CDETB

An Bord Oideachais agus Oiliúna Chathair Bhaile Átha Cliath
City of Dublin Education and Training Board

CDETB Submission in Response to White Papers on QQI QA Guidelines

5th February 2016

1. Introduction

CDETB welcomes this opportunity to make a formal response to the two relevant QQI White Papers; QQI Core Guidelines and QQI ETB Sector Specific Guidelines. There are many positives elements which are welcomed by CDETB but the approach and content also raises concerns which need to be properly addressed through meaningful consultation and negotiation.

CDETB is in favour of 'smart regulation' which focuses on improving regulatory approaches; moving away from prescription to an emphasis on the promotion of learning by the regulatory body[1]. This approach is promoted by Irish Government policy in line with guidance from the Organisation for Economic Cooperation and Development (OECD). CDETB is of the view that from a developmental perspective to achieve the best outcomes for FET learners, there needs to be a strong emphasis on collaboration between FET providers and QQIs as the external quality assurance body for our QA procedures. Mutual trust, confidence and respect are key tenets to achieving this.

CDETB is and has always been committed to delivering a high quality service in the interests of its learners. CDETB recognises that the process of external review can be very valuable especially when the appropriate balance is struck between the regulatory and enhancement function of the external QA agency[2].

CDETB notes that as part of QQI commissioned research to inform policy development; participants from the Higher Education sector reported that they had found reviewing their work rewarding and had enabled them to get a much better knowledge and insight of themselves, their work and their strategic and mission related concerns, all of which they found valuable[3].

CDETB, is of the view that to embed the new framework as per the legislation within the FET sector will require time and resources. Consequentially, reasonable expectations must be agreed for the process of change from the outset, if we are to achieve meaningful outcomes.

2. QQI Consultation Process, Sector Structural Reforms and Time Lines

The content of the Guidelines QQI are required to issue under Section 27(1)(a) of the Qualifications and Quality Assurance (Education and Training) Act 2012 [hereafter known as the 2012 Act] is of critical importance to CDETB, and CDETB welcomes consultation in relation to same as provided for under Section 27(2) of the aforementioned Act.

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[1] Review of Reviews, Terms of Reference, QQI, July 2013 section 3.3.
[2] QQI Review of Reviews, Report of the Independent Review Team, March 2014, section 73
[3] QQI Review of Reviews, Report of the Independent Review Team, March 2014, section 68

In the consultation framework QQI states that it '*recognises that stakeholders may need to seek a range of views from within their own organisation or sector and that adequate time must be allowed for this with consideration for the nature and complexity of the documents*'[4].

CDETB wishes to express its serious concerns and dissatisfaction over the dramatic change in terms of the mode of the guidelines from one set of provider specific guidelines to a three tiered approach of core; sector specific and topic specific. This was not the subject of previous consultations which were based on sector specific guidelines. In this same vein, CDETB wishes to also express its grave concerns and dissatisfaction over the extremely limited time line from the issuing of this new version of the guidelines and the deadline for responses to same. QQI have also held parallel consultation for the new guidelines on apprenticeships and the new policy and criteria for QQI Validation. This is not in keeping with the level and degree of consultation which is required for such dramatic changes in approach, the complexity and volume of the documentation and the consequential ramifications for the Further Education and Training (FET) Sector.

The approach taken by QQI in this regard does nothing to inspire confidence in the integrity of the process or the documents produced.

CDETB, is especially concerned in light of some fundamental sectoral issues which still require clarification. Firstly, the status of ETBs as providers versus their centres/training facilities and recognised schools[5] requires clarification. It is not apparent that QQIs governing legislation supports the position of ETBs being providers. In fact, the opposite would seem to be the case; since 'institutions established and maintained by an ETB' are required to apply for validation in their own right[6]. Equally the future status of community providers 'resourced'[7] by ETBs in terms of access to QQI validation[8] requires clarification. ETBs responsibility in terms of governance and management of secondary provider's QA has been referred to in the Guidelines. This requires serious consideration as it has potentially substantial implications for ETBs funding policies in terms of secondary providers.

