



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Inaugural Review of Quality Assurance in Education and Training Boards

Consultation Feedback Report

September 2019

www.QQI.ie

1. INTRODUCTION

- 1.1 Following the approval by QQI of the quality assurance procedures of the sixteen Education and Training Boards (ETBs) in 2018, the implementation and effectiveness of those procedures are subject to cyclical review. An external review of quality assurance has not previously been undertaken for the ETBs, neither through QQI nor former legacy awarding body processes. QQI issued a White Paper¹ for public consultation outlining its intended approach to the inaugural review of quality assurance in the ETBs to elicit feedback from interested stakeholders.
- 1.2 It is intended that the White Paper will inform the development of a Policy for the Inaugural Review of Quality Assurance in the ETBs and related procedures. The White Paper was subject to consultation from 15 April – 28 June 2019 and outlined the:
- principles under which the Policy (and any related procedures) will be developed;
 - purposes of the review;
 - proposed methodology; and
 - outcomes of the reviews.
- 1.3 This report sets out a summary of the feedback received and outlines the next steps in the development of the process.

2. CONSULTATION RESPONSES

- 2.1 Six written responses were received to the consultation from stakeholders, the source of which can be broadly categorised as follows:

Organisation Type	No. of Responses
ETB	2
Representative Organisation	3
Trade Union	1

- 2.2 The list of organisations that contributed to the consultation is included in the Appendix. As outlined in the QQI Consultation Framework², all submissions received through the formal public consultation processes have been published on the QQI website (unless otherwise requested). QQI would like to thank all of those who contributed to the consultation process for their insights and suggestions. Stakeholder feedback is a crucial element in the design of effective policy and procedures. The comments provided through this process will inform and enhance the ongoing development of QQI's approach to the inaugural reviews.

¹ <https://www.qqi.ie/Publications/Pages/White-Paper-Inaugural-Review-of-Quality-Assurance-in-Education-and-Training-Boards.aspx>

² https://www.qqi.ie/Publications/Publications/QQI_Consultation_Framework.pdf

3. FEEDBACK

3.1 OVERVIEW

- 3.1.1 Responses to the White Paper were largely positive with broad support for the inaugural reviews. A number of respondents commented on a perceived lack of detail in respect of some of the proposals. One submission, for example, whilst welcoming QQI's non-prescriptive approach to the White Paper to allow flexibility, recommended that detailed guidelines should be developed to support ETBs in fulfilling their obligations under the review process, and to enable them to engage with it in an effective manner. Another considered that as the White Paper does not prescribe detailed measures for the conduct of reviews, "this gives each ETB the autonomy to create bespoke procedures specific to its FET provision".

QQI Response

As a White Paper, the proposals contained in the consultation document are necessarily high-level. However, more detailed arrangements on the conduct of the reviews will be developed in consultation with stakeholders over the coming months to support the process. Whilst QQI wishes to ensure sufficient flexibility to enable individual ETBs to articulate and evaluate their own quality assurance systems in a manner appropriate to their particular contexts, we are also cognisant that this is the first such exercise of this nature within the sector and that the ETBs would welcome guidance from QQI to ensure maximum utility and benefit from the process. QQI's Policy for the inaugural reviews will therefore be supported by the publication of a more detailed guide to the process, including information on the conduct and content of the self-evaluation process; logistical information on each phase of the review; roles and responsibilities; and an implementation schedule and timelines.

3.2 ETB CONTEXT

- 3.2.1 Respondents welcomed the recognition of the context for the reviews, particularly the evolving and developmental nature of quality assurance (QA) within the ETB sector as it continues to integrate legacy processes. It was suggested that the discussion of the process within the sector has further strengthened the ETBs' understanding of their QA obligations as providers of education and training and that they are actively supporting professional development initiatives to effectively fulfil those responsibilities and prepare for external review. However, the historical context of the ETBs (arising from the amalgamation of former VEC organisations and FÁS provision) was emphasised and it was suggested that whilst the sector is working towards a unified model of QA governance, the legacy systems inherited by the ETBs still pertain.
- 3.2.2 Two submissions commented on resource constraints within the sector that need to be borne in mind as part of the context for the review. One stated that "... the current developmental stage of the FET system in Ireland is characterised by historical underinvestment and a significant capacity deficit". Another advocated that the inaugural review should have regard to "... funding, staffing, management and other resource constraints insofar as such deficits detract from optimal Quality Assurance processes and require, by definition, that specific processes are tailored to available resources".

