

# Validation panel report on the application by SOLAS for validation of five apprenticeship programmes leading to Advanced Certificate Craft Awards:

- Carpentry and Joinery
- Electrical
- Heavy Vehicle Mechanics
- Metal Fabrication
- Plumbing

## Synopsis

The Irish apprenticeship system is admired nationally and internationally. For these five apprenticeships the four year timeframe allows apprentices to mature. The alternating programme is structured in a way that enables it to meet the needs of small, medium and large companies. SOLAS's and its partners' commitment to apprentices and apprenticeship is evident. The record of Irish apprentices' success in the World Skills Competition attests.

The proposed (version 3) new curricula are intended to enhance the five apprenticeship programmes. There is much to commend in the proposed updates to these programmes. Nevertheless, there are matters that require attention. These are outlined in this report.

The validation panel recommends to QQI that it validate the five updated apprenticeship programmes subject to conditions specified in this report. Timescales for the achievement of the conditions are specified. The validation panel recommends that the new curricula can be introduced immediately.

## 1 Introduction

SOLAS (An tSeirbhís Oideachais Leanúnaigh agus Scileanna) applied to QQI for validation of five apprenticeship programmes on 29 May 2015 (revised documentation was received on 13 August 2015).

SOLAS's apprenticeship programmes are intended to provide formation to apprentices that is

- high-quality,
- demand-driven, and
- employment-focused.

They aim to enable apprentices to acquire knowledge, skills and competence that

- meet labour market needs;
- provide a foundation for them to respond to technical evolution; and
- prepare them to progress in education and training.

SOLAS is advised on the development of the established apprenticeship system in Ireland by the National Apprenticeship Advisory Committee (NAAC). In this report 'established apprenticeship' means an apprenticeship that is established under the Industrial Training Act 1967. The NAAC includes social partners and other stakeholders.

SOLAS (and previously FÁS) developed the established apprenticeship programmes in partnership with employers, trades unions, the Department of Education and Skills and the Institutes of Technology (public higher education institutions).

The current model for apprenticeship (involving alternating on/off-the-job phases) was developed in the early 1990s (version 1). Prompted by the NAAC the curriculum was reviewed in 2003 (version 2). The NAAC initiated a third review cycle in 2012 (version 3). It is the version 3 curriculum that is being considered as part of this programme validation process. Following validation SOLAS intends that new registrants will follow the version 3 curriculum. Apprentices who have already started the existing (version 2) curriculum will continue with it.

### 1.1 Legislation concerning the apprenticeship programmes

These apprenticeship programmes and SOLAS are subject to legislation including the Industrial Training Act 1967 and the Qualifications and Quality Assurance (Education and Training) Act 2012 (i.e. the Act of 2012).

## 2 Background and changing contexts

It is relevant that in parallel with the apprenticeship curriculum review there have been wide-ranging changes in the further education and training sector, its regulation, governance and organisation. The implications of these changes are still being worked through across the further education and training sector.

### 2.1 Establishment of SOLAS

SOLAS (An tSeirbhís Oideachais Leanúnaigh agus Scileanna) was formally established on 27 October 2013. It is a statutory body that operates under the aegis of the Department of Education and Skills. It has inherited the responsibility under the Industrial Training Act 1967 for apprenticeships for designated industrial activities (currently there are 27 including the 5 being considered here). Previously FÁS (An Foras Áiseanna Saothair), the former statutory Irish training and employment authority, had this responsibility. FÁS was dissolved with the establishment of SOLAS.

### 2.2 Establishment of the ETBs

The former FÁS Training Centres which had been heavily involved in the provision of education and training to apprentices and the Service to Business Units responsible for the registration of apprentices and approval and monitoring of employers have all transferred to the Education and Training Boards. Education and Training Boards (ETBs) are statutory education authorities which have responsibility for education and training, youth work and a range of other statutory functions. ETBs manage and operate second-level schools, further education colleges, pilot community national schools and a range of adult and further education centres delivering education and training programmes.

The ETBs were established on 1 July 2013, when the 33 Vocational Education Committees (VECs) were dissolved and replaced by 16 ETBs. The ETBs are established under, and governed according

to, the Education and Training Boards Act 2013. Each ETB is a statutory body with its own corporate status.

### 2.3 The first further education and training strategy

One of SOLAS's first tasks was to develop (for government) the first ever strategy for the Further Education and Training (FET) sector. The strategy was launched by the Minister for Education and Skills and the Minister of State for Training and Skills in May 2014.

### 2.4 (Strategic) review of apprenticeship

The Department of Education and Skills commissioned a Review of Apprenticeship (this was independent of SOLAS's curriculum review mentioned earlier) and the report was published in December 2013. This review report was considered during SOLAS's review of the apprenticeship curricula.

Incidentally, QQI and SOLAS are also represented along with others on the Apprenticeship Council, which was launched on 18 November 2014 on an interim basis. The Apprenticeship Council is tasked with the expansion of apprenticeship across a range of qualification levels into new sectors of the economy. Currently, the Apprenticeship Council has no role in respect of the established apprenticeships.

### 2.5 Establishment of QQI

Quality and Qualifications Ireland (QQI) is also a relatively new organisation. It was established in 2012. It is a state agency established by the Quality Assurance and Qualifications (Education and Training) Act 2012 with a board appointed by the Minister for Education and Skills. Its functions include those previously carried out by the Further Education and Training Awards Council (FETAC); the Higher Education and Training Awards Council (HETAC); the Irish Universities Quality Board (IUQB) and the National Qualifications Authority of Ireland (NQAI).

### 2.6 Economic and social turbulence

The 2010 banking crisis and collapse of the Irish construction industry was catastrophic for many apprentices and their employers. FÁS and then SOLAS had central roles in assisting redundant apprentices to complete apprenticeships. Fortunately, there is now an increasing demand for apprentices again.

The consequential pressures on public finances has impacted on human resources in the further education and training sector (e.g. staff not being replaced).

## 3 What is programme validation?

A validation exercise is an external quality assurance process that provides an opportunity for an objective view on whether or not a QQI award can be offered in respect of a given programme. Associated outcomes include the endorsement of good practice and the identification of opportunities for improvement.

Technically, a programme of education and training is validated where QQI confirms under section 45 of the Qualifications and Quality Assurance Act 2012 (the Act of 2012), that the provider of the programme has satisfied it that an enrolled learner of that provider who completes that programme will acquire, and where appropriate, be able to demonstrate, the necessary knowledge, skill or competence to justify a QQI award being offered in respect of that programme.

Only a provider of an education and training programme may apply for validation of a programme of education and training. The Act of 2012 states that a provider shall not make an application under subsection (5) unless (among other things) the provider has established procedures for quality assurance (QA) under section 28 of the Act of 2012.

FÁS had agreed QA procedures with the Further Education and Training Awards Council and those procedures continue in force for SOLAS (under section 84 of the Act of 2012) as if they had been established under section 28 of the Act of 2012.

### 3.1 Collaborative provision

In the context of the Act of 2012, the established apprenticeship programmes are collaborative programmes. The collaborators are:

- SOLAS (the lead provider of apprenticeship programmes of education and training and the agency responsible for the administration of the apprenticeship)
- Education and Training Boards (ETBs are education and training providers)
- Institutes of Technology (IOTs are education and training providers)
- SOLAS approved employers (training providers)

QQI is responsible for approving and reviewing the effectiveness of quality assurance procedures established by SOLAS as a 'relevant provider' of programmes of education and training. It has a similar role in respect of the ETBs and the IOTs. With certain exceptions, QQI has formal responsibility for making educational and training awards in respect of programmes provided by SOLAS, the ETBs and the IOTs other than DIT. It may also delegate awarding authority to these organisations. With certain exceptions, except where it has delegated authority to make awards, it is responsible for validating these bodies' programmes of education and training. QQI is also responsible for the National Framework of Qualifications and for determining standards for its awards and those made under delegated authority.