Secondly, in Section 2 of the sector specific guidelines QQI indicates that they have been devised on the premise that ETBs could have a delegation of authority to make their own awards[9]. While CDETB would welcome such a development, it is of the view that it is premature on QQIs part to be formulating policy on this basis at this point. CDETB, would take the view that this would not be the way in which the issue of community providers can be resolved in the short term. CDETB is of the view that the Guidelines should reflect the current structure of the sector with CDETB open to future engagement in relation to any agreement on delegated authority to make awards.

3. Interaction Between the QA Guidelines, Review Model and Approval Process

CDETB has always taken the responsibility for the assurance of the quality of their own programmes and related services very seriously, involving developing, implementing and monitoring their own strategies and mechanisms for the quality assurance of their provision with a view towards continuous enhancement of quality. CDETB also accepts that in order for there to be reliability and confidence in these processes, review by an external agency is essential. It is hoped this process

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[4] http://www.qqi.ie/Publications/QQI_Consultation_Framework.pdf, page 8.
[5] Section 10 Education and Training Board Act 2013
[6] Section 44 Qualifications and Quality Assurance (Education and Training) Act 2012 as amended by Section 72 of the Education and Training Boards Act 2013
[7] Section 10 Education and Training Board Act 2013
[8] Section 44 Qualifications and Quality Assurance (Education and Training) Act 2012
[9] Section 52, Supra

would also contribute towards enhancement of quality systems. This will come down to the effectiveness of the review model employed by QQI. To this end CDETB wishes to receive clarification on the interaction between the QQI issued QA Guidelines and the review model and approval process for providers QA procedures in particular:

(i)   To what degree will the form of review reflect the QA Guidelines and more specifically; how will the guidelines be used as part of review and approval procedures as prescribed under the 2012 Act?

(ii) Which type of review model for FET providers are the QA Guidelines intended to support; an Accountability Review, Extended Accountability Review, Enhancement Review or a Comprehensive Review?

(iii) What form of institutional review structure are the QA Guidelines intended to support; Whole Sector (one size fits all), Whole-Sector with Core and Sub-sector elements or Sub-Sector Form?

How the Guidelines will be used in terms of the review and approval processes is a matter, which CDETB requires absolute clarity on. Section 27 of the Act states that QQI may issue QA guidelines and procedures for the review of the effectiveness of a provider's QA procedures. In other words, it distinguished between QA guidelines and review procedures. CDETB would take the view that the Guidelines should support the development of the providers' QA procedures which <u>focus on improved outcomes for FET learners versus ease of review by the external QA agency</u>. These two concepts are not necessarily mutually exclusive, however, the primary focus should be on the learner.

4. Interaction Between QQI, ETBs and SOLAS

CDETB takes the view that to effect change in the FET sector there must be an appropriate and complementary level of coordination between the three statutory bodies to avoid *'duplication of effort and conflicts in policy'* [10].This was referred to in the research conducted by QQI in that many respondents in HEIs highlighted the overlap in demands placed on providers through different regulatory functions, creating an '*excessive and unnecessary burden which might be avoided if there was some coordination between the regulatory bodies'*[11]. Interaction and coordination between QQI and SOLAS is essential.

CDETB is of the view that QQI as the National Reference Point (NRP) for EQAVET needs '*to build on and utilise what VET providers have already developed and have in place in relation to data collection systems'*[12]. CDETB also holds the view that ETBs must have sufficient agency to carry out their work and that the experience and expertise accumulated within ETBs is given the appropriate level of recognition and harnessed in terms of policy development.