- 3.2.3 It was also suggested that despite having development, compliance and reporting responsibilities commensurate with higher education institutions, current ETB staffing structures often result in additional responsibilities falling to teaching staff. Whilst it was acknowledged that ETBs have established QA and Development Offices, it was considered that the scale of these modest increases is insufficient to meet the demands of the new governance requirements of QQI and other agencies and represents a corporate risk. An example was cited in relation to recent programme development activity that required teachers to be released from teaching duties to attend professional development to facilitate the writing of new programmes. The response pointed to an irony that the quality of the programmes they were teaching on were being undermined so that they could engage in a quality assurance process. The submission recommended that consideration be given by QQI to what is achievable in terms of QA systems in light of this resource context.
- 3.2.4 Two respondents also commented on the heterogeneity of ETBs and welcomed the flexible nature of the review model in this context. One further suggested that the differences in the size, scope, demographics, provision, employment opportunities etc. among ETBs make comparisons across the sector unreliable and that references in the White Paper to ‘comparability’ are therefore unwelcome.

QQI Response

As outlined in the White Paper, QQI is cognisant of the ETBs’ historical and current organisational contexts and that the development of integrated quality assurance systems and procedures within the sector is still a work in progress. Whilst QQI would encourage ETBs to continue to progress this work as far as possible in advance of the inaugural review, review teams will be fully briefed on this context by QQI as part of the training and preparation for review. In addition, where an ETB considers that this context impacts on its current quality assurance system, it will have an opportunity to articulate that as part of its self-evaluation. Furthermore, it is recognised that there may be structural and systemic issues within the sector impacting on the development of quality assurance and QQI considers that the proposed sectoral report will provide an opportunity for these to be identified and explored.

QQI acknowledges that references to the process ‘enabling comparison’ across ETBs are potentially problematic. The reviews are intended to have a primarily constructive orientation and the reference to comparability was intended to encompass both national and international reference points and as a means of identifying good practice. However, the potential for misinterpretation is acknowledged and QQI will avoid this language in finalising the Policy.

3.3 SCOPE

- 3.3.1 The White Paper outlined that part of the scope of the review will be to “evaluate the effectiveness of an ETB’s quality assurance procedures for the purposes of establishing, ascertaining, maintaining and improving the quality of further education, training, and related services”. One submission suggested that the reference to improving the quality of further education and training should “aim towards the establishment of a single coherent Quality Assurance Procedure governing FET in all ETBs”. It also advocated that the governance structures, support structures and resources currently provided by ETBs in respect of their QA procedures should be included as a focal point of the process.

- 3.3.2 Another respondent, noting that the reviews will evaluate the effectiveness of an ETB's QA procedures, recommended that the reports should provide insights into the drivers of good practice in QA among ETBs.
- 3.3.3 In seeking to clarify the scope of the review, the White Paper emphasised the comprehensive nature of the review as pertaining to an ETB's quality assurance arrangements in respect of all relevant provision. Acknowledging the multiple parties involved in FET delivery, the White Paper stated that whilst the review "will evaluate the operation of the ETB's quality assurance arrangements in respect of the ETB education and training provision in scope, those parties will not themselves be subject to review as individual entities". One respondent highlighted a concern in relation to the "inclusion of contracted training providers and employers in the assessment of ETB quality assurance processes, without a similar assessment of employer and contracted training provision and educational provision taking place". It was suggested that employers and contracted providers are playing an increasing role in ETB provision, that learners have found work placements and learning delivered by contracted providers to be "more mixed" and that this should therefore be reviewed in the same way as provision delivered directly by the ETB.
- 3.3.4 The complexity of QA arrangements for the delivery of apprenticeship were also noted, with one organisation stating that the delivery of these programmes is "resource-intensive, confusing and risk-heavy".
- 3.3.4 The White Paper highlights that the scope of the inaugural reviews will differ from subsequent cycles of ETB reviews and that the outcome of the initial reviews will inform the scope of any future thematic reviews. Clarity was sought from one submission on how QQI will decide the themes it will adopt for any given review cycle.

