

Submission on the Review of Apprenticeship Training in Ireland   
  
September 2013

# Introduction

QQI welcomes the Review of Apprenticeship Training in Ireland. It provides a timely opportunity to consider apprenticeship in the context of growing national and international interest in dual modes of education and training and work based learning generally. It also provides an opportunity to explore the role played by employers in education and training and how this might develop.

As the Review is progressing concurrently with the reformation of both the further and the higher education and training systems, the circumstances are favourable and the opportunity is ripe to introduce an innovative approach and achieve a coherent outcome. It will require effective collaboration and good communication between all change agents and overarching leadership.

The current apprenticeship system has facilitated the training of thousands of apprentices (mainly male) since it was established in the 1990s and produced some world class graduates While generally understood to be well regarded, it is noteworthy that neither the craft awards standards nor the apprenticeship programmes have so far been externally reviewed by QQI (or its predecessor FETAC).

QQI’s interest in the Review reflects its statutory role in assuring: the quality and relevance of the craft award standards; the quality of apprenticeship programmes; the national and international status and recognition of the craft awards; access, transfer and progression opportunities for learners and safeguarding the integrity of the National Framework of Qualifications (NFQ).

In this context QQIs key recommendations are:

* Promote approaches to learning that are based on real tasks, in real time, for real purposes, in real environments
* Build a flexible delivery model that facilitates greater opportunities to promote apprenticeship training across a broader range of sectors, a larger number of employers and potentially attract an expanded and more varied learner cohort
* Build on the experiences and outcomes of best national and international practice, particularly recent innovative approaches designed to meet the needs of specific occupations and/or sectors
* Develop a comprehensive apprenticeship system incorporating a range of award types and levels reflecting the complexities and needs of different occupations and/or sectors
* Ensure effective collaboration between the key constituencies, in particular between employers and education and training providers
* Consider a non-statutory system and governance approach involving a mixture of some central coordination (top-down leadership) that encourages distributed self-organisation (bottom-up initiatives)
* Ensure quality underpins any new, adapted or revised apprenticeship system
* Maintain explicit criteria for the selection and retention of employers who wish to participate in apprenticeship programmes
* Consider ways of assessing or recognising learning awarded in other jurisdictions towards a craft qualification; promote international apprenticeship exchanges; and further enhance recognition of Ireland’s craft qualifications abroad by more finely aligning apprenticeship qualifications with the National Framework of Qualifications (NFQ) and the European Qualifications Framework (EQF)
* Maintain access to practice-oriented modes of learning for learners at lower secondary level
* Facilitate multiple entry points to an apprenticeship programme and multiple transfer and progression opportunities to other programmes of education and training recognising previous educational attainment
* Look outside the state for occupational standards and for connections with international communities of practice
* Establish relevant and appropriate structures to ensure assessment methods are valid and reliable and consistently applied within and across providers including employers.

# QQI

QQI is the state agency responsible, among other things, for the development of the NFQ and for quality assuring providers of both further and higher education and training. In May 2013 QQI published a comprehensive range of consultation papers related to its future strategy[[1]](#footnote-1) and policies[[2]](#footnote-2) including Provider Access to Initial Programme Validation, Protection of Enrolled Learners, Fees for QQI Services and Awards and Standards[[3]](#footnote-3). It also published *Qualifications systems and related concepts – a QQI background paper* [[4]](#footnote-4) which sets out a conceptual model for the qualifications system. That paper envisages responsibilities for quality assurance and improvement and for the maintenance of qualifications standards being disseminated over many different kinds of agents within the system. It explains the importance of trust. It emphasises the need to understand the roles employers, education and training providers, professional/practitioner associations, regulators, and others can and/or do play in the qualifications system. The model may be helpful to the review of apprenticeship and informs our response.

QQI plans to publish its Strategy Statement by the end of the year outlining its own strategic goals and priorities for 2014-2016. Also, recognising the important role played by enterprise in the development of qualifications, QQI plans to publish an Enterprise Engagement Strategy for consultation with a broad range of stakeholders including industry and the social partners.

QQI is the awarding body which certifies learners who successfully complete craft apprenticeship programmes. It issues the Advanced Certificate at NFQ Level 6 to candidates deemed by FÁS (the primary provider of apprenticeships) to have reached the standards for the award. As the statutory awarding body, QQI is responsible for determining the award standards for apprenticeship awards. ‘Award standard’ in this context means an expression of the expected knowledge, skill and competence to be achieved by candidates for the award. QQI determines the standards, following the completion of a consultation process involving relevant stakeholders including providers and industry.

