fall within the remit of the Consortium Steering Groups (CSG) which are the partnerships that originally developed the apprenticeship proposals. The Coordinating Provider is a key member of these consortia, but is ultimately responsible for educational standards – not overall governance or occupation standards.

The difference between occupational standards (or ‘profiles’) was defined by the Apprenticeship Council for the consortia making the apprenticeship proposals. Occupational profiles are classifications and definitions of the main jobs that people do. They are written following the logic of the occupation. They need to be ‘business-led’ where employers in a given sector collaborate, and where necessary, work with professional or trade bodies to create them. Their development should be rooted in the workplace and what people actually need to be able to do and know in their jobs.

Education standards define the knowledge and skills learners should possess at critical points in their learning careers. Therefore, they therefore on what people need to learn, how they will learn it, and how the quality and content of the learning will be assessed.

Ireland already has experience of enterprise-led training through the the Skillnets programme which is based on training needs analysis, business requirements, accredited curricula designed in collaboration with employers and work-based training. Given that the programme’s focus is on shorter upskilling inputs rather than occupation formation, it cannot be compared directly to apprenticeships. However, it should be possible to adapt some of the Skillnets structures and operating systems for the new apprenticeship model.

Operational stage

The White Paper itself makes a strong case for ongoing involvement of employers in apprenticeships.

‘Apprentice programmes pose particular challenges in maintaining quality. They have a strong occupational focus which may require recalibration of outcomes and processes from time to time. This may require occupational scans, strong feedback and input from employers and those involved in the occupation. They are employer led which can lead to changing demand patterns. This might require continual input to ensure that new providers can maintain the quality of the programme.’

However, somewhat surprisingly, it then suggests that there should be no further role for the CSG, once it has identified the Coordinating Provider. Instead it suggests that the ongoing development of the apprenticeship should be assigned to a programme board (albeit with employer ‘representation’ and a programme manager within the education institution.

This structure will fall significantly short of delivering on new model for apprenticeships in which employers would work together with education providers to design standards and assessment plans.

The White Paper suggests that particular attention should be given to development of quality assurance procedures for the training within employment. Ibec agrees. The greater part of the apprentices’ formation will take place with the employer and the role of the employer as trainer is crucial to the excellence of the graduate of an apprenticeship programme.

The White Paper goes on to suggest that Coordinating Provider should develop quality systems that:

- establish a systematic approach to the approval of employers for inclusion in a register of approved employers of apprentices.
- establish that the range of business activity of the employer is such that the apprentice will receive instruction in a sufficient range of skills, knowledge and competences, to satisfy the learning outcomes of the curriculum.
- establish that the employer employs staff who are capable of imparting the training necessary to enable or help learners to achieve the intended programme learning outcomes.

- establish that the employer has a designated mentoring and supportive structure in place with trained staff capable of providing guidance and support to the apprentice throughout his/her training.
- establish that the employer has an apprenticeship management and administrative structure in place capable of linking with and promptly exchanging two-way data with off-the-job providers as necessary for the holistic formation of the apprentice.
- this systematic approach should include review, at appropriate intervals

Ibec agrees that these procedures are necessary and that the Coordinating Provider is well-placed to carry out this function. However, these reviews should be conducted according to parameters agreed by the CSG. To avoid unnecessary duplication, they should also be regarded as the delivery mechanism for the national inspections regime. .

Assessment of apprenticeship achievement

Ibec believes that QQI guidance on assessment could be strengthened, particularly in terms of supporting the development of assessment plans. These should contain an end-point assessment which is a holistic assessment of the knowledge, skills and behavior that have been learnt throughout the apprenticeship. This will be necessary to ensure that apprentices meet the rigorous standard set by employers and are fully competent in the relevant occupation. It will give employers confidence that completing an apprenticeship means an individual is fully job-ready. It will also mean that all apprentices following the same standard are assessed consistently, regardless of where they are undertaking their apprenticeship or with whom they are doing it. The assessment plan should explain what will be assessed, how it will be assessed, who will carry out the assessment and the internal/external quality assurance arrangements to make sure that the assessment is reliable and consistent across different locations, employers and training/assessment organisations.

Supports for apprenticeships and Information Provision

Ibec supports the thrust of the proposals set out in these sections

Conclusion

The OECD and the European Commission have argued that on-going structural change in the Irish economy requires a flexible apprenticeship system where the terms of the apprenticeship depends on the needs of the specific sector. The Review of Apprenticeship Training in Ireland set out a governance framework and operational arrangements which were designed to include real possibilities to create new apprenticeships rapidly, and to react to emerging needs and target resources and participants towards sectors with high potential for growth. It is critical that the quality assurance arrangements support this model.

Ibec Head Office

84/86 Lower Baggot Street
Dublin 2
T: + 353 1 605 1500
E: membership@ibec.ie
W: www.ibec.ie/membership

Galway

Ross House
Victoria Place
Galway
T: + 353 91 561109
E: west@ibec.ie
W: www.ibec.ie/west

Cork

Knockrea House
Douglas Road
Cork
T: + 353 21 4295511
E: cork@ibec.ie
W: www.ibec.ie/cork

Ibec Europe

Avenue de Cortenbergh
89, Box 2
B-1000 Brussels
BELGIUM
T: + 32 (0)2 512.33.33
F: + 32 (0)2 512.13.53
E: europe@ibec.ie
W: www.ibec.ie/europe

Limerick

Gardner House Bank Place
Charlotte Quay Limerick
T: + 353 61 410411
E: midwest@ibec.ie
W: www.ibec.ie/midwest

Donegal

3rd Floor, Pier One Quay Street
Donegal Town Donegal
T: + 353 74 9722474
E: northwest@ibec.ie
W: www.ibec.ie/northwest

Waterford

Business Park Cork Road
Waterford
T: + 353 51 331260
E: southeast@ibec.ie
W: www.ibec.ie/southeast