QQI Response

Although QQI is intending to undertake the inaugural reviews as an omnibus review, it is important to emphasise that it will still comprise sixteen separate reviews of the ETBs as individual providers of education and training. The establishment of a consistent and coherent model of quality assurance within each ETB is an expectation of QQI's Core and Sector-Specific Quality Assurance Guidelines³ and whilst ETBs may find it preferable to adopt similar approaches, ultimately it is for each ETB to design and develop a quality assurance system that reflects, and is appropriate to, its own unique structure and operating context (see 3.2.4). The governance and support infrastructures underpinning that system will form part of the focus of the review. Reviews will reflect on resources insofar as they support the sustainability of the teaching and learning environment and underpinning quality assurance system, e.g. that the ETB's quality assurance system is appropriately staffed to enable the approved procedures to be implemented.

Whilst it is recognised that there are complex delivery structures within the sector and a high degree of collaboration, each ETB is nonetheless responsible for the quality assurance of all provision delivered to its learners – including where external or third parties are involved in the delivery of that provision. Thus, whilst a contracted training provider, for example, will not in itself be subject to review, reviewers will evaluate the arrangements the ETB has in place to quality assure the provision of any education and training delivered to ETB learners in that setting in the same way as they will evaluate the effectiveness of the quality assurance arrangements for other forms of ETB provision. Similarly, where ETB learners are in work-based learning environments, the ETB's arrangements for assuring the quality of their experience will form part of the focus of review. QQI would expect that these elements of ETB provision and scope of QA would form an explicit part of an ETB's self-evaluation.

³ <https://www.qqi.ie/Downloads/Core%20Statutory%20Quality%20Assurance%20Guidelines.pdf>
<https://www.qqi.ie/Publications/Publications/Sector%20specific%20QA%20Guidelines%20for%20ETBs.pdf>

Feedback from learners should form a fundamental part of any provider's quality assurance system and where learners have identified issues with a contracted provider or placement, this should be identified and addressed by the ETB's QA system. The interaction between reviewers and learners as part of the site visit provides an opportunity for the implementation and effectiveness of the ETB's mechanisms in this regard to be explored from an external perspective.

Where an ETB identifies matters that impact on the effectiveness of its quality assurance arrangements but which it considers are outside of its control a review team would expect to see this reflected in the organisation's self-evaluation and it would be explored further during the course of the review. Where such difficulties are identified as a product of sectoral or structural issues, the sectoral report will provide a vehicle for these to be identified and explored further. Similarly, strategic findings such as 'drivers' of good practice within the sector could be surfaced in this report.

Whilst QQI does not have any immediate plans to conduct a thematic review within the sector, the focus of any such reviews is likely to be influenced by issues potentially identified in the sectoral report; issues identified by QQI arising from regular monitoring from ETBs; by a particular incident or risk; or an area of interest/concern to the sector.

