



NAPD Submission to Public Consultation on the QQI White Paper on the Inaugural Review of Quality Assurance in Education and Training Boards

Introduction

The National Association of Principals and Deputy Principals (NAPD) is the professional association for all Principals and Deputy Principals in Post Primary schools and Further Education and Training (FET) schools and colleges in Ireland. The NAPD-FET committee represents Principals and Deputy Principals from the FET schools and colleges in Ireland under the auspices of the three managerial bodies, ETBI, JMB and ACCS. Established in 2000, this committee has represented NAPD on many national working groups and committees involved in FET. In addition, a representative of this committee is a member of the NAPD National Executive and works with the NAPD Executive in addressing FET issues as they affect Principals and Deputy Principals in their role in leading and managing their schools and colleges.

This submission is based on the collective experiences and knowledge of Principals and Deputy Principals who are involved in delivering many different FET programmes such as:

- Apprenticeships (Pre- and Post-2016)
- PLC Programme
- Traineeships
- SkillsETB
- Momentum
- BTEI
- VTOS
- Adult Education – part-time night provision

NAPD-FET schools and colleges have been catering for a diverse range of learners on the above programmes for many years.

- Direct entry from second level schools
- Direct entry from the senior cycle at special national schools
- Direct entry from Youthreach centres
- Recently unemployed
- Long-term unemployed
- Those up-skilling
- Those retraining
- Those seeking employment
- Part-time Night Students
- Graduates
- International students
- Those who do not thrive in HE and revert to FET
- Mature learners
- Early retirees who are seeking a career change
- Those seeking a change of career

Evolving Policy Landscape

Since 2010, Further Education and Training (FET) in Ireland has undergone enormous change. The first four years of this period focused on putting the building blocks in place for the development of a new sector of the Irish education system. A single Skills Division was created for the first time in the renamed Department of Education and Skills (DES) when it assumed policy responsibility for training. The amalgamation of the VECs and the disbandment of FÁS resulted in the establishment of the Education and Training Boards (ETB). A new national agency to coordinate policy and funding for the FET Sector, SOLAS, was also established. The employment services function of FÁS was transferred to the Department of Social Protection from which the INTREO service emerged. A single national agency for qualifications and quality assurance, Quality and Qualifications Ireland (QQI) was established in 2012. By the end of October 2013, when SOLAS opened

its doors, the institutional triangle of FET - SOLAS, the ETBs, and QQI - was in place. In May 2014, the first ever national FET Strategy was launched in which was presented “a roadmap and implementation plan to realise the vision of a world-class integrated system of further education and training in Ireland” (SOLAS, 2014, p.3). The five years of the first FET Strategy could be characterised as setting the strategic direction and structure for the FET sector in Ireland, and building upon the institutional triangle of FET – SOLAS, QQI, and the ETBs. While the first FET Strategy set out a vision of a world-class FET system, it also important to remember that the current developmental stage of the FET system in Ireland is characterised by historical underinvestment and a significant capacity deficit. Given that between 2012 and 2014, the then Minister for Education and Skills, Ruairí Quinn, referred to the FET system as the “black sheep”, the “backwater”, and the “Cinderella” of the education system”, there is some significant distance to travel.

NAPD is of the view that, while the first strategy set the strategic direction and structure for the FET sector in Ireland, a significant capacity deficit still exists in the FET provision infrastructure. Indeed, the success of macro-policy is significantly dependent on local capacity to deliver.

FET within a Unified Tertiary Sector.

A particular feature of the current policy landscape has been the convergence of FET and Higher Education (HE), at both the policy and institutional levels, which has its foundations in the developments in relation to qualifications and the National Qualifications Framework in the late 1990s and 2000s. In recent times, this convergence has become apparent in the establishment of a single division in the DES for Higher and Further Education and Training Policy, as well as the strategic engagements between the SOLAS, QQI and the ETBs. In 2018, the Department of Education and Skills’ Statement of Strategy (DES, 2018) stated:

“Increase the alignment of higher education and further education and training to achieve a more integrated tertiary education system” (p.14).

This was reiterated in the Action Plan for Education for 2019 (DES, 2019):

“Develop a framework for an integrated strategic approach to tertiary education” (Action 64.1, p.41).

Speaking at the ETBI Conference in 2018, Dr Pádraig Walsh, CEO of QQI, in referring to the obligation of ETBs in relation to Quality Assurance, stated that “the development, compliance and reporting responsibilities of the ETBs are now commensurate with those for higher education” (Walsh, 2018). Indeed, in its recent Statement of Strategy, QQI stated that the ETBs would be subject to an Institutional Review model similar to the CINNTE model that applies to the Institutes of Technology (QQI, 2018). This is in line with the ambition to see ETBs assuming Delegated Authority. Similarly, the Strategic Performance Agreements concluded recently between SOLAS and each ETB, were based on the model used for similar agreements between the Higher Education Authority and the third-level institutions.