CDETB take the view that quality assurance also takes in the interaction between ETBs, SOLAS and QQI in relation to the latter's dual role as an awarding body and its management of the National Qualifications Framework[13]. The process of increasing mobility, visibility and consequently attractiveness of labour market qualifications can significantly contribute to improving outcomes for

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[10] QQI Review of Reviews, Report of the Independent Review Team, March 2014, section 93
[11] QQI Review of Reviews, Report of the Independent Review Team, March 2014, section 72
[12] Galvao, M.E., VET providers self-monitoring by using the EQAVET toolbox of indicators (A Guide for National Reference Points)
[13] Report of the Commission to the European Parliament and The Council on the implementation of the Recommendation of the European Parliament and of the Council of 18th June 2009 on the establishment of a European Quality Assurance Reference Framework for Vocational Education and Training; COM (2014) 30 Final

FET learners[14]. CDETB has long held a tradition of being demand led; achieving responsiveness to immediate learners needs, and would take pride in this key feature of the FET sector. Within this 't*he key is to include stakeholders from the world of work in policy making and, if possible, training delivery, and to provide for demand led elements with built- in-responsiveness'*[15]. CDETB is keen to ensure this will continue to be supported and seeks clarification on the operation of Section 48 of the 2012 Act; in general and in particular the meaning of *'within the Framework'.*

5. **The Proposed QQI QA Guidelines**

CDETB, while recognising and being appreciative of the role and guidance of QQI, there are a number of concerns which CDETB wish to raise specifically in relation to the Guidelines;

5.1 The Formulation of the Guidelines – Policy Context and Approach:

CDETB is concerned that the EQAVET Framework and distinct mission and profile of VET providers has not been given due regard in the policy formulation. The EQAVET Framework seeks to stimulate:

1. *The creation of more developed and consistent quality assurance and improvement systems across countries, to contribute to increased effectiveness of training and thereby to enhance the status of VET in the European Union*
2. *Increased transparency of quality assurance and quality improvement systems and approaches in VET, to improve mutual trust and facilitate mobility*
3. *Co-operation and mutual learning, to foster stakeholder involvement in a culture of quality improvement and accountability at all levels.*[16]

The EQAVET framework focuses on mobility but also on improving the outputs and outcomes of VET and making VET more attractive to learners. The Further Education and Training Strategy 2014-2019 is also pursuing these policy goals at national level. It is a basic tenet of any quality assurance system that its processes are *'developed in a way that will not undermine the diversity of missions and institutional profiles, by unintentionally promoting a standard narrow quality assurance model*[17].

CDETB accepts that there are some common issues which exist between FET and HE and that there is merit in attempting to find these common areas to strengthen confidence in FET for progression opportunities in HE[18]. This should be achieved without disadvantaging the FET Sector. CDETB is concerned that the distinct mission and diversity of profile of the FET sector to those of the HE sector were not sufficiently considered at the policy formulation stage. This is born out in the QA Core Guidelines, where the primary emphasis seems to be on guidelines for the HE sector with FET being an afterthought.

The QQI commissioned independent research entitled Review of Reviews, was carried out *'to inform QQI policy development on Review by gathering key recommendations and feedback in relation to options and approaches to review for higher education'*. However, it was flagged by the review team that '*the QQI policy on review is broader in scope, not only in terms of range of providers to be*

[14] Feerick, S. Quality Assurance in Qualifications Frameworks, Conference Proceedings, Dublin Castle 12-13 March 2013
[15] Feerick, S. Quality Assurance in Qualifications Frameworks, Conference Proceedings, Dublin Castle 12-13 March 2013
[16] Galvao, M.E, VET providers self-monitoring by using the EQAVET toolbox of indicators (A Guide for National Reference Points) citing Commission Staff Working Document [SEC(2008) 440COM (2008) 179 final]
[17] QQI Review of Reviews, Report of the Independent Review Team, March 2014, section 95
[18] Report of the Commission to the European Parliament and The Council on the implementation of the Recommendation of the European Parliament and of the Council of 18th June 2009 on the establishment of a European Quality Assurance Reference Framework for Vocational Education and Training; COM (2014) 30 Final.

considered (higher, further and also in the potential range of review types (institutional, thematic, sectoral).

