# SUBMISSION TO QQI CONSULTATION PROCESS

Education and Training Boards Ireland (ETBI), response to QQI consultation on:

**Sector Specific Quality Assurance (QA) Guidelines, Statutory QA Guidelines Developed by QQI For Education and Training Boards)**

> *Submitted in collaboration with the FET Directors QA Strategy Group on behalf of the FET Directors Forum*

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## Introduction

ETBI welcomes the consultation process on the **QQI Sector Specific Quality Assurance (QA) Guideline, Statutory QA Guidelines for Education and Training Boards**. In addition, ETBI acknowledges the direct engagement and consultation on the Draft Guidelines with QQI and the sector, through the focussed consultation event for colleagues in ETBI on 1st February, and with representatives of the FET Directors QA Strategy Group at the collaborative ETBI QQI working group meetings.  The observations in this submission reflect these discussions and consultative dialogue, and underpins the verbal feedback already received through this process. It is understood that the sectoral guidelines should be considered in conjunction with QQI Core Statutory QA Guidelines, and that the sector guidelines set out additional, statutory quality assurance guidelines specific to the Education and Training Boards.

ETBI wishes to draw attention and refer to a previous submission made to QQI on behalf of the sector to both the Core QA Guidelines and Sectoral Guidelines in 2016;

'Education and Training Boards Ireland (ETBI) response to two QQI consultation papers: 1. White Paper on Core STATUTORY QUALITY ASSURANCE (QA) GUIDELINES, and 2. Towards a White Paper on SECTOR SPECIFIC QUALITY (QA) GUIDELINES (STATUTORY QA GUIDELINES DEVELOPED BY QQI FOR EDUCATION AND TRAINING BOARDS)' [5 February 2016] https://www.qqi.ie/Downloads/ETBI.pdf.
Some of the observations made in this former submission remain valid and are repeated for this sectoral guidelines' consultation process.

## Observations

### Scope and Applicability of the Guidelines

As was raised in the discussions with QQI, the scope and applicability of the Sectoral QA Guidelines needs to be more explicit and clearly defined.  It is the understanding of the ETBs that these Guidelines and the provider i.e. ETB owned quality assurance procedures apply specifically to those education and training, research and related activities in Further Education and Training in the ETB.  It is understood that it is the scope of the QA 'procedures for any individual ETB will depend upon the structure of the ETB in terms of the diversity of the (FET) education and training activities and the scope of (FET) provision'. (p4). *It is not the understanding of the ETBs or ETBI that the scope and applicability of these guidelines extends to quality assurance of ETB provision and services in second level schools or community national schools.*

*QQI is requested to make this explicit within the Sectoral Guidelines.*

### Governance and Management

The Education and Training Boards Act (2013) outlines the overarching governance of the ETBs carried out by the ETB Boards.  The functions reserved to the Board are set out in the 2013 Act, the 'reserved decision-making functions' of the Board include, matters concerning committees set up by the Board, this includes establishment and operation of a Finance Committee and Audit Committee.   Governance and management of quality assurance is an executive function within the ETB.

ETBI acknowledges the external requirements of QQI and other stakeholders in relation to governance systems in the ETBs and the element of necessary compliance in the development of any governance and quality management system. Through the FET Directors Forum and QA Strategy Group, the ETBs are seeking to establish a governance and quality management model for the sector which will be articulated and supported by a sectoral handbook. In moving towards the establishment of this governance model for the sector, it is the view of ETBI that the external requirements of QQI and other stakeholders should be met in a manner that tangibly benefits the ETBs.

The governance and quality management system needs to be a means of supporting the business of ETBs; this is consistent with the principle of 'provider-owned' quality as outlined in QQI's quality policy. The draft sector specific QA Guidelines refer to 'the distributed, diverse and evolving nature of the ETBs', as an underpinning principle and guideline on governance, it is recommended that commonality of approach to governance and quality management adopted in the sector, not uniformity, but commonality and consistency should be actively promoted through the sector QA Guidelines, this something that can be established and communicated by the sector as a core pillar within its QA Framework, and indeed reputation.

It is recommended to QQI, that the Sectoral QA Guidelines could be enhanced by further contextualising ETB governance, with references to ETB statutory governance structures are set out in the Education and Training Act (2013) and the Code of Governance of Education and Training Boards[1].

## Review of Staff Performance

Section 4 refers to quality reviews of staff performances, these guidelines are sector specific, it should be noted therefore, in the body of the document, or as a footnote, the existence of national collective agreements and infrastructures for staff review (and recruitment), this is the national IR context within which ETBs operate.

As outlined in page 7 of the former ETBI submission (February 2016); 'the quality and professional development of staff, both teaching and support staff, is of paramount importance to ETBs. As public statutory entities, ETBs must operate and adhere to a range of government department, statutory and regulatory body requirements. In particular, the DES, SOLAS and the Teaching Council set out certain parameters within which ETBS must operate; this includes policy, procedures and requirements with regard to staff recruitment, qualifications, management and review. The review and evaluation of mechanisms for staff qualifications and staff performance should not be within the remit of QQI guidelines or indeed of QQI to evaluate. ETBI would have serious concerns that QQI would establish criteria in this regard'

The Guidelines, as they are currently worded, could be interpreted as requiring new performance review processes to be established for staff, any such processes would need to be developed in collaboration with the Department of Education and Skills and the trade union partners. It is *not* envisaged, in the development of new QA procedures required to meet both statutory core and sectoral QA guidelines that ETBs will be establishing new staff

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[1] Available at https://www.education.ie/en/Circulars-and-Forms/Active-Circulars/Code%20of%20practice%20for%20the%20governance%20of%20Education%20and%20Training%20Boards%20ETBs.pdf

review processes, the guidelines as currently worded could lead to misinterpretation and unforeseen consequences.