While the convergence trend has been identifiable over time, its formalisation in the DES Strategy, as well as the developments in SOLAS and QQI, have brought the issue capacity into sharp focus. Sight must never be lost of the fact that FET within the ETB sector resulted from the amalgamation of former VEC and FÁS provisions. From a governance perspective this has resulted in two governance models for both staff and funding. While discussions are currently on-going on the development of a unified governance model for FET, the status quo remains. Provision in the former VEC sector is located within the post-primary governance model. Historically, staffing resources in the have been based on full-time enrolments. The duties carried out by post-primary teachers in an FET setting are different to those in a mainstream post-primary school. However, whatever a new arrangements may emerge, NAPD is equally aware that many of the wider requirements of the operation of a FET College are not inherently comprehended within the teaching role. Teachers should be doing what they do best – teaching and assessing – and not unnecessarily diverted to other tasks because there is no one else to do them. Indeed, this point was echoed by Dr Pádraig Walsh, CEO of QQI, when he said:

“This [addition governance requirements] shouldn’t have to mean greater diversion of teachers from frontline teaching, as the current burden of

administrative work is already doing this, but a move towards a more balanced mix of administrative and teaching staff across the sector” (Walsh, 2018).

New Validation Policy and Procedures – an illustrative case.

For the purposes of this submission, and by way of illustration. it is worth referring to the recent experience of one member of the NAPD FET Committee of being involved in the new validation process. Three ETBs were recently successful in obtaining validation for three Agriculture Programmes at Level 5 and Level 6 and Special Purpose at Level 6. From a resourcing perspective the Committee Member, who is the Principal of one of the lead FET Colleges, states:

“In order to get these programmes validation ready there were three ETB partners with 18 staff of whom six were external. There were 16 CPD days scheduled to facilitate writing to take place. This created a huge burden on colleges where staff had to be released from their teaching duties to allow this CPD to take place. There were also two mock validation panels, a Programme Steering Group and two stakeholder consultation events held prior to the main validation event”.

This is directly contrary to Dr Walsh’s view of what should be the case, referred to above. In short, teachers had to be released from teaching duties, thereby undermining the quality of the programmes they were teaching on, to engage in a quality assurance process. Perhaps a bit ironic? In making the observation above, the Principal concerned did not refer to the significant time commitment they also had to make to the process.

NAPD Response to the White Paper

NAPD welcomes the opportunity to contribute to the discussions in relation to the QA Review of ETBs. While this submission will present the NAPD response to the White Paper on Inaugural Quality Assurance Reviews in the ETBs, NAPD also represents the interests of Principals and Deputy Principals with FET provision in their schools

outside of the ETB Sector in Ireland. When appropriate NAPD would welcome an opportunity to discuss any proposals for QA Review arrangements for these providers.

While individual observation are outlined below, the over-riding concern for NAPD is the issue of a significant lack of resources, both financial and staff. It is accepted that ETBs have established QA and Development Offices. However, the scale of these modest increases in resources is insufficient to meet the demands of the new governance requirements of QQI and other agencies. Indeed, it is NAPD's position that the absence of such resources constitutes a significant corporate risk to, not only to each FET College, but also to the ETBs.

Purpose

NAPD welcomes the acknowledgement of current organisational context as well as the diversity between ETBs. The incorporation of both an individual and cross-sectoral perspective to the review of QA is also welcome. NAPD envisions the recommendations of the sectoral review in "identifying systemic observations and findings" (p. 12), as contributing to the business case for additional resources to deal with the under-resourcing issue.

NAPD also welcomes the inclusion of international experts on the Review Panels. Any quality framework needs to have an input or link to international and/or EU best practice. The recent publication of the EU Commission in relation to Social Priorities under the Juncker Commission, 9th April 2019 makes reference to an enhanced educational landscape for FET which includes the development of the new skills agenda and ErasmusPro. ETB QA should be robust to respond to EU QA needs and requirements in order to maintain the integrity of the Irish QA system.

Effectiveness

This section outlines how the QA review processes will be robust, evidenced-based and demonstrably fit for purpose. As mentioned above, administration and academic management levels in a FET context are considerable less than those in a HE

context. In order to have evidence-based QA systems consideration should be given by QQI as to what is actually achievable given the current lack of properly trained staff within the ETB sector.

NAPD would welcome further clarification on the range of data to be included in this review. While stating in section 2.1.2 that the review processes will be “robust, evidenced-based and demonstrably fit for purpose”, later references in the White Paper seem to introduce a lack of clarity. In discussing the ways in which the different purposes of the review will be “achieved and measured” (p.8), item 5 refers to the encouragement of quality “by using evidence-based, objective methods and advice”. By comparison, in discussing the scope of the QA review, it states the “the scope of the reviews will be primarily qualitative” (p.10).

The emerging data structure for FET in Ireland is still is a nascent, and indeed, evolving stage of development. New data fields are being added, and existing fields altered, on an on-going basis. Given the temporal dimension to data capture and analysis, both quantitative and qualitative, clarity of the data required for the QA Review would be important at the earliest possible stage in the process.

Policy – Principles – Inclusivity

NAPD welcomes the acknowledgement of the “breadth, diversity and multi-layered nature of ETB provision”. In identifying the relevant stakeholders to involve in the process, it is important to remember the “community-based ethos of further education and training” (SOLAS, 2019, p.1). NAPD is of the view that consulting each ETB on the range of its relevant stakeholders in advance on the review would be a valuable exercise.

Scope of the Review

In the case of apprenticeships, the role of the collaborating and the co-ordinating provider has caused a great deal of confusion and additional work within ETB’s. In addition to delivering their own existing QA, ETBs delivering craft-based

apprenticeships are also engaged with a SOLAS-led QA system. It is resource intensive, confusing and risk heavy.

Conclusion

This submission represents the current thinking of the NAPD-FET Committee in what is an on-going debate in which we are pleased to participate. Members of NAPD-FET continue to be available for discussions and to contribute constructively to the continued development of QA governance within the FET Sector in Ireland.

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