

## Submission 4.28 [FET Colleges Ireland](#)

### Background

The National Association of Principals and Deputy Principals (NAPD) is the professional association for all Principals and Deputy Principals in Post Primary Schools, Further Education and Training (FET) Schools and Colleges in Ireland. Further Education and Training Colleges Ireland (formerly the NAPD FET Committee) is a Committee of NAPD, representing Principals and Deputy Principals from over 100 FET Schools and Colleges in Ireland under the auspices of the three managerial bodies, ETBI, JMB, and ACCS. Established in 2000, this committee has represented NAPD on many State Boards, national working groups, and committees involved in FET. In addition, a nominee of this committee is a member of the NAPD National Executive and works with the NAPD Executive in addressing FET issues as they affect Principals and Deputy Principals in their role in leading and managing their Schools and Colleges.

This submission is based on the collective experiences and knowledge of Principals and Deputy Principals who are involved in delivering many different FET programmes such as:

Apprenticeships (Pre- and Post-2016)

PLC Programme

Traineeships

Skills ETB

Momentum

BTEI

VTOS

Adult Education – part-time night provision

FET Colleges Ireland Schools and Colleges have been catering for a diverse range of learners on the above programmes for many years.

Direct entry from second level schools

Direct entry from the senior cycle at special national schools

Direct entry from Youthreach centres

Recently unemployed

Long-term unemployed

Those up-skilling

Those retraining

Those seeking employment

Part-time Night Students

Graduates

International students

Those who do not thrive in HE and revert to FET

Mature learners

Early retirees who are seeking a career change

Those seeking a change of career

Further Education and Training Colleges Ireland (FETCI) continues to seek the full completion of the FET sector reforms in Ireland. In line with the FET Strategy 2020-2024, FETCI is advocating for the establishment of a formal FET College Sector in Ireland as the foundational pillar of a world-class system of FET provision. In particular, we are working to achieve:

A new FET College of the Future, separate from post-primary sector, which will consolidate all level 5 and level 6 provision;

An integrated funding model for all FET provision;

FET provision that will be flexible, available 12 months of the year, during the day, in the evening and on weekends;

A 2+2/2+1 model of tertiary education in which the first two years of post-secondary provision could take place in the FET College with progression to year three in higher education (HE) in a University or Institute of Technology;

Teaching support staff to support the teachers in the development and delivery of programmes;

Integrated system of learning supports for all FET students;

Educational technologists, IT support staff, and Access teams to support the learning within FET Colleges;

FET Colleges to be properly resourced with a fit-for-purpose middle-management structure.

Introduction

FET Colleges Ireland welcomes the opportunity to contribute to this public consultation of the National Access Plan 2022 – 2026. With the establishment of the new Department of Further and Higher Education, Research, Innovation and Science (DFHERIS), momentum towards the government's goal of an integrated tertiary education sector has increased. While the consultation paper published as part of this process refers to "Equity of Access to Higher Education" (DFHERIS, 2021, p. 2), this submission is placed within the context of FET Schools

and Colleges as part of such a Tertiary Education Sector. Consequently, the proposals in this submission will be under the following headings:

Learner Pathways

Supports from FET Students

Building Capacity within FET Schools and Colleges

Towards an Integrated Tertiary Education Sector – a Process of Convergence

A particular feature of the current policy landscape has been the convergence of FET and Higher Education (HE), at both the policy and institutional levels. This process of convergence has its foundations in the developments in relation to qualifications and the National Qualifications Framework in the 1990s and 2000s. In recent times, this convergence has become apparent in the establishment of a single division in the DES for Higher and Further Education and Training Policy, as well as the strategic engagements between the SOLAS, QQI and the ETBs. In 2018, the Department of Education and Skills' Statement of Strategy (DES, 2018) stated:

“Increase the alignment of higher education and further education and training to achieve a more integrated tertiary education system” (p.14).

This was reiterated in the Action Plan for Education for 2019 (DES, 2019):

“Develop a framework for an integrated strategic approach to tertiary education” (Action 64.1, p.41).

Speaking at the ETBI Conference in 2018, Dr Pdraig Walsh, CEO of QQI, in referring to the obligation of ETBs in relation to Quality Assurance, stated that “the development, compliance and reporting responsibilities of the ETBs are now commensurate with those for higher education” (Walsh, 2018). Indeed, in its recent Statement of Strategy, QQI stated that the ETBs would be subject to an Institutional Review model based on the CINNTE model that applies to the Institutes of Technology (QQI, 2018). This is in line with the ambition to see ETBs assuming Delegated Authority to make QQI awards. Similarly, the Strategic Performance Agreements concluded recently between SOLAS and each ETB, were based on the model used for similar agreements between the Higher Education Authority and the third-level institutions.