3.5 MODEL

- 3.5.1 One submission highlighted that the multidimensional nature of quality requires a multidimensional approach in considering the effectiveness of QA. It suggested that the self-evaluation report is a key anchor point in this, providing the review team with an overview of what has been achieved and the lessons learned. The importance of guidelines to support the self-evaluation process was also highlighted, particularly in relation to the content and length of the reports and to ensure that they are analytical in focus. Clarification was sought on whether ETBs will have an opportunity to enhance their quality assurance procedures following completion of the self-evaluation report but prior to the appointment of the review team.
- 3.5.2 The intention to achieve a broad involvement of stakeholders in the review process was welcomed, both in terms of the self-evaluation process and other aspects of the process. The "community-based ethos of further education and training" was emphasised and the importance of capturing learner, employer, staff and management perceptions of quality within FET provision. In the context of ETBs as co-ordinating providers of apprenticeship, it was suggested that the review process should also provide insight into perceptions of quality in employer-based training. One submission recommended that QQI consult with each ETB on the range of its relevant stakeholders in advance of the review.
- 3.5.3 It was suggested that the White Paper lacked clarity on the use of data within the reviews, citing a potential inconsistency between the intention to adopt "evidence-based, objective methods" for review with the scope of the review being "primarily qualitative". The data structure for FET in Ireland was described as being in a "nascent, and indeed, evolving stage of development" and it was considered important to have clarity on the data required for the review as early as possible.
- 3.5.5 One organisation sought reassurance that any review team comments on "'significant areas of concern' which have subsequently been addressed appropriately by an ETB, will be removed once QQI is satisfied". The respondent was concerned that any such comments, subsequently addressed, would remain in the public domain until the next review cycle.

3.5.7 The evaluation of the review process provided for in the White Paper on completion of the reviews was welcomed.

QQI Response

Respondents have rightly recognised the critical importance of the ETB's self-evaluation to the review process. The self-evaluation report will need to clearly outline the ETB's quality assurance system and evidence its evaluation of the implementation and effectiveness of that system. It will demonstrate to the review team the ETB's capacity to engage in open dialogue, self-reflection and critical evaluation.

Whilst the ETBs undertook an executive self-evaluation process as part of their re-engagement with QQI, the self-evaluation required as part of the inaugural review is expected to be more comprehensive and self-evaluative/reflective. It is important that the ETBs are able to articulate and evaluate their quality assurance systems in a manner that is appropriate to their context. As this is the first review of this nature in the sector, QQI will provide guidance on the content of the self-evaluation. However, it is expected that ETBs would take ownership and leadership of the process and reflect on approaches and methodologies for self-evaluation that are appropriate to their operating environment and stakeholder base. The timeline for the reviews will include an opportunity for the ETBs to plan their approach to self-evaluation.

Whilst ETBs will be free to address any issues identified in the self-evaluation at any stage, the original self-evaluation report (in conjunction with the Terms of Reference, with which it should align), will nonetheless inform and shape the ETB's dialogue with the review team and the structure of the site visit. The timeframe between the submission of the self-evaluation and the site visit will be fairly limited but where issues identified within the evaluation report have been addressed in advance of the review visit, this will be reflected in the findings of the review report. However, the review report submitted to QQI will reflect the findings of the review team at the time of the site visit. Other than provision for amendments relating to factual accuracy, it will not be possible to make any substantive changes to the report where areas of concern have subsequently been addressed by the ETB.

QQI recognises the diversity of ETB stakeholders and it is certainly anticipated that ETBs will identify these as part of the planning for the review with a view to ensuring their availability for the site visit.

With regard to the use of data in reviews, it is important to clarify that the organisations will not be evaluated on performance against key data indicators. They will, however, be evaluated against QQI's Quality Assurance Guidelines, which outline an expectation that a provider's self-monitoring and evaluation processes include the development of indicators and collection of data to measure the effectiveness of quality assurance policies and procedures. Reviewers will therefore be interested in how an ETB uses data as part of its quality assurance system and to evidence the conclusions within its self-evaluation.

Beyond the provision of basic data on the profile of the organisation, it will be a matter for each ETB to identify the data it will use to evidence its QA system. In addition, whilst the reviews will have a primarily qualitative focus, QQI expects that the findings of both the ETB in its self-evaluation, and of the review team in its report, will be evidence-based. In most cases, this will not solely rely on data reports but will include the existence of policies and procedures, the documentation of processes and decision-making and the testimony of staff, learners and stakeholders.