SOLAS has extensive responsibilities for interfacing with employers under the Act of 1967. It is noteworthy that QQI has no direct involvement with the employers who train apprentices unless via other unconnected channels.

## 4 SOLAS's application for validation

The documents supporting the application for validation by SOLAS were received by QQI on 29 May 2015. Following an initial screening of the applications, QQI requested further information from SOLAS (for example, see Appendix 3). SOLAS sent a revised submission to QQI on 12 August 2015. Whilst there was still some concern regarding the submission the QQI executive decided to proceed because these apprenticeships are up-and-running and delaying the introduction of refreshed curricula for the apprenticeships in question was considered undesirable. The executive was also conscious that the validation process under the 2012 Act enables it to apply conditions regarding, for instance, amendments to a proposed programme or the provider's quality assurance procedures, should the validation process deem these to be necessary.

It is noteworthy that while apprenticeships have been running for many years this is the first time they have been submitted for formal validation by QQI or its predecessors.

### 4.1 QQI's validation policy and criteria

QQI is conducting this validation process in accordance with "Policy and Criteria for the Validation of Further Education and Training Programmes Leading to QQI CAS Awards" (Revised October 2013). The validation criteria are

- consistency with the award being sought i.e. the structure of the proposed programme should meet the award requirements at the relevant level within the [national] framework of qualifications [NFQ]. There should also be consistency between the programme and the provider's quality assurance policies and procedures
- coherence in respect of its stated objectives, content, learner profile and assessment activities
- capacity of the provider to deliver the programme to the proposed level
- compliance with the Qualifications and Quality Assurance (Education and Training) Act 2012 in relation to access, transfer and progression and protection for learners as appropriate and compliance with any special conditions attached to the award specification e.g. legislation, specialist resources etc.
- the programme's potential to enable the learner to meet the standards of knowledge, skill and competence for the awards based on the specified learner profile and the standards for the award.

It should be noted that QQI is currently developing new validation policy and criteria and future apprenticeship programmes will be validated under the new policy when it is available. Lessons from this validation process will help QQI improve its processes and will inform future validation exercises.

It should also be noted that the version 3 curriculum programme has yet to be implemented. The meetings with stakeholders during the validation process discussed experiences with the existing programmes (version 2 curriculum). This makes sense because the proposed changes are incremental.

### 4.2 Awards standards

QQI has determined and published standards of knowledge, skill and competence for each of the five awards to be offered. These comprise (i) craft-specific expected learning outcomes and (ii) expected learning outcomes common to all professional awards by NFQ level. The latter are known

as Professional Award-type Descriptors and range from NFQ levels 5 to 9 (adopted by QQI in December 2014).

The craft-specific expected learning outcomes were proposed by SOLAS and each was independently confirmed as being at NFQ level 6 by an external group (one for each craft) in 2014. The external review process was organised by SOLAS on QQI's behalf. Five detailed reports were produced. These were published by QQI prior to the determination of the standards (December 2014) and were available to participants in this validation process. The availability of these reports simplified this validation process because the NFQ level of the intended programme learning outcomes had already been scrutinised.

### 4.3 Documentation received from SOLAS

A significant volume of detailed documentation was received. This included quality assurance procedures specifically for apprenticeship.

The documentation is detailed here for Carpentry and Joinery but similar documents were received for the other four.

<b>Assessment QA</b>	<ul style="list-style-type: none"> <li>• Apprenticeship Designation Administration (diagram)</li> <li>• Appeal of Assessment Result Procedure</li> <li>• SOLAS Learner Guide to Assessment</li> <li>• SOLAS Policy on Assessment Development, Marking and Grading</li> <li>• SOLAS Procedures for Managing Assessment System Malpractice</li> </ul> <p>Additional apprenticeship-specific documentation was also provided within the main application documents.</p>
<b>Submission Documents</b>	<ul style="list-style-type: none"> <li>• APPRENTICESHIP DESIGNATION ADMINISTRATION</li> <li>• CJ STANDARDS OVERVIEW REV3</li> <li>• MAJOR PROGRAMME DESCRIPTION CARPENTRY &amp; JOINERY AUGUST 2015 (including several embedded PDF documents)</li> </ul>
<b>Curriculum</b>	<ul style="list-style-type: none"> <li>• C&amp;J General Introduction</li> <li>• C&amp;J Introduction 1,3,5,7</li> <li>• C&amp;J Introduction 2,4,6</li> <li>• C&amp;J PH1 REV3 (EVO)+PW</li> <li>• C&amp;J PH3 REV3 (EVO)+PW</li> <li>• C&amp;J PH5 REV3 (EVO)+PW</li> <li>• C&amp;J PH7 REV3 (EVO)+PW</li> <li>• C&amp;J Phase 2</li> <li>• C&amp;J Phase4</li> <li>• C&amp;J Phase 6</li> </ul>
<b>Sample Assessments</b>	<ul style="list-style-type: none"> <li>• C&amp;J Portfolio Phase 6 Assignment &amp; PW</li> <li>• CJ PH4 T1 Sample REV3.x+pw</li> <li>• CJPH6 P2A REV3 A3 Drawing</li> <li>• CJ PH6 T1 Sample Rev 3</li> <li>• CNJ PH2 P1A Sample Rev 3</li> </ul>

	<ul style="list-style-type: none"><li>• CNJ PH2 T1A Sample Rev 3</li><li>• CNJ PH4 P1A SAMPLE REV 3</li><li>• CNJPH4 SD3 REV 3.0+PW</li><li>• CNJ PH6 P2A SAMPLE REV3 + PW</li></ul>
--	--

Access was also provided to SOLAS's online learning portal.

#### 4.4 Validation panel

Details of the validation panel are provided in Appendix 1. Stephen McManus, the validation panel chairman, was secretary to each of the five external panels that reported on the proposed standards in 2014. Simon Watson and Paddy Grundy were also involved in the earlier process.

#### 4.5 Agenda and participants

The agenda and list of participants in the validation process are provided in Appendix 2. The validation panel met with:

- Solas management responsible for apprenticeship and construction services
- Solas apprenticeship programme team
- Apprentice representatives
- Employer representatives
- ETB management and service to business advisors
- ETB instructors (Phase 2)
- Third level institutions and ETB personnel (Phases 4 and 6)

The validation panel is grateful to participants for their candour and their considered feedback.

#### 4.6 Validation process

This validation exercise was time limited. It will be clear from the report that there are some unresolved questions arising from the process. In particular it would have been useful for the panel to have had further time to satisfy itself more thoroughly regarding the efficacy of the assessments and their alignment with the stated outcomes.

This draft report was prepared by the QQI executive in consultation with the panel chairman. A draft was circulated to the panel members for observations.

A draft was sent to SOLAS for observations on its factual accuracy before being finalised.

## 5 Findings

### 5.1 Quality of the application documentation

SOLAS provided a large volume of relevant and detailed documentation to the review panel

The presentation of the application for validation was predominantly descriptive. It did not demonstrate evidence of a systematic self-evaluation against the applicable QQI validation criteria. This is likely to be due to the combination of SOLAS's lack of experience of being subject to peer review as part of a validation process and the lack of timely and sufficiently clear guidance from QQI on how to present the application for validation.

As these programmes will be delivered by a consortium of providers it is particularly important that there is clarity as to the roles, responsibilities of each element of the consortium. Reporting and communication processes as well as action and evaluation procedures should also be specified.

### 5.2 Award standards

The apprenticeship programme documentation presents phase and module-level learning outcomes clearly and the curriculum and assessment are aligned with these. However, module descriptors do not differentiate between module outcomes and indicative content (Appendix C in each application).