QQI is also the external quality assurance body for the providers delivering apprenticeship programmes, this includes FÁS, the Institutes of Technology and the Education and Training Boards (ETBs).

We note that FÁS is currently reviewing a number of apprenticeship curriculums. This has resulted in, among other things, proposed new standards of knowledge, skill and competence. FÁS is in the process of undertaking an external review of the proposed new standards. The external review process will evaluate the NFQ level of the proposed standards among other things. QQI will evaluate the proposal when it is received from FÁS and as custodian of the NFQ will ensure the outcome is compliant with framework requirements. QQI is also required to validate the revised apprenticeship programmes.

# NFQ and Craft Awards

The NFQ was launched in 2003. The qualifications made by national awarding bodies in Ireland (the State Examinations Commission, the Universities, the Dublin Institute of Technology, the Royal College of Surgeons in Ireland, the Institutes of Technology (under delegated authority from QQI), FET Awards Council and HET Awards Council) are recognised within it. It was one of the first national frameworks to be developed in Europe. In 2006 all craft apprenticeship awards were placed on the framework at the same level (level 6). This was a pragmatic decision at the time.

With the development of the EQF and other national qualification frameworks, the single alignment of all Irish apprenticeships is stark, compared to the spread of levels similar apprenticeship qualifications are placed across, in other European countries. The *Framework Implementation and Impact Study[[5]](#footnote-5)* commissioned by the NQAI and published in 2009 recommended the revisiting of *“the inclusion of all craft awards at one level*” as it negatively impacts on progression and the comparability of awards.

# Issues for consideration

Defining apprenticeships  
The term apprenticeship is open to wide interpretation. One such interpretation is that an apprenticeship is a programme of education and training designed to enable a learner (the apprentice) to become a recognised practitioner in a specified occupation, where the learner spends part of his or her time studying formalities or academic topics (in a school or college) and part learning to become a practitioner by practising under the supervision and mentorship of qualified practitioners in the occupation concerned (the quality of the master-apprentice relationships is key). Understood this way, apprenticeship might be applied to educational programmes for many and varied occupations.

There is a fundamental rationale that warrants the promotion of approaches to formation, learning, education and training (particularly in VET) that are based on learning through real tasks, in real time, for real purposes, in real environments rather than simulated ones.

There is no single ideal apprenticeship model. The optimal is situational. Therefore, different occupations may favour different models. However, here are perhaps some broad principles that can apply to any apprenticeship programme:

* Apprenticeship is a programme of education and training designed to enable a learner (the apprentice) to become a recognised practitioner of a craft or profession (i.e. to become a recognised practitioner in an specified occupation)
* Where the learner spends part of his or her time studying academic topics (in a school or college) and part learning to become a practitioner by working (including practice of the craft or profession) under supervision of qualified practitioners (in their normal place of work), developing relevant knowledge, skills and competences
* The workplace provides authentic learning opportunities; regular assessment by and feedback from competent practitioners (of the craft); and includes inculcation of the apprentice into the craft or profession’s community of practice.
* It is applicable at all career stages (not just initial VET), wherever there is a well-defined and stable occupation (craft or profession) and at all levels of the NFQ
* It is adapted to the specific needs of the occupation (craft or profession) concerned.
* The learning process is transformational.

In addition, like any education and training programme that is recognised within the NFQ, apprenticeship programmes should be based on relevant and robust standards, be underpinned by quality assurance and comply with national policy, procedures and criteria on access, transfer and progression.

Flexibility It is generally observed that the current apprenticeship model has a number of inbuilt rigidities including: the **number and range of occupation**s (26 occupations across 5 trade families, involving a limited number of sectors); **fixed duration** (4 years), **block phases** on-the-job (2, 4 and 6) and off-the-job (1, 3, 5 and 7), a **single level** on the NFQs (level 6), **one qualification type** (Advanced Certificate) and **one exit point** at the end of the apprenticeship journey.

These rigidities significantly limit the capacity and scope of the current system, compared to systems in other jurisdictions, particularly in the context of responding or adapting to meet future labour market needs, facilitating sectorial work practices and/or when considering extending the apprenticeship method of education and training to other occupations beyond the traditional crafts (e.g. childcare, health care, ICT, business).

A more flexible delivery approach (including facilitating e-learning) may provide greater opportunities to promote apprenticeship training across a broader range of sectors, a larger number of employers and potentially attract an expanded and more varied learner cohort including females, those who otherwise may choose the higher education route and adult learners.