3.6 SECTORAL REPORT

- 3.6.1 The intention to include a cross-sectoral perspective to the review was welcomed and it was suggested that the sectoral report could contribute to the business case for additional resources within the sector to deal with under-resourcing. One respondent noted that the White Paper includes limited detail on the proposed sectoral report and suggested that clarification is required in relation to the impetus for this report, its target audience, the involvement of stakeholders and the composition of the report.
- 3.6.2 Two submissions commented on the capacity for the reviews to highlight and disseminate examples of good practice within the sector, either with a view to enhancing existing practice or in adopting a consistency of approach to QA.

QQI Response

QQI considers that the sectoral report will be a valuable output of the review process, identifying collective findings on the basis of empirical evidence across the sixteen reviews from an independent and external perspective. It will also provide an opportunity to showcase best practice and identify cross-sectoral issues and opportunities. In order to achieve this to best effect, QQI will establish clear Terms of Reference for the report in consultation with stakeholders and informed by the feedback provided through the consultation.

3.7 REVIEW TEAMS

- 3.7.1 All of the responses made reference to the composition of the review teams. It was suggested this will require careful consideration to ensure both consistency and a richness of review approaches across ETBs. One submission recommended that review teams should include QQI staff members to support this consistency of approach.
- 3.7.2 Respondents considered it important that review teams include representatives with a breadth and depth of understanding of FET within the ETB sector and that are reflective of the sector's stakeholder base. One submission highlighted that whilst the White Paper proposed (entirely appropriately) the inclusion of learner representatives within the review teams, staff representatives were omitted. The organisation requested that it be invited to nominate staff representatives to participate on each review team.
- 3.7.3 The inclusion of international experts on the review teams was also welcomed. It was noted that in the context of European policy and funding developments (e.g. Erasmus Pro), it is important that ETB QA is linked to international best practice and is sufficiently robust to respond to EU QA needs.
- 3.7.3 Clarification was sought on whether the profile of a review team will:
- reflect the profile of the ETB being reviewed; and
 - include ETB FET staff.

LEARNER VOICE AND REPRESENTATION

- 3.7.4 The intended inclusion of learner representatives in the review teams was welcomed with one respondent highlighting the authentic involvement of learners – “particularly those whose voices are least heard” - as being essential for supporting access, retention and engagement. It was suggested that the role of learner representatives within review teams is not clearly defined within the White Paper and that QQI should articulate a clear outline of what ‘learner representative’ means (e.g. does it apply only to enrolled learners or could former learners also participate?). It was identified that the short-term nature of many FET programmes needs to be considered in this regard.
- 3.7.5 The following observations were also highlighted:
- QQI should consider what is meant by diversity – not just the diverse types of ETB provision but a broader conceptualisation that includes individuals from marginalised communities (e.g. Travellers, refugees, older learners or groups identified as having low rates of participation in education).
 - The White Paper states that review teams will have an appropriate gender mix. Clarification was sought on the meaning of diversity in this context,
 - It was also emphasised that gender should not be the only aspect of diversity that should be considered in the composition of review teams.
- 3.7.6 In order to ensure the meaningful involvement of FET learners in review teams, it was suggested that QQI must commit to supporting learner representatives on review teams and that a sustainable model should be developed for this to avoid a tokenistic approach. In addition, it was considered that all members of a review team should be equipped with the skills “to deconstruct some of the power dynamics that could occur”.

COMMUNITY EDUCATION PROVIDERS

- 3.7.7 Given the history of collaboration between community education providers and ETBs (and their predecessor organisations), it was suggested that the former should be represented on review teams to broaden the expertise of the teams with regard to this aspect of ETB provision.

QQI Response

As outlined in the White Paper, QQI intends that the review teams will comprise representatives from the ETB and/or wider training sector (which could include ETB staff); international representatives; learner representatives; and industry/employer/other external stakeholder representatives. QQI will seek to ensure consistency of approach through the use of common terms of reference and training for review teams: however, given the novelty of the process in this sector, further consideration will also be given to the involvement of QQI staff with review panels in this regard.

The composition of each team will be determined by QQI in accordance with the profile of the ETB under review. In order to ensure the independence and appropriate expertise of the review team, no external party will have a right to nominate any review team member.