The new career portfolio (15% of the programme credit) that will be assembled over phases 2 to 7 has potential benefits.

The demonstration of the alignment of the curriculum and assessment with the stated intended programme learning outcomes (IPLOs, i.e. the overarching standards as distinct from the module and phase outcomes) was attempted but is not clear (e.g. refer to the diagram entitled *Standard Learning Outcomes mapped to Carpentry & Joinery Apprenticeship Programme*). The validation panel is not asserting that the curriculum and assessment is not aligned with the IPLOs but rather that this has not been successfully demonstrated in the application.

It is not clear whether the intended programme learning outcomes have informed the development of the curriculum or assessment or whether they have been derived from them. It is also unclear whether or how they are likely to be used in practice.

The NFQ level of the apprenticeship awards is based on the intended programme learning outcomes and so this is a significant matter which will require the provision of further evidence by SOLAS.

**Validation should be conditional on this alignment being demonstrated and any changes to the curriculum and assessment being implemented within 12 months.**

The applications for validation did not attempt to demonstrate alignment of the curriculum or assessment with QQI's professional award-type descriptors. These descriptors are part of the published standards.

**Validation should be conditional on this alignment being demonstrated and any changes to the curriculum and assessment being implemented within 12 months.**

### 5.3 Curriculum

The validation panel considered the proposed curricula and noted how their development was led by SOLAS and how partners were involved. It notes that all stakeholder groups welcomed the inclusion of communications and team leadership modules within the proposed programmes.

Currently, the best of apprentices are eminently well qualified despite the current curriculum being now dated (circa 2003).

This is due to a number of compensating mechanisms. Capable apprentices who are placed with a competent employer who is committed to their formation will become competent through on-the-job learning regardless of the detailed curriculum. Staff in ETBs and IOTs who keep up-to-date with their crafts can supplement the standard curriculum with more recent technological and regulatory developments. With good employers and trainers the curriculum only needs to guide on- and off-the-job training providers as to the scope of practice for which the apprentice is to be prepared.

As apprenticeship is a work based programme, apprentices are recruited by employers and their progression through the programme is facilitated and monitored by SOLAS. All apprentices must comply with the statutory entry requirements of age and education and are deemed capable of completing the programme on registration.

On the other hand, no written curriculum can compensate for employers who are not fully competent or committed to the formation of apprentices, or teaching staff who are not up-to-date in the relevant crafts.

Several questions follow naturally from this, including:

- What is the optimal balance between the level of detail specified by SOLAS's centrally developed curriculum and the level of discretion (curricular flexibility) afforded to people directly engaged in the formation of apprentices in colleges and in the workplace?
- What needs to be done to ensure that all involved (employers and training providers) are capable and committed, and involved in keeping the taught curriculum relevant?

SOLAS's QA procedures, as they are currently constituted, do not address questions of this nature. As a result, it is not clear to the validation panel where the capacity for strategic direction of the curriculum resides or how effective it is.

This validation process was prompted by the development of the Version 3 curriculum. As stated above, version 2 is about 10 years old. From 2016, SOLAS aspires to ensure that the curriculum is continually updated and this is a welcome aspiration. Presumably this will involve continuous analysis of the evolving needs of the craft and of the effectiveness of the existing curriculum. However, it is not clear to the validation panel precisely how it is planned to do this. However, SOLAS's online learning portal (made available to the validation panel) will no doubt assist in this renewal process.

The validation panel is of the opinion that the curriculum needs to be flexible. It needs to be reviewed annually with a panel including employers, and recently graduated apprentices.

#### 5.4 Assessment

Assessment tasks, model responses, marking schemes and grading/classification schemes are set centrally by SOLAS and marked by off-the-job training providers (ETBs for Phase 2 and IOTs or ETBs for Phase 4 and Phase 6) and on-the-job training providers (i.e. employers) for phases 3, 5 and 7.

On-the-job assessment is binary (either competent or not). Off-the-job assessments are marked out of 100 and grades are awarded in line with current SOLAS policy (fail, pass, merit, distinction).

The current apprenticeship (Version 2) awards may be classified as “Pass” or “Merit”. The new phases 2, 4 and 6 will be graded in line with the QQI norms. It is not clear from the documentation how the overall grade for the QQI award is to be calculated or how the award is to be classified.

SOLAS representatives outlined procedures for the development and peer-review of assessment materials (exam papers and model solutions). (Key Process 4: SOLAS Apprenticeship Assessment Development Process).

The SOLAS application included a comprehensive set of samples of assessment materials for all phases. The inclusion of some innovative assessment was noted by the validation panel e.g. the portfolios.

A centralised assessment system for the established apprenticeships has significant advantages over a distributed approach (where training providers develop their own assessments). Potentially there is an economy of scale and this means that more can be invested in ensuring reliability and validity of assessment and alignment with expected learning outcomes.

The meetings with training providers surfaced anecdotal evidence of some problems with the quality of current SOLAS produced assessment materials. For example, in one case (Phase 4), 4 questions out of 25 were considered unanswerable (owing to a lack of clarity) by the provider administering the test. In the Electrical programme SOLAS uses an online question bank (to provide tests to providers) and it was alleged that questions and model answers are available (this year) on the web for purchase by apprentices. The questions come from a bank of questions held by SOLAS and the panel did not have a suitable opportunity to raise these anecdotal findings with SOLAS.

However, the people who raised issues also expressed confidence that people who qualified do achieve the intended programme learning outcomes. All stakeholder groups met by the validation panel welcomed the proposed changes to the programme assessment.

The centralised collection of assessment results also provides useful data that can be analysed. This can contribute to quality assurance if the information is being used to identify problems and stimulate remedial actions. SOLAS does collect and make use of attrition rates. However, there may be an opportunity for SOLAS to make more use of the data it is gathering for dynamic quality improvement. See also section 5.12 on KPIs.

Internal verifiers and external authenticators (EAs) are used for off-the-job assessments (the EA roles are detailed in the SOLAS documentation received by the panel but the material is dated e.g. references to FÁS). Evidently, the external authenticators are seen by providers as being responsible for checking for consistent application of the SOLAS marking scheme and whether there are any tallying errors. Evidently, a provider is notified when an external authenticator will be appointed for a particular assessment. SOLAS does not check that the internal verification process is carried out for the assessments that are not externally authenticated. There were mixed views from providers on the current roles and responsibilities of the external authenticator.

Given the changed position of the training centres that deliver phase 2, it is not clear how SOLAS will ensure consistency of approach and outcomes across the system.

The workplace assessment is carried out by the workplace supervisor/assessor. An assessment specification and a detailed workplace assessment checklist are provided in each of the on-the-job phases. As many attempts as is reasonable are allowed in order to achieve the required standard in each assessment. The on-the-job assessment arrangements are not subject to external authentication.

SOLAS documentation requires (ref. Point 7 Employer Obligations: SOLAS Standards Based Apprenticeship Code of Practice) that: 'the nominated workplace assessor has completed the SOLAS Assessor/Verifier programme'. However, the validation panel was advised by the Service to Business Advisors that in current practice, an assessment workbook is provided to the assessor but no formal training takes place ("onus on the employer that they implement it...take them through it but working on trust that they implement it"). The SOLAS programme team reported that there is an online assessor workbook for training. The employers indicated that "no specific training is provided by SOLAS" for workplace assessors.

Apprenticeship relies on the workplace assessor to assess apprentices validly and reliably against expected learning outcomes. Currently this is not backed up by external authentication. Inconsistencies are possible. This was discussed with the phase 4 and 6 trainers where it was stated that there is an: "issue of standard applied between companies...one company's poor standard versus another's good standard". They stated that it was evident that there was a variability in the quality of experience that the apprentices receive. It was not evident to the validation panel how recurring deficiencies with respect to particular on-the-job sites could be addressed.

