SUBMISSION TO THE DEPARTMENT OF FURTHER AND HIGHER EDUCATION, RESEARCH, INNOVATION AND SCIENCE

18 SEPTEMBER 2020

QQI
Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Adding Value to Qualifications

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Submission from Quality and Qualifications Ireland on the Consultation Paper: Apprenticeship Action Plan 2021-2025

(18 September 2020)

Introduction

QQI is the independent State agency responsible for promoting quality and accountability in education and training services in Ireland. It was established in 2012. Quality and Qualifications Ireland (QQI) welcomes the invitation (July 2020) to make this written submission on the development of the new Apprenticeship Action Plan 2021 to 2025.

Our mission is to promote the enhancement of quality in Ireland's further and higher education and training, quality assure providers; support and promote a qualifications system that benefits learners and other stakeholders.

QQI's strategic vision is of *'high quality education and training opportunities, enabling learners to fulfil their potential through achieving qualifications that are widely valued nationally and internationally*[1]*'*.

This submission is informed by our position as the national qualifications and quality assurance authority of Ireland. Our statutory functions are aimed at safeguarding the integrity of the National Framework of Qualifications (NFQ), which includes qualifications spanning tertiary education both public and private. Alongside QQI's role as QA authority, QQI is an awarding body. This means we facilitate providers of education and training programmes in issuing certificates to people who have reached the standard for a QQI award. In terms of apprenticeship QQI have awarded 8,968 apprentices since 2015 (Table 1). We have validated 32 apprenticeship programmes, 29 of which are FET apprenticeship programmes (17 craft, 12 consortia-led), 3 are HET apprenticeship (Table 2) programmes and a further 5 new apprenticeships are expected to be submitted for validation this year (September 2020).

Our statutory role is to:

- promote, maintain and develop the Irish NFQ, a 10-level framework for the development, recognition … as a qualifications authority
- make awards and as awarding body awarding qualifications in Ireland

[1] https://www.qqi.ie/News/PublishingImages/Pages/QQIs-Statement-of-Strategy-2019-2021%20Adding-Value-to-Qualifications/Statement%20of%20Strategy%202019-2021%20-%20Adding%20Value%20to%20Qualifications.pdf

- approve programmes offered at a variety of schools, colleges and further and higher education and training institutions
- regulate and promote the quality of programmes offered by providers of education and training leading to qualifications included within the NFQ for the benefit of learners, employers and other interested parties
- provide advice on the recognition of foreign qualifications in Ireland through a service called NARIC Ireland – the National Academic Recognition Information Centre and contact point for information about Irish qualifications abroad.
- inform the public about quality assured education and training programmes and qualifications through a database of programmes and a register of providers
- advise the Minister about national policy on quality assurance and improvement in education and training
- cooperate with professional bodies in assuring the quality of professional education and training

QQI commends both the Department on the depth and breadth of questions in section 4 of the consultation document[2] and SOLAS on the work undertaken to promote apprenticeship in Ireland such as: Generation Apprenticeship, the Schools Competition, Employer of the Year Award and various social media and billboards campaigns.

QQI's response to the consultation document[2] will focus on two areas:

1. Governance of Apprenticeships
2. Quality Assuring the Development and Delivery of Apprenticeships

[2] http://www.apprenticeship.ie/Documents/ApprenticeshipConsultationJULY2020.pdf

Governance of Apprenticeships

As outlined in the consultation document[2], the development, and delivery of an apprenticeship programme, both national craft and consortia-led apprenticeships, leading to a quality assured, recognised qualification on the National Framework of Qualifications (NFQ), involves many different stakeholders, at different stages in the development of a national apprenticeship. In this particular context, the independent actions of any one stakeholder impacts on other stakeholders. As outlined in the Apprenticeship Code of Practice for Employers and Apprentices, '*the apprenticeship is a statutory validated training and education programme… which is enterprise-led in conjunction with relevant stakeholders*[3]'. The QQI guidelines describe the roles (employer, Statutory Regulator, funding bodies, provider, consortium, Apprenticeship Council, QQI) involved in the governance of apprenticeship programmes as part of the QA overview. However, distinction needs to be made between the governance and regulation of the national apprenticeship system, and governance of the delivery of the individual apprenticeship programmes. The complex nature of different stakeholder roles, responsibilities, and relationships in the governance and regulation of the national apprenticeship system is further compounded by divergences between the long-established national craft apprenticeships and recently emerged consortia-led apprenticeships. This complex national governance system as set out in the handbook Developing a National Apprenticeship undoubtedly presents challenges for all involved and in particular for enterprise, in engaging with the national system. QQI would welcome further discussions and consideration of a new coordinated and streamlined approach to the governance of the apprenticeship system.