### Collaboration

The roles and responsibilities of the key constituencies – employers, education and training providers, practitioner associations (communities of practice), regulators and funders in the development, provision and quality assurance of apprenticeship programmes and the establishment of the standards need to be clearly defined.

Collaboration between the key constituencies is essential, in particular between employers and education and training providers in order to maximise opportunities for learners in terms of knowledge acquisition and practical skills development. Professional or occupational associations are also essential participants in supporting the quality of programmes and the maintenance of up-to-date awards standards (against which candidates are assessed).

### Governance

Regarding the Review’s question concerning governance, it might be useful to consider a non-statutory system and governance approach involving a mixture of some central coordination (top-down leadership) that encourages distributed self-organisation (bottom-up initiatives). Diverse arrangements may be warranted subject to a few unifying principles. The NFQ could be one such unifying principle; guidelines on the quality of teaching and learning opportunities another; having nationally adopted awards standards (trusted and endorsed by stakeholders) and reliable and valid arrangements for (consistent) assessment are also important.

### Quality

Quality is a complex and critical issue that must underpin any new, adapted or revised apprenticeship system. It is distributed across the education and training system and involves a number of agents. At a systems level the state’s funding agency and external quality assurance agency will play key roles to assure quality and ideally their activities will be consistent and mutually supportive.

At the level of provision, providers have primary responsible for the quality assurance of their programmes, even when part of the delivery is delegated to a partner organisation. This includes all arrangements they enter into e.g. collaborations with employers and/or other providers.

### Employer Involvement

There are observed inconsistencies regarding the quality of the delivery of the current on-the-job training phases. Not all employers are necessarily suited to providing the training environment, training, mentoring and support required by apprentices. However, this capacity can, in principle, be developed and augmented. It is important therefore to maintain explicit criteria for the selection and retention of employers who wish to participate in apprenticeship programmes. Nationally, many employers, particularly SMEs would certainly need support and possibly incentives to enable their participation.

In some jurisdictions e.g. Australia, there are employer associations that help support involvement in the training of apprentices. For example, apprentices can transfer between employers in the event of changing economic or other circumstances.

### Approaches

The experiences of Teagasc, Failte Ireland, BIM, FÁS, Skillnets and other industry led initiatives, REAP[[6]](#footnote-6) and other provider-industry collaborations in higher education and the practices of professional bodies (e.g. accounting, nursing) will inform the Review.

Recent innovative approaches to programme design and delivery include more customised education-industry engagements. For example, in the private sector:

* the partnership between Lidl and Dublin Business School regarding the development and delivery of a 3 year Retail Management Degree (Level 7) programme (accredited by QQI) which includes a significant (50%) work-based learning component.
* The Irish Payroll Association (IPASS) offer a number of programmes (accredited by QQI) for payroll personnel. The programmes were designed following consultation with payroll professionals in industry and the public sector and are delivered in the main in the work-place.

A new apprenticeship system should build on the experiences and outcomes of best national and international practice, particularly recent innovative approaches (as above) designed to meet the needs of specific occupations and/or sectors.

## A new framework architecture for apprenticeship awards

The above approaches may help support the development of a comprehensive system of apprenticeship levels reflecting the complexities of different occupations’ and sector needs. It might even be desirable to develop a system of apprenticeship award-types over a range of NFQ Levels (perhaps starting at 4-6 and expanding upwards later). Such award-types would be discipline independent. They could be accompanied by quality assurance (including accreditation) guidelines for apprenticeship programme. Both could be supported by QQI.

**International recognition**It is important for Ireland’s craft persons and professionals that their qualifications are recognised abroad and this will be better facilitated where and when they are more finely aligned not only with the NFQ but also with external benchmarks from other European countries and EU benchmarks such as the EQF, as noted in the *Framework Implementation and Impact Study*.

QQI through its Recognition Service is acutely aware of the needs of employers in terms of their experiences when attempting to recruit individuals who hold qualifications made outside the state, particularly apprenticeship type qualifications. It may be worth considering ways of assessing or recognising learning awarded in other jurisdictions towards a craft qualification including making more use of ECVET[[7]](#footnote-7) and/or ECTS[[8]](#footnote-8) whichever is appropriate.

It may also be worth promoting international exchanges for some apprenticeship programmes, again making best use of credit systems and availing of European funding streams launched to support the development or further development of apprenticeships within and across Member States.