Benchmarking of on-the-job assessment is a significant opportunity for improvement. The validation panel is not recommending how this might be done.

**Validation should be conditional on the role and responsibilities of the external authenticator being clearly defined for apprenticeship programmes and communicated to all concerned (within 12 months).**

**Validation should be also conditional on SOLAS documenting (and where necessary developing or coordinating the development of) procedures for ensuring (within 12 months)**

- **the alignment of assessment with the awards standards and intended programme learning outcomes**
- **the validity and reliability of assessment against standards (this encompasses fairness and consistency)**
- **the quality of the production and design of assessment instruments, materials and model answers**
- **the security of assessment instruments and materials**
- **that assessment results in on- and off-the job phases are benchmarked and corrective mechanisms are implemented (closing the loop)**
- **that on-the-job assessors, examinations authors, and external authenticators are fully competent and that there are training opportunities for those who need them.**

**SOLAS should also clarify the classification scheme for apprenticeships**

## 5.5 Access transfer and progression

### 5.5.1 Access

The minimum standard of knowledge, skill and competence for the registration of an apprentice is five D grades in the Junior Certificate (the SOLAS application includes a range of other educational entry standards for those presenting with other qualifications). However, an apprentice must also be employed by an approved employer and this introduces additional criteria. Currently, most apprentices have completed the Leaving Certificate at registration (overall 72% in 2013 and 55% in 2007).

One might expect that a group of students starting a programme having reached only junior certificate level will find the programme more challenging than another group starting exactly the same programme having completed the leaving certificate. Therefore, QQI requested SOLAS (more than once during this process) to provide completion rates for those entering with junior certificate and leaving certificate respectively<sup>1</sup>. SOLAS did not provide these data during the validation process. The validation panel received conflicting information concerning the relative completion rates. The question about relative completion rates is unresolved. Owing to its importance, its resolution has been made a condition of validation by the validation panel.

**Validation should be conditional on SOLAS agreeing to analyse completion rates and any other relevant data and using this information to help ensure that apprentices who need extra support receive it.**

**It is recommended that QQI formally request SOLAS to conduct an analysis of data on completion and referral rates for the five apprenticeship programmes for the purpose of investigating the suitability of the proposed minimum entry requirements.**

The issue of minimum entry requirements was raised before as noted in SOLAS's application for validation:

*In November 2014 as a result from feedback contained in the QQI Heavy Vehicle Mechanic Standards External Review Group (ERG) Reports an NAAC workshop was held to discuss the Statutory Entry Requirements the resulting committee decision was that the legislated wording was adequate at present but recognises that Employers requirements may be higher than these minimums specified.*

This statement does not, however, explain SOLAS's position. Moreover, it is not clear what 'legislated wording' means. Under section 27(1) of the Industrial Training Act, SOLAS can make "rules in relation to the educational or other qualifications as to suitability to be possessed by persons entering the said employment as such apprentices."

The specification of five D grades in unspecified subjects from the junior certificate examination is not in itself a problem if the apprenticeship programmes adapt to diverse registrants. For example, by including educational needs testing within Phase 1 and suitable bridging studies for students who are missing key skills so that they can achieve parity before Phase 2. Currently no such explicit adaptive arrangements are in place.

Certain subjects are generally regarded as particularly important for success in these five apprenticeships, for example mathematics and English. It is noteworthy that SOLAS will be ensuring that future promotional material makes the mathematical requirements clear to prospective apprentices where appropriate. It should also be made clear to parents, employers and teachers in the school system.

---

<sup>1</sup> Upon being requested to do so by the Authority, a relevant provider, a body authorised by law to make awards in the State or a professional recognition body shall provide any information the Authority requires for the performance of its functions in so far as those functions relate to the functions of the provider, the body authorised by law to make awards in the State or the professional recognition body as the case may be, including information in respect of completion rates, within the time specified in the request. (Section 13(3) of the Qualifications and Quality Assurance Act 2012).

It is important to identify any special education or training needs for each individual registrant early in the apprenticeship (during phase 1) so that supplementary supports can be provided to those who need them.

**Validation of the programme with the entry criteria as proposed, should be conditional on SOLAS ensuring (within two years) that a needs assessment is undertaken early in the apprenticeship for each apprentice and that targeted support is provided to each registered apprentice who needs it.**

The alternative to such a needs assessment during Phase 1 would be an entry (pre-registration) test or equivalent in the subjects that are key to successful completion of an apprenticeship.

**It is recommended that SOLAS systematically evaluate whether the proposed entry requirements are realistic for the apprenticeships as implemented.**

#### 5.5.2 Transfer

**Validation should be conditional on SOLAS providing a transcript to any apprentice who wishes to transfer out of one of these apprenticeship programmes or who is excluded (through failure). This transcript must include statements of any relevant knowledge, skills and competence achieved and by the apprentice and the corresponding FET credit.** The purpose of the transcript is to enable the apprentice to receive due recognition for prior learning when transferring to a different programme of education and training (including another apprenticeship).

#### 5.5.3 Progression

The applications include a general statement on progression. It is important that SOLAS be alert to particular progression arrangements from apprenticeships to other programmes e.g. into the second year of an engineering degree and to the bridging studies (and any other hurdles) that are required. This may help inform future revisions to the curriculum. For this reason **validation should be conditional on SOLAS identifying specific programmes of education or training to which apprentices may progress after qualification for each of the five crafts (within 24 months).**

It is noted that SOLAS's current curriculum reviews are taking account of progression routes for apprenticeships.

Many employers recruit apprentices with a view to keeping them post qualification and training them as middle managers, site foremen etc. These functions are suitable for level 7 or level 8 training. The recent development of the professional award type descriptors envisage the development of programmes suitable for the career development of crafts persons. Any review of the curriculum should strengthen the transfer mechanisms to such programmes.

#### 5.5.4 Recognition of higher level skills

A number of apprentices enter the WorldSkills Competition each year. Apprentices receive extra training for this competition. One panel members put it like this

*“Having been involved in both national as well as international competitions with apprentices, the extra training which the apprentices received was generally outside of the scope of their apprenticeship syllabus. The training was not formalized though very specific.*

*Also the effort to bring the apprentices up to the very high skill level was purely based on the interest of an individual teacher to volunteer to train the apprentice in their own time without recompense, although that never appeared to be an issue.*

*Finally, no recognition of the apprentices' success or achievement in taking part at the national or international competitions appeared on the apprentices' completion certification.*

*As all of this extra training is outside the scope of the apprentice[ship] syllabus ... I believe that the higher level training should come under the auspices of Solas ."*

The formal recognition of these skills is outside the scope of this validation process because these special training arrangements have not been submitted for validation. Nevertheless, the formal recognition of higher level skills is something that might usefully be considered by SOLAS in future development work.

## 5.6 Young persons and children

The Industrial Training Act 1967 distinguishes between dealing with persons who have attained the age of eighteen years and those of have not. SOLAS has determined (under the 1967 Act) that apprentices must be at least 16 years of age. Circa 5% of apprentices are under eighteen years of age. The employment of young persons and children is subject to more recent legislation e.g.

- Protection of Young Persons (Employment) Act, 1996

Provisions for the protection of children and vulnerable persons are set out in the

- National Vetting Bureau (Children and Vulnerable Persons) Act 2012

While the Act of 1996 interprets "child" to mean a person who is under 16 years of age or the school-leaving age, whichever is the higher, for the Act of 2012 a "child" is a person who has not yet attained 18 years of age.

It is not clear to the validation panel whether or not the National Vetting Bureau Act is relevant to apprenticeships or under what circumstances it might be relevant.

