QQI Consultation on the White Paper on Statutory Quality Assurance Guidelines for Apprenticeship –

Submission of IOTI

IOTI welcomes the publication of the draft topic-specific quality assurance guidelines for use in the development and quality assurance and enhancement of apprenticeship programmes. The publication is timely, as it clarifies a significant number of the quality assurance and awarding issues pertaining to apprenticeship, and will thus greatly facilitate the efforts of both the Apprenticeship Council and the enterprise/provider consortia that are currently working on the development of new apprenticeships. In this regard, IOTI also welcomes the strong endorsement given by QQI (implicit throughout the draft guidelines) for the recommendations that emerged from the 2013 Apprenticeship Review, particularly in relation to the 'essential characteristics' of Apprenticeship programmes (pp. 5-6); and the requirement that the established apprenticeships will 'transit' to the new quality assurance arrangements set out in these guidelines.

The document is helpful in providing definitions of the different partners, and their respective roles, that participate in the development and delivery of apprenticeship programmes, from prospective employers of apprentices, practitioners in the occupation, and occupational associations and regulators; through providers of education, and state agencies involved in funding and regulating apprenticeships; to the apprentices themselves. Given the range and complexity of participating stakeholders, the White Paper has provided important guidance in setting out how these stakeholders can organise themselves in a workable manner so that apprenticeships will be subject to an appropriate quality assurance and enhancement regime. IOTI considers that the two options that have been put forward in the guidelines are reasonable. Consortia working on the development of apprenticeships have the choice of either identifying or establishing a legal entity as a new provider to oversee the quality assurance arrangements (as Coordinating provider) of the apprenticeship programme under development, including the establishment of a relationship with QQI; or identifying an existing relevant provider to take on the role of Coordinating provider.

QQI also identifies five stages in the development of an apprenticeship from the initiation of the concept, and state approval to develop the occupation (encompassing the development of an occupational profile); through programme development and validation, and programme provision and learner assessment; to review and periodic revalidation of the programmes. It is of note that the QA guidelines only relate to Stages 2-5 (programme development through to review and periodic revalidation), and that within these stages the Coordinating provider plays the central role in overseeing the quality assurance arrangements and in maintaining the critical QA relationship with QQI. IOTI acknowledges and accepts that technically this makes sense and that QQI's statutory role in QA relates exclusively to its relationship with relevant providers. Nevertheless, this technical emphasis, and the manner in which it is expressed in the document may give the impression, no doubt unintended, that enterprise/business partners in Apprenticeship consortia play a subsidiary role to that of the

Coordinating provider. Perhaps some stronger statements could be made to the effect that the leadership role expected of enterprise and business (as set out in the Apprenticeship Review) will take place to a large extent in Stage 1 (where the formal QA arrangements do not formally come into play). Something stronger might also be said about the role that enterprise/business will play in the programme development/validation stages, i.e., that it will be something more than simply being consulted with. Perhaps the role of enterprise and business might be strengthened in the Programme Board (see especially 3.7.3 (d) and (e)), where it might have more responsibility for the development of 'systems that ensure the employer and labour market trends influence and lead curriculum development', or in putting together the memoranda of understanding and agreement with employers and professional bodies, which commit all parties to a 'process of implementation of the agreements'. Conversely, these roles might be assigned more directly to the Consortium, rather than the Coordinating Provider and Programme Board, where it could be argued the enterprise voice would be stronger.

In general, there is some ambiguity about the role of the Coordinating provider in the guidelines. Is the Coordinating provider simply an overseer of quality assurance as one might expect? Or has the Coordinating provider the primary leadership and management role in apprenticeship consortia? Perhaps this is reflective of a view of quality assurance and enhancement which is all encompassing. If so, further consideration should be given to the question as to whether such a view of quality assurance is compatible with a view of apprenticeship that is intended to be enterprise-led. In this regard, there is also an argument for insisting that the Technical and Market Assessment (3.7.4), like the development of the Occupation Profile and its application (3.7.5), should be absolutely rooted in Stage 1, for it is here that the opportunity for enterprise leadership is at its strongest. Similarly, there is also question as to whether the market research and analysis, and the systematic consultation process mentioned in section 3.7.7 is better located in the wider Consortium group than the Programme Board. Given all this, even if QQI proceeds with the schema set out in the White Paper, there will be a need to keep the guidelines under review (perhaps as soon as the first batch of new apprenticeships come on stream) to determine whether they are supportive of the intentions in the Apprenticeship Review that apprenticeships should be enterprise-led.

There are also other issues that require further consideration and clarification. For example, some of the issues set out in 3.7.9 (Programme Design for Quality On the job training), especially the establishment of a systematic approach to the approval of employers for inclusion in a register of approved of employers of apprentices, seem to touch on areas of governance that have not yet been fully discussed or determined by the Apprenticeship Council. While the approach set out in the White Paper may be the appropriate or even optimum way of proceeding, there may be a need for further discussion with the Apprenticeship Council to clarify this before the guidelines are signed off by QQI. The issue of 'Matching Training Capacity to National Demand' (3.7.11) is another issue that touches on the broader governance of the national system of apprenticeships. IOTI would consider that the Coordinating provider is only one of a number of stakeholders that will be responsible for the development of mechanisms 'to smooth recruitment to levels consistent with strategic long term labour market demand'. Again this is an issue that needs further discussion with the Apprenticeship Council as part of a broader discussion on governance of the system.

Overall, then, IOTI is broadly supportive of the approach set out in the White Paper, particularly in relation to the role of the Coordinating Provider and Programme Board taking on the classical programme development/validation/delivery and periodic review roles. However, IOTI considers that some more thinking may be needed to clarify the role of the Coordinating provider vis a vis the Consortium; and how the enterprise-led dimension of the apprenticeship development will be accommodated. In a similar vein, there is also a need to achieve an appropriate balance between the roles of the Programme Board and the wider Consortium and, indeed, to determine whether in fact they are coterminous. As presently framed, the quality guidelines are comprehensive and ambitious and seem to imply that the quality system is responsible for the leadership and management of the apprenticeship development process as a whole. IOTI concedes that this might be an appropriate approach as an initial starting point, but that it will need to be kept under review to see how effective it is once it has been tried.