*QQI is requested to amend the guideline in this regard.*

### Terminology
ETB Colleagues have flagged the use of 'institution-wide' and 'institutional' as not being wholly appropriate, as these terms are not used within the sector. The use of sectoral appropriate terminology was raised within previous consultation submission.

### Learner Records
In addition, colleagues have flagged concern with regards to the guideline on leaner records, that these should be held indefinitely by the ETB, as outlined at the consultation event, this is not current practice within the sector and is not considered practical.

## Other Parties Involved in Education and Training

### ETBs collaborating on a national basis
ETBs have, through ETBI, established robust formal collaborative structures, including amongst other groupings, an FET Directors Forum, FET Directors QA Strategy Group, FET Directors Apprenticeship Strategy Group and a Quality Assurance Forum.   There is also a HR, Communications and Finance Forum, and in place a collaborative FET Directors/QQI group.  Within the national strategic context for the ETBs, ETBI considers it an oversight that that sectoral guidelines do not at least acknowledge the collaborative infrastructure and engagement within the sector, this is a core strength for the sector.  ETBI considers it also a lost opportunity that the sectoral guidelines do not more strongly promote such collaboration and the establishment of common ETB QA pillars and approaches within the sector.  This is the approach which is being taken by the sector, there are a number of sectoral QA projects which are being overseen by the FET QA Strategy Group.

The approach to establishing common ETB QA framework is being adopted to meet the requirements of QQI topical guidelines for new apprenticeships.  Establishing a common approach and sectoral infrastructure will, it is envisaged, significantly strengthen quality assurance of new apprenticeship programmes and overarching governance in the sector.

### ETBs collaborating with other providers, partners and other awarding bodies
ETBs have a multitude of relationships and arrangements with other providers, some of these have evolved historically through legacy arrangements and agreements on shared programmes, this would include for example with Schools sector and some of the Community and Voluntary sector.  ETBs also have a funding relationship with providers, including on a contracted basis for second providers, and on a grand aided basis for Community and Voluntary sector providers.  The complexities, historical evolution and legacy QA arrangements of some of these relationships are not fully reflected within the guidelines, and do fall neatly into collaborating provider relationships.   As outlined in the ETB legislation, the ETB sector could make available some of its supporting infrastructure to some provider groupings, i.e. shared curricula, EA national panel, without necessarily have the quality assurance responsibility for these providers. ETBs have a historical collaborative relationship with each other on shared programme development.

It is recommended that these relationships need to be identified and considered separately as they are distinctly constructed relationships, and would need to be considered under the following headings:

**1. Collaboration with other providers** – could include an ETB/IOT/other provider

**2. Relationship with Community and Voluntary Sector FET**

**3. Relationship with Contracted Training** (A new contracted training procurement framework is being established by SOLAS for the ETBs.  The quality assurance arrangements for contracted training suppliers within this framework warrant further discussion with ETBI (ET Directors), QQI and SOLAS.  It is recommended that as a minimum the sectoral guidelines should refer to this framework)

**4. Relationship with Schools Sector**

This was outlined in detail within the former consultation submission as indicated in the extract below,

'Collaboration and Relationships ETBs are committed to working collaboratively to developing a common quality assurance framework; built on core agreed pillars of activities. There is a long history of collaboration across this sector, this has been further enriched since amalgamations. Through this amalgamation process and the transfer of relationships with former FÁS providers and the complexities of quality assurance relationships established through former legacy FET awarding body processes, ETBs have inherited a number of complex relationships with providers (and trainers), Specialist Training Providers and Community Training Providers. Also, through nationally agreed former arrangements with DES support is provided through the ETBs to other DES providers, for example in sharing programmes and curricula, and support services (FESS) i.e. voluntary second schools and community schools sector. Many of these providers have a QA relationship with QQI through the transition of legacy processes. The focus for the ETBs is on the enhancement of their own QA process and ensuring there is appropriate risk management and governance in this regard. ETBS have funding and support relationships with a diversity providers, this does not by implication mean a QA relationship. The complex nature of the transitional and second provider relationships, the challenges of regularising them and the implications of what is outlined in the Guidelines will need to be further explored. ETBI welcomes further engagement with QQI on the issues and concerns raised in this submission; it would also welcome the facilitation by QQI of national dialogue with other key stakeholders; including the DES and SOLAS. The establishment of new (*sectoral*) QA Guidelines has wide reaching implications for the FET sector nationally.' *(Section 2.3, p, 8)*

The quality assurance relationship between the ETBs and providers in legacy processes that have leaned on the sector for parts of their QA infrastructure warrants further discussion with ETBI (FET Directors), QQI, SOLAS, DES and relevant provider representative bodies.  This has also been previously called for as indicated in the above extract.

ETBI would welcome further discussion and a revised draft of the sector specific QA guidelines, taking cognisance of the former and current feedback from the sector, and the proposed national dialogues.

Ends