The validation panel appreciates that SOLAS has dealt with legislative compliance (by employers and apprentices) in the application. **Nevertheless, for the avoidance of doubt, it is recommended that SOLAS confirm that its apprenticeships (and partners) comply with all applicable legislation relating to children and young persons as there have been significant changes in recent times.**

## 5.7 Diversity

The overwhelming majority of apprentices are males (circa 98%). The low proportion of females is a cause for concern and nobody involved can be complacent about the level of imbalance. There are SOLAS grants to encourage employers to recruit and register female apprentices. **It is recommended that SOLAS look for additional ways to increase diversity.**

## 5.8 On-the-job training provision

### 5.8.1 Suitability of workplace learning

These craft qualifications, particularly Electrical, Plumbing and Carpentry and Joinery are relatively broad. In Electrical there are three strands and all apprentices are nominally qualified in all three strands. In reality they are normally only experienced in one because the on the job training (where most of the learning takes place) will normally only involve one strand. This was raised by the panel that considered the proposed standards in 2014 and it is recommended that SOLAS considers whether the qualification should make the strands explicit.

The breadth of the crafts also poses a challenge for some employers. An employer who specialises in a narrow area might not provide the apprentice with the breadth of experience required by the

prescribed standards. No compensating mechanisms for this came up in the discussions, however, according to the Paragraph 7 under “Employer Obligations” in the Apprenticeship Code of Practice (TSS 8i D13 V4), employers are required to

*Provide access for the apprentice to the appropriate equipment and necessary tools to facilitate the required number of assessments for the on-the-job phases of the apprenticeship. If the employer cannot do so within the time allocated for completion of on-the-job assessments, the employer must arrange, in consultation with its assigned ETB Training Adviser, to have the apprentice trained with another SOLAS approved employer for that particular curriculum item(s).*

This is a sensible provision particularly considering that some employers will not be able to offer the full range of learning experiences. The validation panel did not establish whether or how frequently this is implemented.

This issue was discussed with the phase 4 and 6 trainers where it was stated that: “..[a] lot of responsibility rests with the employer...gap where they don't provide all range of experiences...difficult issue...micro employer likely to give the biggest range of access...bigger employers may not...”

#### 5.8.2 Operational interface with employers

The Service to Business Advisors (sometimes referred to as Training Advisors in the documentation) are the established apprenticeship programmes' interface with employers of apprentices. They have the following functions (according to the application)

- *Approval and Registration of Employers*
- *Apprenticeship Registration*
- *Provide Mandatory Apprenticeship Induction Presentation*
- *Deliver on behalf of SOLAS Apprentice Training Information Pack - curricula, quality assurance and validation requirements*
- *Training and development for the apprentice, in-company manager/verifier and assessors where required*
- *Advice and assistance to employers on all aspects of apprenticeship including their capacity to undertake apprentice training*
- *Application of Procedure 105 Approval of Apprentices for Certification (detailed in Assessment & Certification below)*

The validation application included standard operating procedures and forms for some of these functions. E.g. *Standard Operating Procedure No. 102: Assessing the Suitability of Indigenous Irish Employers to Train Apprentices*

In the discussions it emerged that, contrary to the role set out in the documentation, the Service to Business Advisors only *recommend* registration/approval—SOLAS formally registers/approves.

These individuals are employed and line managed within ETBs (in training centres formerly run by FÁS) but are authorised officers of SOLAS. One of the service to business advisors met by the validation panel has, for example, responsibility for circa 250 employers and a similar number of apprentices. They try to visit employers twice per year. This amounts to less than one day per year per employer and limits how much can be done.

It is noted that the number of service to business advisors (also known as training advisors) has been falling owing to non-replacement of staff who leave. It is also noted that the service to business advisors met by the validation panel feel isolated.

SOLAS indicated during the discussions that it is developing a service level agreement with the ETBs. The panel did not receive a draft of this agreement. Presumably this will clarify the division of responsibilities between SOLAS and the ETBs for interfacing with industry and set out robust reporting arrangements.

According to the Paragraph 4 under “Compliance” in the Apprenticeship Code of Practice (TSS 8i D13 V4), employers are required to comply with

*Section 28 of the Qualifications and Quality Assurance (Education and Training) Act, 2012, as may be amended from time to time. Under this section an employer must meet the requirements as notified by SOLAS and/or the ETB in respect of fair and consistent assessment of apprentices, communications, programme monitoring and verification.*

Section 28 obliges relevant providers. It would appear that this compliance relates to Section 28(6) which states

*A relevant provider or linked provider who organises or procures a programme of education and training which is provided, wholly or partly, by another person shall, in so far as the procedures to be established by the relevant provider or linked provider under subsection (1) relate to that part of the programme provided by that person, agree those procedures with that person.*

SOLAS is required to agree its QA procedures with employers (who are not relevant providers in respect of established apprenticeships under the Act of 2012) and it can use its own powers to do this.

While there are documented procedures that address many important issues, the operation of the interface with employers is the least transparent aspect of the current apprenticeship programmes. Good employers will get by with little support. A key question is whether the current arrangements are effective in identifying and filtering out rogue employers who fail to provide suitable training.

**It is recommended that SOLAS and its partners reflect on how to enhance the quality assurance of workplace training and assessment and seek out new ways of engaging with employers in parallel with the current approaches.**

### 5.9 Off-the-job training provision

Currently this is provided by the ETBs and IOTs. Apprentices are assigned to providers by SOLAS and have no influence on the location of their phase 2 (up to 20 weeks), phase 4 (10-11 weeks) or phase 6 (10-11 weeks) training.

There is evidence (anecdotal from meetings during the validation process and from SOLAS monitoring) that not all off-the-job training centres are equally effective. Training centre performance needs to be actively managed.

When phase 4 and 6 trainers were asked about whether they provided feedback to SOLAS on these kinds of issues they indicated that feedback is sent to SOLAS after the examination board stage.

It is a point of contention with some employers that their apprentices have no choice in where they are sent for off-the-job training.

There is a section in the SOLAS validation application detailing a monitoring function. It is unclear whether the monitoring function (as described in the application) is being currently implemented other than through external authentication, or precisely how it will be implemented in the future. This matter will arise in the process of QQI agreeing SOLAS's quality assurance procedures.

### 5.10 Professional development and performance management

Once a person qualifies as a craftsperson they are considered qualified for life. With a few exceptions, there is no formal licensing and no regulation of continuing fitness to practise. A long qualified craftsperson could possibly be unfit to practise. Accordingly, while qualification as a craftsperson is necessary, it may not be a sufficient qualification when approving persons to be involved in the training of apprentices.

In the meeting with the Baldoyle Training Centre (*Dublin and Dun Laoghaire Education and Training Board*) personnel, the validation panel learned how pedagogical and technical training of staff is linked to the Performance Management and Development System. It is voluntary to a point, but staff can be required to participate in training if they require it but do not volunteer.

ETB staff can take a three month sabbatical in industry every five years—this would seem like an excellent way of keeping up-to-date. Unfortunately, IOT staff do not have this entitlement.

Interviews with apprentices and trainers confirmed that the lack of currency of knowledge does arise in practice.

**It is recommended that an appropriate continual professional development plan should be implemented by both IOTs and ETBs for all staff involved in the education and training and assessment of apprentices.**

A commitment to continual professional development of employees involved in the training and assessment of apprentices should also be required of employers.

### 5.11 Leading collaborative provision

The application included a diagram entitled “Apprenticeship: Designation – Administration – Development – Delivery – Review” provides a birds-eye view of the various agencies and providers involved in established apprenticeships (i.e. offered under the provisions of the Industrial Training Act 1967).

The validation panel was pleased to see that SOLAS is working on a new memorandum of agreement with the Institutes of Technology and Education and Training Boards. A draft of this was provided with the application.