Whilst QQI will seek to achieve a broad range of expertise, it will not be possible to represent every stakeholder on every review team.

The externality, independence and objectivity of review team members is also a key consideration. We will seek to ensure that the detailed guidance on review and review planning strives to achieve broad representation across the stakeholders consulted by the ETB in preparing its self-evaluation and met by the review teams at each ETB. The process for the development of the sectoral report will also include an opportunity for input from stakeholder groups.

QQI is committed to the meaningful involvement of learners in the review process and recognises that the unique and diverse learner cohort within the ETB sector will necessitate careful consideration of the recruitment, training and support needs of learners within review teams; review team dynamics; and mechanisms for the involvement of learners who are meeting with reviewers as part of site visits. The issues raised in the consultation will inform the detailed guide for review and will form a key strand of QQI's implementation planning.

3.8 TERMS OF REFERENCE

- 3.8.1 The inclusion of learner voice as part of the evaluation criteria was welcomed. It was suggested that further detail is required to understand how this will be evaluated and that clarity should be provided before the process commences.
- 3.8.2 In the context of references to the mission and strategy of an ETB, clarification was also sought as to whether QQI intends to “examine the suitability of an ETB’s mission statement”.

QQI Response

As outlined in the White Paper, QQI will refine the draft Terms of Reference for the individual ETB reviews in the coming months in consultation with stakeholders.

The mission of an ETB will be considered within the review insofar as review teams will wish to explore whether/how the provider’s quality assurance system is aligned to its mission and supports its delivery and whether the learner experience is in keeping with that mission.

3.9 IMPLEMENTATION

- 3.9.1 As this will be the first review of its type within the sector, one submission suggested that ETBs will need time to develop and implement appropriate procedures and that any implementation plan would need to reflect this. It also recommended that the reviews are conducted in a slightly staggered manner, whereby some ETBs would complete the various elements of the review process in advance of others, thereby enabling learning and strengthening the process across the sector.
- 3.9.2 Clarification was sought on:
- the timeline for both the consultative process and the review process, given that ETBs are still currently utilising legacy quality assurance procedures; and
 - whether a review team will visit single or multiple ETBs with similar profiles.

QQI Response

QQI will develop an implementation plan for the inaugural reviews in consultation with the sector. The implementation plan will include a phase for ETBs to plan for the self-evaluation process.

The primary aim of undertaking the inaugural reviews as an omnibus is that the initial review of the organisations occurs at a similar point in their development. However, there is scope for some degree of staggering within the process. QQI will work with the sector to develop a detailed schedule for the reviews as part of implementation planning. This will include consideration of the number and profile of ETBs to be reviewed by individual review teams.

Whilst ETBs have begun to develop integrated quality assurance procedures, it is recognised that this is an ongoing process which may not be concluded at the time of the review and that some legacy processes may still be in operation. Although QQI has encouraged ETBs to continue to progress this activity as far as possible, any review of this nature is of a provider at a point in time. An effective and responsive quality assurance system is dynamic and evolving in any event. Review teams will be fully briefed on the particular context of the ETBs and will evaluate the quality assurance arrangements that are in place within that context with a view to informing the ongoing development and evolution of those quality assurance systems.

4 NEXT STEPS

- 4.1 QQI will finalise its Policy for the Inaugural Review of Quality Assurance in Education and Training Boards in September 2019, taking on board the feedback provided in the consultation on the White Paper.
- 4.2 QQI will also work with stakeholders to finalise:
- Terms of Reference for the individual reviews and the sectoral report;
 - a schedule and implementation plan for the reviews; and
 - a detailed guide to ensure clarity for all stakeholders and support ETBs undergoing the review process.

APPENDIX

List of Respondents

- AONTAS
- Education and Training Boards Ireland (ETBI)
- Kerry Education and Training Board
- Mayo, Sligo & Leitrim Education & Training Board
- National Association of Principals and Deputy Principals
- Teacher's Union of Ireland



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