### Access, transfer and progression

Current apprenticeship programmes provide an alternative route for learners at lower secondary level who prefer a practice-oriented mode of education and training to an academically oriented one. It is important that access to practice-oriented modes of learning, from at least this level, is maintained.

Assuming an apprentice will progress into the workforce it is necessary that his or her basic general education is complete. This includes general knowledge, language and literacy, citizenship, general scientific and technical knowledge and skills, mathematics and numeracy and learning skills (to equip them for progression). If this general education is achieved prior to apprenticeship then it need not be included again in the apprenticeship programme. If not then apprenticeship as a potentially terminal programme of education and training must include them as mandatory. It is feasible, and maybe even optimum to have multiple entry points to an apprenticeship programme depending on previous educational attainment.

It is practice in a number of jurisdictions to facilitate access to apprenticeships to adult learners. Particularly in the context of adults, it is important that due recognition is given to prior learning including certified and non-certified. Education and training providers should have transparent, rigorous, fair and flexible systems in place to allow for the assessment and/or accreditation of prior experiential learning for such purposes. This should apply both to access and to partial or total exemption of certain parts of the programme.

Apprenticeship programmes should also facilitate apprentices to transfer and progress to other programmes of education and training from any articulation point within the apprenticeship programme and have their learning duly recognised.

## Occupational standards

QQI’s concept paper on the qualifications system[[9]](#footnote-9) and its Green paper on Awards and Standards[[10]](#footnote-10) distinguish between occupational standards and educational standards and point to the dearth of occupational standards in Ireland.

Occupational standards are the responsibility and concern of employers, regulators, professional recognition bodies and occupational associations. They tend to be more specific than educational standards. As outlined in the above papers a new, more coherent and effective approach to organising occupational standards in Ireland is warranted. Apprenticeship is one of the few areas where Ireland has *de facto* occupational standards and a formal, organised, infrastructure in which they can be developed and/or recognised. However, Ireland is a relatively small country, and it could be argued that this precludes the establishment of infrastructure that would be useful in a larger country. On the other hand the world is becoming more connected—virtual networks and communities thrive in some fields. Some qualifications already transcend borders notably the IT industry ‘Vendor Qualifications’ of Microsoft, CISCO and others. Communities of practice can also cross borders—this is *de rigueur* in sciences and the professions and increasingly feasible in other areas. These observations motivate the conclusion that Ireland can and should look outside its territory for occupational standards and for connection with international communities of practice where it lacks the resources at home and needs to build capacity.

## Assessment

However apprenticeships are organised it is critically important that assessment methods are valid and reliable. In principle, assessment can be organised on a central or distributed basis. There are inherent risks in both, particularly the latter which need mechanisms to ensure national consistency.

It is critical that relevant and appropriate structures are put in place to ensure consistency within and across education and training providers including employers. Conflicts of interests are among the challenges that have to be tackled. Without good assessment, standards will fall inexorably and the qualifications will be undermined.

# Closing comments

Stimulating the kind of transformation needed will require change in knowledge, skill and competences (including attitudes) among teachers, employers, regulators, legislators, parents, learners, occupational practitioner associations among others.

QQI can help facilitate change through the provision (and endorsement) of tools for the recognition of qualifications, through its NFQ standards and guidance (including if required the development of new and innovative award types) and through its quality assurance of national and transnational provision of education and training including collaborative provision.

The QQI executive looks forward to working with the Department of Education and Skills and other stakeholders to further elaborate on the issues raised in this response.

1. http://www.qqi.ie/Consultation/Pages/Strategy.aspx [↑](#footnote-ref-1)
2. http://www.qqi.ie/Consultation/Pages/White\_Papers.aspx [↑](#footnote-ref-2)
3. http://www.qqi.ie/Consultation/Pages/Green\_Paper.aspx [↑](#footnote-ref-3)
4. http://www.qqi.ie/Downloads/Qualifications%20Systems%20and%20related%20concepts.pdf [↑](#footnote-ref-4)
5. http://www.nqai.ie/documents/FIISreportFINALsept2009.pdf [↑](#footnote-ref-5)
6. Roadmap for Employment-Academic Partnership [↑](#footnote-ref-6)
7. European Credit System for Vocational Education and Training [↑](#footnote-ref-7)
8. European Credit Transfer System for Higher Education [↑](#footnote-ref-8)
9. http://www.qqi.ie/Downloads/Qualifications%20Systems%20and%20related%20concepts.pdf [↑](#footnote-ref-9)
10. http://www.qqi.ie/Consultation/Pages/Green\_Paper.aspx [↑](#footnote-ref-10)