**It is recommended that QQI be included in the consultation process for this document before it is finalised.**

SOLAS is also developing a service level agreement with the ETBs, the validation panel speculates that this is to cover things like the provision of Services to Business Advisors. These roles would formerly have been undertaken by FÁS staff in Training Centres and are currently undertaken (more or less) by the same individuals authorised by SOLAS to give them the necessary legal powers. These *ad hoc* arrangements will need to be systematically reviewed. The Services to Business Advisors (formerly Training Advisors) personnel provide the links with employers.

### 5.12 Documenting quality assurance, identifying good practice and benchmarking

SOLAS has inherited FÁS's role in respect of apprenticeship under the Industrial Training Act 1967. This might lead to the impression that, as far as established apprenticeships are concerned, little of any real significance has changed since the dissolution of FÁS.

The reality is that things are radically different. The link with employers is now mediated through the ETBs and given that this appears to be the weakest link in the quality assurance of apprenticeship programmes this is particularly significant.

Moreover, apprenticeship leading to QQI awards (and SOLAS as a provider of such apprenticeships) is subject to the Qualifications (Education and Training) and Quality Assurance Act 2012 and the changes that occurred following the dissolution of FÁS are profoundly significant in those terms.

SOLAS inherited most of its current quality assurance procedures from FÁS. These quality assurance procedures need to be replaced with updated quality assurance procedures that reflect SOLAS' distinct set of functions and responsibilities and its relatively modest scale (relative to FÁS).

In the meetings with SOLAS's senior managers and its apprenticeship programme team, a range of established apprenticeship-related quality assurance matters were discussed including

- The role of the NAAC
- Evolving relationships with the ETBs and IOTs
  - o SOLAS is encouraging the ETBs to establish something similar to ITAC (Institutes of Technology Apprenticeship Committee)
  - o A service level agreement is being developed with ETBs
  - o A new MOU is being developed with IOTs and ETBs
- Workforce planning process within SOLAS
- SOLAS commissioned studies (e.g. the 2014 study on capital equipment needs in ETBs)
- SOLAS's client services database and monthly standard reports (not addressed in the application documentation)
- SOLAS monitoring of attrition rates and how it reacts to same
- Monitoring the on-the job phases
- Definition of functions and reporting arrangements
- Monitoring and external authentication

It appears that apprenticeships programmes are actively managed by SOLAS in partnership with the ETBs, IOTs and employers; all of which is overseen by the NAAC. The validation panel feels that the application documentation for validation did not coherently present the full range of relevant quality assurance infrastructure that is in place within SOLAS. It also had the impression that there were some open loops in the quality assurance.

The panel is confident that when problems are brought to SOLAS's attention, and it considers those problems significant, it will deal with issues efficiently. Examples of this were described to the panel by the SOLAS representatives. This capacity to react is necessary. However it is not sufficient for the systematic assurance of quality.

While there are detailed operational procedures for many activities, forms and codes of practice and so on, less evidence emerged in interviews of higher order learning-outcome oriented quality assurance activity of the kind that will actively drive continual improvement as distinct from reactively. For example, evidently the NAAC has a steering role but it is not clear how it is kept informed. It was not clear to the panel how the extensive data that is collected is being used to drive

quality improvement. The validation panel is not claiming that higher order QA is absent but rather that it has not been clearly documented in the application for validation. With hindsight, for completeness, it would have been beneficial to have scheduled a session between the members of the validation panel and the NAAC.

At the high end of the spectrum these apprenticeship programmes can, do and will continue to produce world-class practitioners. Unfortunately at the other end of the spectrum things are not as clear right now. The effectiveness of the QA procedures for the on-the-job assessment are particularly important in this regard.

SOLAS has extensive written quality assurance procedures (including detailed standard operating procedures). While this validation process did not allow sufficient time for an in-depth analysis of SOLAS's QA procedures, they evidently require rationalisation and extensive revision.

There is a need for SOLAS to agree Key Performance Indicators (KPIs) to measure attrition, completion and progression rates and to develop a common method of gathering these across the ETBs and IOTs. This will help highlight areas of under-performance within one training provider or across a programme nationally.

The SOLAS apprenticeship and construction directorate has in the region of 60 employees. There are currently 27 apprenticeship programmes. The question of whether there is risk of SOLAS being overstretched by its commitments must be considered.

**Validation should be conditional on SOLAS establishing procedures in writing for quality assurance for the purposes of establishing, ascertaining, maintaining and improving the quality of education, training, research and related services it provides (section 28 of the Qualifications and Quality Assurance Act 2012) as soon as practicable and within 12 months of QQI's publication of its statutory QA guidelines.**

## 6 Conflicting interests

No conflicts of interest were declared by any panel members.

## 7 Consolidated list of conditions and recommendations

1. **Validation should be conditional on this alignment being demonstrated and any changes to the curriculum and assessment being implemented within 12 months.**
2. **Validation should be conditional on this alignment being demonstrated and any changes to the curriculum and assessment being implemented within 12 months.**
3. **Validation should be conditional on the role and responsibilities of the external authenticator being clearly defined for apprenticeship programmes and communicated to all concerned (within 12 months).**
4. **Validation should be also conditional on SOLAS documenting (and where necessary developing or coordinating the development of) procedures for ensuring (within 12 months)**
  - a. **the alignment of assessment with the awards standards and intended programme learning outcomes**
  - b. **the validity and reliability of assessment against standards (this encompasses fairness and consistency)**
  - c. **the quality of the production and design of assessment instruments, materials and model answers**

- d. the security of assessment instruments and materials
  - e. that assessment results in on- and off-the job phases are benchmarked and corrective mechanisms are implemented (closing the loop)
  - f. that on-the-job assessors, examinations authors, and external authenticators are fully competent and that there are training opportunities for those who need them.
5. SOLAS should also clarify the classification scheme for apprenticeships
  6. Validation should be conditional on SOLAS agreeing to analyse completion rates and any other relevant data and using this information to help ensure that apprentices who need extra support receive it.
  7. It is recommended that QQI formally request SOLAS to conduct an analysis of data on completion and referral rates for the five apprenticeship programmes for the purpose of investigating the suitability of the proposed minimum entry requirements.
  8. Validation of the programme with the entry criteria as proposed, should be conditional on SOLAS ensuring (within two years) that a needs assessment is undertaken early in the apprenticeship for each apprentice and that targeted support is provided to each registered apprentice who needs it.
  9. It is recommended that SOLAS systematically evaluate whether the proposed entry requirements are realistic for the apprenticeships as implemented.
  10. Validation should be conditional on SOLAS providing a transcript to any apprentice who wishes to transfer out of one of these apprenticeship programmes or who is excluded (through failure). This transcript must include statements of any relevant knowledge, skills and competence achieved and by the apprentice and the corresponding FET credit.
  11. Validation should be conditional on SOLAS identifying specific programmes of education or training to which apprentices may progress after qualification for each of the five crafts (within 24 months).
  12. It is recommended that SOLAS confirm that its apprenticeships (and partners) comply with all applicable legislation relating to children and young persons as there have been significant changes in recent times.
  13. It is recommended that SOLAS look for additional ways to increase diversity [of registered apprentices].
  14. It is recommended that SOLAS and its partners reflect on how to enhance the quality assurance of workplace training and assessment and seek out new ways of engaging with employers in parallel with the current approaches.
  15. It is recommended that an appropriate continual professional development plan should be implemented by both IOTs and ETBs for all staff involved in the education and training and assessment of apprentices.
  16. It is recommended that QQI be included in the consultation process for [the new memorandum of agreement with the Institutes of Technology and Education and Training Boards] before it is finalised.
  17. Validation should be conditional on SOLAS establishing procedures in writing for quality assurance for the purposes of establishing, ascertaining, maintaining and improving the quality of education, training, research and related services it provides (section 28 of the Qualifications and Quality Assurance Act 2012) as soon as practicable and within 12 months of QQI's publication of its statutory QA guidelines.

