

NAPD-FE response to White Paper on Statutory Quality Assurance Guidelines for Apprenticeship

NAPD-FE welcomes the opportunity to provide feedback on this White Paper. Many aspects of this White Paper are beyond the remit of NAPD-FE Principals/Deputies such as MOA's and MOU's. However NAPD-FE schools and colleges are currently involved in the provision of some of the established trades and in addition a number of our FE colleges and schools are involved in the development of new apprenticeships.

It is very welcome that new apprenticeships are being considered and developed. NAPD-FE schools and colleges are recognised hubs within communities where new apprenticeships can be delivered.

Rigours surrounding QA are very welcome in NAPD-FE schools and colleges and can only serve to underpin the good quality work that is already taking place. NAPD-FE recognises the importance of commencing a new programme of Apprenticeship with the QA policies and procedures in place. However NAPD-FE is concerned that these draft guidelines are pointing to NAPD-FE schools and colleges operating a Higher Education approach to QA which knowing that the Higher Education structures and supports are not in place.

NAPD-FE has a wider concern that on a national level our FE Principals/Deputies are not supported in their current role to get involved in the delivery of new Apprenticeships. This White Paper proposes a shift from current practice in order to establish good quality assurance in place. NAPD-FE members do not have the local resources to either get involved in a new apprenticeship or be part of a consortium. NAPD-FE is concerned that there is a general lack of understanding of what happens on the ground in NAPD-FE schools and colleges and the rigours that are proposed will make involvement in new apprenticeships a difficult task. In this regard NAPD-FE extends an invitation to QQI to meet with the committee to discuss the realities on the ground i.e. the lack of resources and the funding and operational models that NAPD schools and colleges operate under. NAPD-FE is of the view that strategy development can only work if current operational needs are considered.

Two of NAPD-FE schools and colleges operate the current SOLAS QA framework for established trades. This works well and has never been an issue in relation to QA. If these proposals in this White Paper are adopted then the provision of in these two schools and colleges will be in jeopardy as they will be unable to participate in the re-validation of these programmes unless resources are in place. This could lead to the cessation of these programmes in these two schools or colleges which will have a knock on effect of teachers not having a timetable to work from.

NAPD-FE welcomes the development of Occupational Profile and this can only help to assist learners in their career choice and NAPD-FE schools and colleges in delivery of new Apprenticeship Programmes.

NAPD-FE recognises that in order to develop new apprenticeships, involvement with employers is paramount. This is good practice as this will assist in producing learners with the skills for the economy which all governmental reform agendas are pointing to. NAPD-FE is however concerned about the ability to engage employers in the process and the ability of its FE members to be able to engage with employers while managing the current teaching and learning that is taking place. It is not a reality that local employers will engage effectively with the process as they are too small. NAPD-FE is of the view that this White Paper is aimed at those major employers who have the ability and staffing to get

involved in instructing, quality assurance and the rigours of on the job assessment as outlined in this White Paper.

There is a lot of emphasis on the different stakeholders involved in the process of developing and delivering new apprenticeships. The many different roles are outlined in this document, however with many stakeholders, even at a primary level, there is a real risk to the professionalism of the governance and administration of the new apprenticeship as NAPD-FE schools and colleges are not resourced to oversee the delivery. NAPD-FE is of the view that the rigours proposed in this document will limit its member's involvement in new apprenticeships. This could stifle the development of new apprenticeships programme and will point new apprenticeship back to IOT's and Universities who are currently resourced to deliver new programmes.

The contract of employers is essential to new apprenticeships. If this contract breaks down the reality is that the apprenticeship will look to the coordinating provider for a solution. Once all avenues are exhausted the coordinating provider will have to provide work stimulated training in order for the apprentice to complete the programme. The reality is that many of the NAPD-FE schools and colleges are not resourced in equipment or space to complete this aspect. This prohibits NAPD-FE schools and colleges from becoming involved.

NAPD-FE schools and colleges do not have delegated authority therefore the validation steps apply. These are too rigorous for NAPD-FE schools and colleges to become involved with as NAPD-FE schools and college lack resources and funding. This White Paper introduces a HE institutional based QA model into FET. This will stifle any development from NAPD-FE schools and colleges.

NAPD-FE realise that there are many risks associated with new apprenticeships. These include the provision of teaching and learning and within NAPD-FE schools and colleges these are governed by the teaching contract and teachers union agreements. Identification of risks can happen, however unless the teaching contract is reviewed in relation to performance then these types of risks cannot be addressed (teacher underperformance and refusal to engage in retraining or upskilling).

In relation to the community of practice NAPD-FE schools and colleges do not have the funding model to include apprenticeships as part-time programmes therefore drop in facilities would not be available to apprentices. In addition many apprentices present with health and learning difficulties. Apprentices currently do not qualify for support under the HEA Fund for Learners with Disabilities and the provision for supports for apprentices in our NAPD-FE schools and colleges is not-existent. In order for NAPD-FE school and colleges to provide these services the funding and operational models would have to change.