[2] http://www.apprenticeship.ie/Documents/ApprenticeshipConsultationJULY2020.pdf

[3] http://www.apprenticeship.ie/Documents/ApprenticeshipCodeOfPractice.pdf p1

In a circular issued in 2016 by QQI titled 'New Apprenticeships and QQI'[4] the document clarifies how QQI's awarding, quality assurance and NFQ roles will be carried out in the context of responding to the matters communicated by the Apprenticeship Council. The circular highlights key decisions on standards and quality for what became consortia-led apprenticeships:

1. New Apprenticeships can be made by any awarding body in the State that has, or has been delegated, statutory authority to make awards following programmes.
2. Use of the Professional Award-Type Descriptors[5] (PATD) that are available at levels 5 to 9 of the NFQ in the development of all New Apprenticeships is a requirement of the Apprenticeship Council.
3. Recognition within the Irish NFQ is a requirement for all New Apprenticeships.

These foundational decisions remain valid. Further clarification is sought as to how points 1 to 3 apply to the craft apprenticeship programmes if the current system is to be streamlined.

Governance of apprenticeship programmes

The role and importance of governance in quality assuring providers is to ensure there is a system in place to oversee the education and training, research and related activity of the provider to ensure its quality. QQI's Core Statutory Quality Assurance (QA) Guidelines[6] include guidance for providers on the role of governance in quality assuring delivery of the apprenticeship programme. QQI's Topic Specific: QA Guidelines for Apprenticeship Programmes[7] developed for all providers offering a statutory apprenticeship, emphasises quality assurance procedures of providers that must be supported by fit-for-purpose governance, management and decision-making structures.

[4] https://www.qqi.ie/Downloads/2016-01%20QQI%20CL%20New%20Apprenticeships%20and%20QQI.pdf

[5] Professional Award Type Descriptors (PATD) provide general standards for the development of professional awards within the National Framework of Qualifications.

[6] Core: Statutory QA Guidelines developed by QQI for use by all Providers (2016)

[7] Topic Specific: Statutory QA Guidelines developed by QQI for Providers of Statutory Apprenticeship Programmes (2016)

For governance to be effective, it must be designed to meet not only external requirements and expectations, but also to meet the organisation's needs. As outlined in QQI's Policy on QA Guidelines '*the primary responsibility for quality and its assurance lies with education and training providers*[8]*'.* QQI's Core QA guidelines allow for variations and diversity in the governance structures that are emerging amongst providers. For example: an individual provider could be a coordinating provider for more than one consortia-led apprenticeship programme with different collaborating providers for each programme, in addition to being a collaborating provider for several different apprenticeships (craft and consortia-led), led by different coordinating providers. Furthermore, this model creates tension between the autonomy of the individual provider to operate their own QA procedures for all their programmes and the coordination of multiple discrete national consortia-led programmes.

This is coupled by an expectation that coordinating providers should be responsive to each particular consortium steering group (CSG) each of which has its own sector characteristics. This is a complex and challenging model with potential for risk in implementation and operation of multiple national QA procedures and reporting arrangements. However, QQI acknowledges the challenges in the development and implementation of robust quality assurance to manage delivery of apprenticeship programmes.

QQI would welcome an opportunity to explore existing best practices around governance and various relationships with stakeholders via current consortium or network forums, such as the apprenticeship QA forum network.

To conclude it is imperative for good governance to be present, it is equally important that that there is a separation of roles in particular between corporate and academic decision makers in whatever model of governance is deployed - there must be

'a system of governance that protects the integrity of academic processes and standards[6]*'*.

The role of the corporate decision makers should be one of autonomy, as they determine both organisational and managerial activities; they ensure decisions are made to sustain all business activities and organisational functioning. Whereas the role of the academic decision makers is to ensure curriculum management, imparting knowledge, and skills to learners.

[6] Core: Statutory QA Guidelines developed by QQI for use by all Providers (2016) p6

[8] Policy on QA Guidelines (p.3)

There should be no undue influence exercised by corporate decision-makers over academic decision makers. This '*governance structure enforces separation of responsibilities between those who produce/develop material and those who approve it'*[6].