It is striking that firstly, the Further Education and Training Awards Council (FETAC) legacy systems did not seem to form part of the review. Secondly, of the 66 participants interviewed by the research team when conducting their research to inform policy development, only two participants were from the FET Sector (1 from an ETB and 1 from the FET Authority; SOLAS). Review models were benchmarked against the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). There is no reference to the European Quality Assurance Reference Framework for VET (EQAVET).

The focus of these two frameworks is quite different, the former focuses more on the individual institution and on recognition between HEIs within the EU, creating greater mobility while the latter focuses on mobility but also to on improving the outputs and outcomes of VET and making VET more attractive to learners[19]. *The ESG are not standards for quality, nor do they prescribe how the quality assurance processes are implemented, but they provide guidance, covering the areas which are vital for successful quality provision and learning environments in higher education[20].*

The EQAVET framework is grounded on the principle that quality assurance applies across all levels of the system and invokes collective responsibility to work together with all relevant stakeholders to improve VET. Each Level of the System has, therefore, a distinct and important role to play in its implementation i.e. by developing complementary processes that can serve as a catalyst for change and VET improvement[21]. The Further Education and Training Strategy 2014-2019 is also pursuing the EQAVET policy goals and indicators. QQI is the National Reference Point in Ireland for the implementation of EQAVET. This would suggest that there is a possible misalignment between the FET Strategy 2014-2019, which is government policy, and the proposed QA Guidelines.

CDETB accepts that the previous review mechanism which existed for FET provider QA procedures; referred to as monitoring, was different to that in place for the Higher Education Institutions. However, CDETB would take the position that this creates an even greater imperative to ensure the FET perspective and relevant policy goals at both EU and National level inform QQI QA policy formulation.

That QQI as the National Reference Point (NRP) would not seem to be taking sufficient cognisant of EQAVET or FET providers in terms of policy formulation is a concern. It does nothing to address the need to improve the status of FET in general as a key policy objective of EQAVET, not to mention the FET Strategy 2014-2019 which is government policy. This issue was specifically highlighted as needing to be addressed within the Irish Education System in the CEDEFOP Country report[22] . If QQI as the NRP has not seen to give it the same focus and recognition, or parity of esteem, which it gives to Higher Education then this doesn't bode well for that policy aim or inspire confidence among FET providers in QQI as the external quality assurance agency.

In terms of the language used, there is a strong emphasis on the regulatory function especially with the use of the term 'statutory'. CDETB is of the view the correct legal status of the guidelines

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[19] Report of the Commission to the European Parliament and The Council on the implementation of the Recommendation of the European Parliament and of the Council of 18th June 2009 on the establishment of a European Quality Assurance Reference Framework for Vocational Education and Training; COM (2014) 30 Final.

[20] Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). (2015). Brussels, Belgium.

[21] Galvao, M.E, VET providers self-monitoring by using the EQAVET toolbox of indicators (A Guide for National Reference Points)

[22] CEDEFOP – Spotlight on VET Ireland 2014 Report, http://www.cedefop.europa.eu/en/publications-and-resources/publications/8075

requires clarification. However, notwithstanding this issue CDETB takes the position that in terms of their nature they should take a broad perspective setting out the key features of good practice and promote development and professional enhancement, promoting mutual respect and trust to achieve optimum outcomes for learners.

To what degree has QQI considered the findings of their own research in terms of lessons which can be learned by past approaches to review? Participants in the research categorised the engagements as often having an over emphasis on the regulatory function when a more equal and trusting attitude might have in fact lead to a more constructive and productive outcome. The research team put forward that this *'in turn would encourage a more developmental outlook on quality and quality assurance, removing it from a compliance-based imposition to a professionalism-enhancing element in the provision of good education'*[23]

CDETB's requires more emphasis on the FET learner in the guidelines; the learner should be at heart of all policy formulation to ensure optimal outcomes are achieved for them. The key aim of the guidelines should be to support, encourage a flourishing network of FET providers focused on the achievement of outcomes which ensure our graduates in turn flourish in their chosen fields.