QQI's standard conditions of validation also apply and are listed elsewhere.

# Appendix 1



**QQI**

Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

## **PROPOSED A G E N D A**

### **SOLAS PROPOSED PROGRAMMES OF STUDY**

Advanced Certificate Craft Carpentry and Joinery, Level 6, 240 FET Credits  
Advanced Certificate Craft Electrical, Level 6, 240 FET Credits  
Advanced Certificate Craft Plumbing , Level 6, 240 FET Credits  
Advanced Certificate Craft Metal Fabrication , Level 6, 240 FET Credits  
Advanced Certificate Craft Heavy Vehicle Mechanic, Level 6, 240 FET Credits

(The agenda are indicative and subject to change before and during the visit)

#### **Monday 31 August – Alexander Hotel, Fenian Street, Dublin 1**

- 18.30 Private meeting of external review group
- Introductions
  - Overview of standards development
  - Outline of validation process
  - Individual feedback/impressions of submissions
  - Planning the visit
- 20.00 Group dinner

#### **Tuesday 1 September – Solas, Castelforbes Road, Dublin 1**

- 08.30 – 9.15 Private meeting of external review group
- 9.15 – 10.30 Meeting with Solas Management to discuss:
- Apprenticeship: context, quality assurance and overall management of the five craft specific programmes by SOLAS and collaboration with employers, unions, ETBs, third level institutions (for these 5 crafts only)
- 10.30 – 10.45 Tea/Coffee
- 10.45 – 13.00 Meeting with Solas Apprenticeship Programme Team
- Appropriateness of programmes for typical entrants
  - Assessment (end to end)

- Quality Assurance
- 13.00 – 14.00 Lunch
- 14.00 - 15.15 Meeting with apprentice representatives (people who have recently completed an apprenticeship in small firms and large firms). Two breakout sessions:
  - a. Carpentry/Joinery, Plumbing, Electrical
  - b. Metal Fabrication, Heavy Vehicle Mechanic
- 15.15 -15.30 Tea/Coffee
- 15:30 – 16.45 Phases 1, 3, 5, 7: Meeting with employer representatives including small firms and large firms. Two breakout sessions:
  - a. Carpentry/Joinery, Plumbing, Electrical
  - b. Metal Fabrication, Heavy Vehicle Mechanic
- 16.45 – 17.30 Private meeting of external review group

**Wednesday 2 September – Training Centre (location to be confirmed)**

- 09.30 – 10.00 Private meeting of external review group
- 10.00 – 10.45 Meeting with ETB Personnel to include:
  - Management perspective
  - Front line perspective
  - Services to Business: roles and responsibilities
- 10.45 – 11.00 Tea/Coffee
- 11.00 – 13.00 Phase 2: ETB Training Centre Instructors:
  - Breakout Sessions:
    - a. Carpentry/Joinery, Plumbing, Electrical
    - b. Metal Fabrication, Heavy Vehicle Mechanic
- 13.00 – 14.00 Lunch
- 14.00 -16.00 Phases 4 and 6: Third Level Institutions Personnel:
  - Breakout Sessions:
    - a. Carpentry/Joinery, Plumbing, Electrical
    - b. Metal Fabrication, Heavy Vehicle Mechanic
- 16.00 -16.15 Tea/Coffee
- 16.15 – 17.00 Private meeting of external review group

16/09/2015 Finalised report

17.00 - 17.30	Meeting with Solas Management/Apprenticeship Services
17.30	Conclusion of visit.

# Appendix 2

## Validation Panel

<b>PROVIDER</b>	SOLAS	
<b>PROPOSED PROGRAMME</b>	Carpentry and Joinery Apprenticeship Electrical Apprenticeship Plumbing Apprenticeship Heavy Vehicle Mechanic Apprenticeship Metal Fabrication Apprenticeship	
<b>PROPOSED DATE</b>	31 August – 2 September	
<b>PANEL MEMBERS</b>		
<b>NAME</b>	<b>Areas of Expertise</b>	<b>Comment</b>
<i>Stephen McManus, Chair Ex Registrar, DKIT</i>	QA, Validation, Standards	
Brian Lister, Education Consultant, Former Chief Executive Scotland Further Education Unit	Further and Higher Education, Skills, Training and Employment Quality Assurance	
Greer Henderson (TBC) Formerly Further Education and Work-based Learning, Employment Programmes, Youth, JI/DARD/DCAL/Home Office DENI	FET, work based learning	
Anne Carpenter, Programme Director, Lifeline Learning Centre IT Carlow	Teaching, Learning and Assessment	
<b>Technical Experts</b>		
Tom Corrigan, Former Dean of Craft Education and Training, DIT	Academic leadership and management of Dept of Transport Engineering programmes including apprenticeship programmes in Aircraft Mechanic, LVG, HGV, Vehicle Body Repair and Construction Plant Fitter	
Kieran Heavin	Lectured in the trades of agriculture mech/motor mechanic, hgv mech	

Former Head of Department Apprenticeship Services, Athlone IT.		
Pat Thornton Former FÁS Instructor phase 2, former IT Sligo lecturer phases 4 and 6. Involved in setting and marking National and World Skills competitions	Carpentry/Joinery	
Robert Ledwith Instructor, Cavan Institute (Cavan Monaghan ETB) Lectured in DIT, formerly owned Ledwith Garage Ltd	Heavy Vehicle Mechanic	
John Connolly, former Head of Engineering School, DKIT	Electrical	John had to withdraw from the panel prior to the site visit but kindly supplied written observations.
<b><i>Employer/Industry Expert</i></b>		
<i>John Kelly Chief Assistant Technical Services Officer, HSE Estates</i>	Plumbing and Carpentry	
<i>Simon Watson HA O'Neill (Joneseng)</i>	Plumbing	
<i>Paddy Grundy Mercury Engineering</i>	Electrical	

## Appendix 3

# VALIDATION OF FIVE APPRENTICESHIP PROGRAMMES: QUESTIONS ABOUT THE APPLICATIONS

### NOTE

This feedback concerns the validation for the first five apprenticeship programmes (C&J, P, E, MW, HVM).

The standards for these 5 programmes should be read in conjunction with the Professional Award Type Descriptors Level 6. **Minimum intended programme learning outcomes and assessment needs to meet the level 6 indicators in the professional award type descriptors.**

The policy and criteria for the validation of the remaining apprenticeships have not yet been established.

The questions below are included to help provide clarification about the programmes and to facilitate the validation process. Some questions are reiterated under the different headings and this is to reflect the nuances of programme provision and validation.

The applications will be evaluated against QQI's applicable validation criteria. This supplementary list of questions here highlights some matters that appear to warrant particular attention. It will be supplied to the expert group (one or more groups may be used) that will evaluate the application for QQI.

When replying to these and other questions take care to consider all possible scenarios taking into account how arrangements adapt to the range of employers and providers involved. The latter is important because arrangements that work well, for example, for large employers might be ineffective for smaller ones. The reports of the external review groups involved in the development of the awards standards will be provided to the expert group for validation.

Note section 44(7) of the Qualifications Education and Training Act 2012.