Roles of an Authority Body

It is acknowledged that developing a comprehensive QA System in a statutory body such as SOLAS poses significant governance challenges. On the one hand, under the Industrial Training Act 1967[9], SOLAS is the regulatory body for statutory apprenticeships in Ireland, among other roles, and it is the coordinating provider for the 25 craft apprenticeships. In its regulatory role, there is a range of responsibilities that it must exercise including interacting with other coordinating providers of consortia-led apprenticeships. In its coordinating provider role, it is required to interact with the validating body, QQI, collaborating providers and also with the regulatory side of SOLAS. It is challenging for any provider to decouple these roles to ensure an overall coherent and comprehensive QA system that is fit for purpose.

Quality Assuring the Development and Delivery of Apprenticeships

Apprenticeship Council

QQI recognises the role and contribution of the Apprenticeship Council, which was established because of a key action in the implementation of recommendations from the Review of Apprenticeship Training in Ireland,[10] to the national apprenticeship system. The Council is enterprise-led with representatives from business, trade unions, further education bodies, the Department of Education and Skills and QQI.

[6] Core: Statutory QA Guidelines developed by QQI for use by all Providers (2016) p5

[9] http://www.irishstatutebook.ie/eli/1967/act/5/enacted/en/html

[10] Review of Apprenticeship Training in Ireland (2014)

They have been tasked with expanding the consortia-led apprenticeship into new sectors of the economy and identifying where there is a demand. They have successfully expanded the number of consortia-led apprenticeships programmes.

The Apprenticeship Council has implemented a formal process for reviewing initial proposals. Part of this process was the establishment of the sub-group made up of SOLAS, Higher Education Authority and the Department of Education and Skills. However, it may be an opportunity to incorporate a technical expert evaluation process at an early stage of the proposal development to avoid as far as possible labour market policy related issues (e.g. how sectors are defined, how consortia are constituted etc.) arising during a formal QQI validation process.

Consortium Steering Group (CSG)

The Consortium Steering Group comprises all of the apprenticeship programme's key stakeholders including employers, occupational associations, any occupational regulators and the Coordinating Provider. Their role is to ensure that the apprenticeship programme conforms to, and evolves with, the requirements of the occupation. Its purpose is to ensure that the '*apprenticeship programme is enterprise-led and meets labour market needs*'[7]. The CSG have a vital role in ensuring that the validated apprenticeship programme remains relevant to the specific occupational role and of ensuring the ongoing QA of the apprenticeship. This is a critical part of the infrastructure of the development of a consortia-led apprenticeship.

Therefore, the CSG plays two roles, one at the initial stage ensuring the development of the apprenticeship programme and secondly, ensuring the sustainability of the apprenticeship going forward. The CSG acts as the 'guardian' of the occupation not just in its inception but in the life cycle of the apprenticeship programme. In QQI's experience there can be a lack of understanding by the CSG of their implementation role once the programme has been validated. There is also a need to have clear mechanisms in place to evaluate the effectiveness of CSGs. QQI's QA Guidelines for Apprenticeship[7] outlines the role of the CSG in the context of quality assuring the apprenticeship programme. This needs to be further communicated and the most effective models for engaging employers and unions (where applicable) need to be explored.

[7] Topic Specific: Statutory QA Guidelines developed by QQI for Providers of Statutory Apprenticeship Programmes (2016)

Furthermore, engagement and support are warranted between the Regulator and the relevant awarding bodies in the development of the CSG role in terms of who is responsible for monitoring and guiding CSGs.

The workplace has both compelling and essential attractions as a learning environment, a good place both to learn hard and soft skills (transferable skills) by working with people in a real-world context. Workplace learning also requires the commitment both of apprentices and employers. This means adequate incentives for employers to offer training places, balanced by effective means of ensuring quality in the training they provide. The incentive for employers offered in the July stimulus package is a welcomed initiative.

Access, Transfer, Progression

'Access, Transfer and Progression' describes the pathways available to learners to enter and transfer between, and progress from programmes of education and training, which are the main route to achieving awards and qualifications[11]. Apprenticeship programmes provide a seamless progression route through tertiary education, a pathway that allows apprentice learner to exit with a nationally recognised qualification both in Ireland and abroad. QQI would like to commend SOLAS on the work done to date to create awareness of apprenticeship programmes. This work needs to continue to attract young people, their parents and those who guide them because they will clearly see its limitless possibilities.

Feedback has indicated that the application process to apply for an apprenticeship, in particular the consortia-led apprenticeships can be very confusing … one possible solution if a similar nationally recognised CAO system could be put in place for potential apprentices to apply for an apprenticeship programme may increase the awareness of apprenticeships.