5.2 Nature of the Guidelines – Broad versus Prescriptive

CDETB is of the strong view that it was the intention of the legislature in the 2012 Act to give QQI and the provider distinct but complementary roles. This accords with best practice which most European countries have followed by establishing '*quality frameworks that give their VET providers the freedom to decide by themselves which internal approaches, instruments and tools to apply…[and].. this flexibility is fully in line with the EQAVET framework'*[24]. There are basic tasks which must feature as part of internal QA procedures[25] and these features have been enshrined by the Legislature in Section 28 of the 2012 Act as part of the provider's statutory obligation in developing their own QA procedures.

CDETB takes the view that respect for the autonomy of providers and their respective role is a key tenet to producing a relationship between providers and the external QA agency based on mutual trust and respect which is conducive to promoting and enhancing quality within FET.

QQI independently commissioned research team highlighted that QQIs *'effectiveness and acceptance by.. [institutions]..will depend on the way in which it respects the autonomy of each and acknowledges each institution's discretion in taking its own strategic and management decisions within the Irish Legal Framework'.* Clarity is required on what are recommendations and what are conditions to which providers should abide[26]. To use the language of the 2012 Act, providers 'shall have regard to' in terms of the QQI issued QA Guidelines, when providers are devising their own QA procedures which will be subject to review. It is clear that there must be a clear understanding of what the autonomy of institutions actually comprises.

Guidelines are not by their nature considered to be mandatory; they are intended to provide ways to assist, and not to prescribe or regulate. QQI acknowledges this in their own policy on QA guidelines when it states; *QQI Guidelines are not QA procedures or the criteria for assessing the effectiveness of QA procedures*[27].

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[23] QQI Review of Reviews, Report of the Independent Review Team, March 2014, section 54
[24] CEDEFOP, Handbook for VET Providers; supporting quality management and culture, Cedefop Reference series 99Luxembourg: Publications Office of the European Union, 2015, page 17.
[25] CEDEFOP, Handbook for VET Providers; supporting quality management and culture, Cedefop Reference series 99Luxembourg: Publications Office of the European Union, 2015, page 17.
[26] QQI Review of Reviews, Report of the Independent Review Team, March 2014, section 54
[27] http://www.qqi.ie/Publications/Quality%20Assurance%20guidelines%20policy.pdf

CDETB, would be of the view that the legislature was cognisant of the logic set out above, and specifically used the phraseology of 'guidelines' and *'shall with regard to'* in Section 28 of the 2012 Act, which points to the QQI QA Guidelines as being broad in nature setting out the broad parameters which can assist a provider when devising the more detailed provider owned QA procedures. If the Legislature intended them to be more specific and prescriptive it would surely have used the terms it did in other parts of the legislation requiring more specific adherence e.g. compliance with the code of practice under Section 60 of the aforementioned Act.

CDETB, takes the firm position that the QQI issued QA Guidelines should be <u>broad in nature</u> set out the key features of good practice and it is for providers to provide the detail in terms of drafting their own QA procedures as provided for under Section 28 of the Act. They should not be prescriptive in term of the 'how', 'who', 'where' and 'when'. These are matters for the provider to address themselves. This also has the added benefit of allowing providers to be able to take cognisance of new research and developments within the area of quality assurance[28]

5.3 The Quantity of Guidelines and Appropriate Designation of Same:

Following on from the points above, CDETB is concerned at the volume of material being issued which QQI are classifying as QA Guidelines under Section 27(1)(a) of the 2012 Act. CDETB takes the position that there should be one set of overarching provider specific guidelines which applies to them as.

The new approach taken recently by QQI involves the issuing of three tiers of guidelines encompassing; Core, Sector and Topic specific rather than different guidelines for different types of providers. According to the QQI Guidelines Policy document[29] the authority to do this would seem to be predated on Section 27(6)(a) of the 2012 Act which states that QQI *'may… issue different quality assurance guidelines for different relevant or linked providers or groups of relevant or linked providers, and ….establish different effectiveness review procedures for different relevant providers or groups of relevant providers'.* QQI would seem to have interpreted this section as giving them the right to issue as many guidelines and sub sets of same as they wish. CDETBs perspective is that the section provides that QQI can devise different guidelines for different providers instead of having to take a 'one size fits all' approach. It is questionable as to whether the current proposals as stated in the white paper are within the terms of the 2012 Act.