### QUALITY ASSURANCE

- A. Where are the SOLAS QA procedures published? Provide the current SOLAS QA documents including those listed in Appendix 4 of *"Continuous Quality Improvement Protocols"*. Are these the procedures that were agreed with FETAC? If not, indicate what has changed.
- B. Are the existing QA procedures still viable given the significant difference between SOLAS and FÁS?
- C. How has the transfer of functions to ETBs been handled by SOLAS and the ETBs? E.g. transfer of training centres
- D. Explain the QA procedures for apprenticeship (we find the Continuous QI Protocols document legalistic and it does not provide a self-contained synopsis of the arrangements) specifically and how they assure the quality of the contributions of SOLAS and its collaborative partners: employers and other providers of education and training.
- E. Are the QA procedures 'watertight'? Are there any gaps or 'blind spots'?
- F. For clarity make references to SOLAS rather than FÁS (except in historical documents e.g. previously agreed procedures)
- G. Collaborative Partners:

- a. Clarify the ETB's responsibilities and its accountability to SOLAS (e.g. management of programme, delivery, assessment, return of results, clarification on roles and responsibility for training centre staff involved in delivery versus staff recruiting to apprenticeship programmes (and have there been any change in the contract arrangements for staff in the ETBs)
- b. Clarify the HEIs' responsibilities and accountability to SOLAS. (e.g. management of programme, delivery, assessment, return of results). Have the IOTs agreed to any new procedures with regard to monitoring in the Institutes of Technology (IoTs).
- c. Statutory Issues: Under the compliance section of the Code of Practice for Employers, employers should ensure and SOLAS check that **Garda Clearance** is received for all persons involved in training those under 18 years of age. This also applies to ETBs and possibly to IoTs.
- d. Details should be available of the SOLS Assessor/Verifier Programme.

## APPRENTICE RECRUITMENT AND ITS IMPLICATIONS

- A. Explain who is responsible for recruiting apprentices and how their individual educational and training needs (including any special needs) are assessed at enrolment and by whom. Where is this information retained and who has access to it?
  - a. For example, there appears to be an onus on the apprentice being able to identify learning issues at the time of registration and how does this equate in practice to their capacity to do so?
  - b. Reference is made to supports such as eCollege (list the precise supports rather than make broad references like this) but how is the correct support determined and facilitated?
- B. Explain how the least qualified entrant will be guaranteed to have achieved all of the expected learning outcomes of the award standard if they successfully complete the apprenticeship programme.
  - a. For those with Junior Certificates how will rapid progress from level 3 learning to level 6 in three OTJ sessions be accomplished?
  - A. Data is required on the individual breakdown by trade of the entry qualification of apprentices, also the age breakdown on those who enter with Junior Certificate. The success rate for those apprentices is required to help us understand whether the people entering at the lower level are significantly less likely to succeed.
  - B. Explain how the programme handles the wide spread in abilities (the percentages of students at the different entry levels are irrelevant to this explanation).
  - C. What is the standard of mathematical competence required to enrol? Entry refers to 5 D's in JC, is Maths mandatory?
  - D. What is the standard of English language competence required to enrol. Is English in JC mandatory?
  - E. Reference is made to equivalence e.g. a pre-apprenticeship programme, where is this provided, has SOLAS formally recognised any for access purposes?
  - F. Are there named subject requirements for individuals presenting with FET awards?
  - G. In practical terms how is recognition of prior learning applied in practice?
- C. Transfer arrangements:

- a. How is this accommodated in practical terms, credit terms e.g. if an apprentice wished to transfer to a different craft area?
- D. Progression:
  - a. Are there any specific arrangements for graduates from apprenticeship to progress to higher levels of the NFQ?
- E. **If SOLAS is statutorily responsible for apprentices then how is this exercised at each phase? An organisational chart indicating who is responsible for apprentices at each phase and the academic oversight of the programme and of individual apprentices. The linkages between each organisation and the lines of control and feedback. A clearer definition of assessment responsibility and decision-making would be beneficial.**
- F. How will SOLAS monitor the overall programme outcomes and manage necessary change in content, process or assessment?

## ASSESSMENT AND STANDARDS

- A. Identify the minimum intended programme learning outcomes (**MIPLOs**) that will be guaranteed to have been achieved by anybody who successfully completes the relevant apprenticeship. Note that QQI apprenticeship standards are threshold standards i.e. you need to achieve 100% of the award standard's expected learning outcomes (ELOs) to qualify for the QQI award.
- B. A programme schedule organized by phases with credits attached to module unit sections would be necessary. (Do students get statements of results at each stage?)
- C. Provide a complete set of specific examples of assessment materials (sample exam papers and such like) with marking schemes in order to allow the expert panel to verify that MIPLOs will be achieved.
- D. Explain how the MIPLOs are assessed (the current document only addresses assessment of module outcomes).
- E. Clarify the responsibility for design of assessment in the off the job phases.
- F. Demonstrate that the MIPLOs are consistent with the relevant QQI award standard and the professional award-type descriptor.
- G. Explain how assessment in the workplace by employers is assured to be valid and reliable for the purpose of estimating whether or not the intended module or programme learning outcomes have been achieved. How is this quality assured?
- H. Clarify credit analysis; e.g. make it clearer were percentage of programme units apply (see reference to programme schedule)
- I. Ensure that no credit is allocated without assessment.
- J. Some clarity is required around the decision making in relation to progression between the phases. How is it recorded, who makes the decision, are there programme boards looking at cohort issues or individual personal academic issues?
- K. Clarify the roles/responsibilities for external authentication of standards, especially in relation to overarching achievement of standards.

## APPRENTICESHIP PROGRAMME GOVERNANCE AND MANAGEMENT

- A. Who is responsible for the overall coordination of the apprenticeship programme? For example provide a list of roles/responsibilities. Does this coordination affect the experience of an individual apprentice from enrolment to graduation?
- B. **Explain the education and training governance and decision making arrangements at SOLAS and how these interface with those of the ETBs, IOTs, collaborating employers and any other providers of education or training. This should be supported by organograms, terms of reference of key committees, role profiles of key personnel.**
- C. Role of Service to Business Advisor on Behalf of SOLAS Apprenticeship – ETB relationship /Service level agreement? How does the process work? Locations (national or ETB specific?) Who is responsible for them?

- D. Explain how the work-based learning environments are quality assured
- E. Phases – clarify number of weeks per phase per craft as there seems to be some differences within documentation
  - o Identify the minimum duration in which an apprentice can complete each programme. For example there seems to be a disparity between the minimum training time and actual apprentice period,

## ON THE JOB PHASES

- o Clarify the detail around ensuring availability of suitably qualified and relevant craftsperson who has been approved to act as workplace assessor with responsibility for training, marking assessments, recording and processing assessment checklists per workplace assessment book.
- o Has the SOLAS Assessor/Verifier programme been updated to reflect the new range of relationships involved in apprenticeship?
- o Monitoring – has this process been updated to reflect the new range of relationships? (note: QQI published its QQI Monitoring Policy in 2014)
- o Are there any unannounced visits? Are they necessary?

## LEARNER EXPERIENCE

- A. Precisely, what learning supports are available to students? This is not clearly addressed in the application (e.g. p12 C&J). Give a complete list of the supports available including pastoral care type supports for example where issues such bullying of younger apprentices, respect for gay young men in the workplace, appropriate supports for female apprentices.
- B. Employers have no QA arrangement with QQI—who monitors the quality of the learner experience when the apprentice is in their workplace?
- C. Clarify the role of the “Service to Business Advisor” is not clear. To whom is this person accountable?

## VALIDATION PROCESS - MEETINGS

The following meetings are proposed:

- 1) Solas:
  - a. Management – apprenticeship context/strategy
  - b. Programme team – programme development process / QA of programme
- 2) Representative apprentices group (near end of programme)
  - a. Experiences with reference to the different phases
- 3) Representative employer group
  - a. Experience with reference to recruitment
  - b. Experience of delivery, assessment
  - c. Support provided by Solas
- 4) Representative ETB group
  - a. Managing the programme
  - b. Delivery/instructions/assessment
  - c. Support provided by Solas
- 5) Representative third level group

- a. Managing the programme
- b. Delivery/instruction/assessment
- c. Support provided by Solas