In terms of progression feedback has been noted from validation panels that there are apprenticeship programmes that are in the same field of learning whereby progression from one programme at level 6 (Advanced Certificate) to another programme at level 7 (Bachelor's Degree) is challenging.

[11] https://www.qqi.ie/Articles/Pages/Access,-Transfer-and-Progression.aspx

QQI's Restatement Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training states that '*providers, in co-operation with the relevant awarding bodies, should identify transfer and progression routes into and onwards from all programmes leading to awards in the framework'*[12]. It is important that those learners who wish to progress get due credit for their prior learning or can access a level 7 programme via an advanced entry point.

There is also a requirement by providers to ensure that there is an appropriate mechanism in place for the recognition of prior learning (RPL) especially for people that have alternative qualifications or industry-based experience. RPL is integrated into the National Strategy for Higher Education to 2030[13] and the National Skills Strategy[14]. The 'Programme for Government, Our Shared Future' commits to '*develop and implement a standardised system of accreditation of prior learning taking account of previous education, skills, work experience and engagement in society'*[15]. This is further supported by QQI's Policies and Criteria for the Validation of Programmes of Education and Training '*the programme includes suitable procedures and criteria for the recognition of prior learning for the process of access and, where appropriate, for advanced entry to the programme and for exemptions'*[16]. Therefore, providers need to ensure there is a robust and clearly thought out process to recognise prior learning.

[12] QQI's Restatement Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training (2015) section 3 p6

[13] https://www.education.ie/en/publications/policy-reports/national-strategy-for-higher-education-2030.pdf

[14] https://www.education.ie/en/Publications/Policy-reports/pub_national_skills_strategy_2025.pdf

[15] https://static.rasset.ie/documents/news/2020/06/draft-programme-for-govt.pdf p115

[16] Policies and Criteria for the Validation of Programmes of Education and Training (2017) criteria 17.4 p32

Conclusion

QQI understands that quality assurance systems, by their nature, should be dynamic and constantly developing. Notwithstanding this, clear principles and good governance must form the foundation of systems development and assure integrity of standards. While it is evident that developments on governance structures have taken place, it is time to review the current apprenticeship process.

The future value of apprenticeships will depend on our collective capacity to offer a learning experience that is flexible, durable and responsive to uncertainty and how society will adapt to the new 'norm' in terms of learning and working.

QQI is committed to continued cooperation and collaboration with all stakeholders to enhance the apprenticeship system.

[12] QQI's Restatement Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training (2015) section 3 p6

[13] https://www.education.ie/en/publications/policy-reports/national-strategy-for-higher-education-2030.pdf

[14] https://www.education.ie/en/Publications/Policy-reports/pub_national_skills_strategy_2025.pdf

[15] https://static.rasset.ie/documents/news/2020/06/draft-programme-for-govt.pdf p115

[16] Policies and Criteria for the Validation of Programmes of Education and Training (2017) criteria 17.4 p32

Appendix A
Table 1 - QQI Number of Apprentice's Awarded 2015-2020

Provider	Award Code	Title	Awarded
Accounting Technicians Ireland	6M20617	Advanced Certificate in Accounting	44
National College of Ireland	6M20520	Higher Certificate in International Financial Services	24
National College of Ireland	8M20516	Higher Diploma in Financial Services Analytics	12
Solas	6M18174	Craft - Carpentry and Joinery	62
Solas	6M18175	Craft - Electrical	436
Solas	6M18176	Craft - Plumbing	56
Solas	6M18194	Craft - Metal Fabrication	71
Solas	6M18195	Craft - Heavy Vehicle Mechanic	61
Solas	930406	Craft - Agricultural Mechanics	163
Solas	930506	Craft - Aircraft Mechanics	117
Solas	930706	Craft - Brick and Stonelaying	55
Solas	930806	Craft - Cabinet Making	20
Solas	930906	Craft - Carpentry and Joinery	593
Solas	931106	Craft - Construction Plant Fitting	228
Solas	931206	Craft - Electrical Instrumentation	176
Solas	931306	Craft - Electrical	2259
Solas	931406	Craft - Fitting	610
Solas	931506	Craft - Floor and Wall Tiling	3
Solas	931606	Craft - Heavy Vehicle Mechanics	381
Solas	931706	Craft - Instrumentation	31
Solas	931806	Craft - Metal Fabrication	421
Solas	931906	Craft - Motor Mechanics	1217
Solas	932106	Craft - Painting and Decorating	35
Solas	932206	Craft - Plastering	48
Solas	932306	Craft - Plumbing	883
Solas	932506	Craft - Refrigeration and Air Conditioning	216
Solas	932606	Craft - Sheet Metal Working	65
Solas	932706	Craft - Toolmaking	258
Solas	932806	Craft – Vehicle Body Repairs	135
Solas	936806	Craft - Industrial Insulation	19
Solas	936906	Craft - Electronic Security Systems	88
Solas	937006	Craft - Farriery	19
Solas	937106	Craft - Print Media	28
Solas	937406	Craft - Stonecutting	10
Solas	937706	Craft - Pipefitting	35
Solas	937806	Craft - Wood Manufacturing and Finishing	77