This complex structure will result in a greater increase in detailed specific requirements and increases the scope for encroachment upon the statutory obligation of CDETB to formulate its own QA procedures under S.28, without prescribed procedures being set in place in advance. The issue with this model is that prescription of detailed procedures is set without recognising the provider's; operational context, resources, culture, profile of their learners and national agreements which regulate their relations with other external and internal stakeholder.

CDETB is of the view that the distinction needs to be made between what materials are the 'guidelines' as provided for under the Section 27(1)(a) of the 2012 Act and what materials constitute useful reference material which may be used by the CDETB when formulating its own QA procedures.

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[28] Report of the Commission to the European Parliament and The Council on the implementation of the Recommendation of the European Parliament and of the Council of 18th June 2009 on the establishment of a European Quality Assurance Reference Framework for Vocational Education and Training; COM (2014) 30 Final
[29] QQI Policy on Quality Assurance Guidelines, December 2015/QP.10-V2

The specifics set out in the Guidelines need to be removed completely or designated as useful reference material to aid the ETB in developing their procedures as opposed to Guidelines that the ETBs are being required to have 'regard to' in developing their QA procedures.

5.4 The Scope of the Guidelines.

Scope of External QA Agency

Some aspects of the Guidelines both in the Core and Sector Specific are quite prescriptive, and seek to regulate activities of CDETB or aspects of such with too much specification. Section 28 of the 2012 Act provides *'each relevant provider and linked provider shall establish procedures in writing for quality assurance for the purposes of establishing, ascertaining, maintaining and improving the quality of education, training, research and related services the provider provides'.* The act specifics 'related services' not 'related activities' the latter being a term used within the Sector Specific Guidelines. The procedures '*will cover **all** education and training, research and related activities of the ETBs, regardless of whether or not these lead to QQI awards'[30]*

CDETB strongly contests the assertion that QQI have a role in the evaluation of QA procedures which take account of '*all aspects of the strategy, governance and management of quality assurance throughout the corporate entity'.* And that '*quality assurance spans both the corporate (e.g. governance, finance, human resource) and academic domain*'[31].

CDETB does not regard QQI as having a general power in terms of reviewing and monitoring all provider activities[32] but instead a specific statutory power in terms of monitoring and reviewing a providers QA procedures which take in what is prescribed in the governing legislation[33]

In some instances not only is the level of detail inappropriate but also the area of specification. For example the human resource management activity is subject to other legal, regulatory and industrial relations frameworks. It is within these frameworks that CDETB addresses HR issues. CDETB takes the position that QQI does not have the authority to prescribe in these areas in ways which amount to the rewriting of national agreements which have been entered into by CDETB.

Teachers in CDETB and throughout the wider ETB sector are post-primary teachers. As such they are subject to the Teaching Council Code of Professional Conduct for Teachers. The general functions of an education and training board shall include the planning, provision, coordination and review of the provision of education and training, including education and training for the purpose of employment, and services ancillary thereto in its functional area[34]. The Minister, the school, the Inspectorate and the principal all have statutory functions in relation to ensuring the quality and teaching within a school[35]. While there is no doubt that the quality of teaching has a significant impact on the quality of a programme, given the aforementioned, it is unclear how the quality assuring of teaching and learning comes within the remit of QQI.