Appendix A
Table 1 - QQI Number of Apprentice's Awarded 2015-2020

Solas	938006	Craft – Stonecutting and Stonemasonry	12
		Total since 2015	**8,968**

Appendix B
Table 2 - QQI Number of Validated Apprenticeship Programmes (September 2020)

Programme	NFQ Level	Duration	COORDINATING PROVIDER	FET / HET	A
Advanced Certificate in Accounting	6	2 years	Accounting Technicians Ireland	FET	C
Advanced Certificate in Original Equipment Manufacturing	6	3 years	Cavan & Monaghan Education and Training Board	FET	C
Advanced Certificate in Auctioneering and Property Services	6	2 years	City of Dublin Education and Training Board	FET	C
Advanced Certificate in CyberSecurity	6	2 years	Fast Track into Information Technology	FET	C
Advanced Certificate in Computer Programming	6	2 years	Fast Track into Information Technology	FET	C
Advanced Certificate in Computer Networking	6	2 years	Fast Track into Information Technology	FET	C
Advanced Certificate in Culinary Arts	6	2 years	Kerry Education and Training Board	FET	C
Advanced Certificate in Hairdressing	6	3 years	Limerick & Clare Education and Training Board	FET	C
Advanced Certificate in Sales	6	2 years	Mayo Sligo & Leitrim Education and Training Board	FET	C
Certificate in Craft Butchery	5	2 Years	Mayo Sligo & Leitrim Education and Training Board	FET	C
Advanced Certificate in Retail Supervision	6	2 years	Retail Ireland Skillnet	FET	C

Appendix B
Table 2 - QQI Number of Validated Apprenticeship Programmes (September 2020)

Advanced Certificate Craft Electrical Instrumentation	6	4 years	Solas	FET	
Advanced Certificate Craft Industrial Insulation	6	4 Years	Solas	FET	
Advanced Certificate Craft Electronic Security Systems	6	4 years	Solas	FET	
Advanced Certificate Craft Farriery	6	4 Years	Solas	FET	
Advanced Certificate Craft Instrumentation	6	4 Years	Solas	FET	
Advanced Certificate Craft Tool Making	6	4 Years	Solas	FET	
Advanced Certificate Craft Wood Manufacturing and Finishing	6	4 Years	Solas	FET	
Advanced Certificate Craft Brick and Stone Laying	6	4 Years	Solas	FET	
Advanced Certificate Craft Mechanical Automation and Maintenance Fitting	6	4 Years	Solas	FET	
Advanced Certificate Craft Vehicle Body Repair	6	4 Years	Solas	FET	
Advanced Certificate Craft Sheet Metal Working	6	4 Years	Solas	FET	
Advanced Certificate Craft Agricultural Mechanics	6	4 years	Solas	FET	
Advanced Certificate Craft Metal Fabrication	6	4 years	Solas	FET	

Appendix B
Table 2 - QQI Number of Validated Apprenticeship Programmes (September 2020)

Advanced Certificate Craft Electrical	6	4 years	Solas	FET	
Advanced Certificate Craft Carpentry and Joinery	6	4 years	Solas	FET	
Advanced Certificate Craft Heavy Vehicle Mechanics	6	4 years	Solas	FET	
Advanced Certificate Craft Plumbing	6	4 years	Solas	FET	
Higher Certificate in International Financial Services	6	2 years	National College of Ireland	HET	
Higher Diploma in Financial Services Analytics	8	2 Years	National College of Ireland	HET	
Bachelor of Arts (Honours) in Recruitment Practice	8	3 years	National College of Ireland	HET	

Note: one additional apprenticeship programme has been validated not on above table