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[30] QQI Sector Specific Guidelines for ETBs, Section 2, pg 3

[31] QQI White Paper on QQI QA Guidelines, issued December 2015

[32] Judgment in National Employment Development Training Centre Ltd -v- Minister for Justice & Equality & anor, [2015] IEHC 140, delivered by the High Court on the 01/13/2015

[33] Section 28, The Qualifications and Quality Assurance (Education and Training) Act 2012

[34] Section 10(1)(c) of the Education and Training Boards Act 2013

[35] Education Act of 1998 the Minister (Section 6), the School (Section 9), the Inspectorate (Section 13) and the Principal (Section 23)

CDETB are also concerned that certain aspects of the guidelines go too far in attempting to regulate CDETB's relations with third parties e.g. organisations which are providers in their own right and funded by CDETB, other awarding bodies and strategic partners. This would seem to be at odds with the statutory functions of ETBs as provided for under the Education and Training Boards Act 2013. It also has the potential to breach European Treaty Articles and Directives in relation to access to markets and competition within the single market.

CDETB would not consider it appropriate to engage in the management and governance of other providers it may resource in terms of evaluating their internal QA procedures. Section 10 of the Education and Training Boards Act 2013, sets out the functions of an ETB. There is a distinction made within this section between centres, training facilities and schools 'established and maintained', 'maintained' or 'resourced' by an ETB.

CDETB funds (resources) other providers to deliver programmes of education and training. They are considered providers in their own right and have applied for and are validated to deliver programmes leading to QQI awards, or other awards as the case may be. These providers must be validated and operate their own QA processes and procedures. These arrangements are entered into under Service Level Agreements (SLAs) which prescribe that the provision of funding is dependent on these conditions among others being met. CDETB, would not consider these to be ETB centres or schools.

CDETB considers (SLAs) with the conditions set out above sufficient in terms of its QA responsibility in relation to providers it may resource. QQI possesses the statutory power to validate or not providers requesting to deliver programmes leading to their awards. Therefore, CDETB would be of an opinion that this is a matter which is more appropriately addressed by QQI as part of validation.

CDETB also would not consider it appropriate to engage in the management and governance of other awarding bodies in terms of evaluating their internal QA procedures. One of the policy aims of EQAVET is to achieve mobility for VET learners this would include recognition of awards and qualifications which are on national qualification frameworks of other Member States and subject to similar rigour as Irish awarding bodies. It is also one of the policy objectives to ensure optimal outcomes for learners in terms of employment. Therefore CDETB takes the position that it should not be fettered in selecting the most appropriate awards for learners which are sought by industry, ensuring better employment opportunities for FET graduates.

To achieve these goals, CDETB centres/training facilities and recognised schools enter into contractual agreements with non-QQI awarding bodies but have industry recognition; the responsibilities of the respective parties in terms of implementing QA are provided for in such agreements. CDETB is of the opinion that such contractual agreements are sufficient in this regard and any extension of an ETB's role in terms of governance and management of the other parties QA responsibilities is excessive and unnecessary.

Conclusion

CDETB is firmly of the view, that one set of sector specific guidelines is required (the form that underpinned previous consultation), which caters for the policy aims of FET, and respects its unique mission and institutional profiles. Such guidelines have the potential to house common principles applicable to FE and HE, thereby supporting and strengthening sectoral collaboration and promoting confidence for learner progression. However, this must be achieved without undermining specific FET European, national and sectoral policy aims.

CDETB is also firmly of the view that clarification on the scope and powers as part of the roles prescribed by the 2012 Act and the ETBs governing legislation[36] is essential. This takes in the purpose, nature, form and scope of the guidelines to ensure the respective autonomy of the organisations involved is clear as part of progressing reform within the FE Sector.

CDETB is of the strong view that the autonomy of the provider to develop their own QA procedures as provided for in section 28 of the 2012 Act should not be encroached upon. Thus ensuring that the accumulation of knowledge within the FET sector in relation to its operational context, resources, culture, profile of their learners and other stakeholder obligations is used to inform the formulation of provider owned QA procedures.

CDETB takes the position that 'smart' regulation is key to promoting a collaborative, respectful and trustful relationship in which both the provider and the external QA agency can have confidence. Thus ensuring learning and development are fostered to the benefit of FET learners.

CDETB also takes the position that significant consultation is still required in relation to the issues highlighted above most of which involve very serious implications for the FET sector.

Finally, CDETB require further and more detailed dialogue with QQI in this regard.

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[36] The Education and Training Boards Act 2013