Indeed, the recent programme of reforms in both FET and HE, have highlighted a number of areas where the desired degree of synchronisation between the various elements has yet to be achieved. For example, with FET Colleges now occupying the space originally the domain of the

Regional Technical Colleges, and now Institutes of Technology, the duplication of provision at level 6, and in many cases, level 5, is a source of tension between the two sectors. In addition, the persistence of two sets of awards at level 6, one for FET and one for HE, has been an issue for some time. FET Colleges Ireland welcomes the QQI research project currently under way in this area and looks forward to the outcome. For further discussion see O’Callaghan and O’Sullivan (2019).

A further area, which has come to the fore, is the progression of FET graduates through the CAO system into HE programmes. While national targets have been set in this area, the lack of consistency and transparency persists and also requires attention.

The FET Colleges Ireland Vision for a unified tertiary sector is that, firstly, a new governance model for a FET College and a new FET Teacher contract are put in place. Secondly, following a rationalisation of the two sets of awards at level 6, a 2+2 model of tertiary provision could be developed (See Figure 1). This would involve FET providing up to the new single level 6 (or first two years of higher education), and higher education providing from level 7 to level 10. Transparent and equitable progression pathways would exist between year two of FET and year 3 of higher education.

Figure 1: From FET to HE – a 2+1/2+2 approach

FET Strategy 2020-2024

The second FET Strategy (SOLAS, 2020) states:

“This strategy sets out to do this by simplifying the FET structure, improving access to it, supporting its learners consistently, and building its provision around a distinct, diverse and vibrant community-based FET college of the future” (p.16).

It further elaborates, “It then sets out a vision for FET’s development over the next five years, based around three pillars of skills, pathways and inclusion” (p.17).

The FET Strategy 2020-2024 states:

“The ability to build skills that are relevant to the economy, and to offer inclusive provision that supports citizenship and sustains communities, are two core attributes of FET” (p.45).

FETCI is of the view that all learning at all levels should be valued equally. Every learner should be encouraged and supported to achieve his or her own goals. The education system in general, and FET in particular, must ensure that any arbitrary system, administrative or procedural barriers are removed, or at least mitigated to the greatest degree possible. Taking a Universal Design approach the new unified FET system of provision should seek to include and support as many people as possible, and to the greatest extent possible in learning throughout their life (SOLAS, 2021).

## 1. Learner Pathways – Towards an Equal Chance of Success for All

Equality of opportunity is not enough. The new unified learner-centred FET system of the future must ensure to the greatest extent possible that every learner will not only have an equal chance to access a course, and an equal chance to participate on a course, but also have equal chance to succeed. This includes success in assessments, progression to further study, and/or employment.

According to the Qualifications and Quality Assurance (Education and Training) Act 2012, access to a course is defined as

“access by learners to programmes of education and training, including recognition for knowledge, skill or competence previously acquired” (Section 2(5)(a)).

This definition does not specify which type of learning should be include. With education internationally, there has been a tradition of requiring formal educational qualifications as part of the entry requirements. FETCI is of the view that this practice is narrow and exclusionary. The definition above includes all forms of learning – formal, informal and non-formal learning.

In Ireland, in particular, there has been a long history of not valuing vocational qualifications over the academic qualifications provided through the state examinations system. It is interesting to note that the various access programmes for higher education and based on the prerequisite of having a Leaving Certificate.

Currently, within the FET to HE pathway, QQI qualifications at Level 5 on the National Framework of Qualifications (NFQ) are given a maximum value of 390 points in the CAO system in the Institute of Technology route, while the Leaving Certificate, also at Level 5, has a maximum value of 600 points (not including bonus points). Further discussion of this pathway will be made below.

In this context, it is worth re-quoting Busemeyer (2015) as we did in the last section:

“...variations in the institutional setup of the education and training systems do have enormous consequences for the distribution of skills, income, and wealth in the political economy at large” (p.2, emphasis in the original).

## 1.2 Learner Pathways: Access to, Progression through, and Graduation from FET

In the view of FETCI, the key to simplifying pathways is to fully implement the National Framework of Qualifications (NFQ). Since the 1990s, when frameworks began to emerge internationally, the issue of access, transfer and progression has been high on the agenda. The launch of the Irish NFQ in 2003 was a seminal moment for the entire education system in Ireland. It has facilitated the simplification of connections between courses at different levels. The entire system now needs to embrace the spirit of the NFQ and remove the final system, administrative and procedural barriers to achieving optimal learning pathways for all learners.

This sentiment equally applies to all of us in the FET sector. While our diversity is a strength, it can also be a de facto weakness. The historical fragmentation and siloed approach to FET provision to date has, in effect, discouraged progression with FET provision. Within a new unified FET system of provision, learner pathways into, through and beyond FET will be facilitated to the maximum extent. Figure 2 illustrates what such pathways could look like.

## 1.3 Learner Pathways – from FET to HE

### Towards Equity of Competition for Year One Places in HE

The issue of FET to HE progression has been on the agenda to varying degrees since the early 1990s. During this period, O’Sullivan (2018) found that, in Irish government policy documents from 1996 to 2007, of all the references to certification and qualifications, the issue of access, transfer and progression, including progression from FET to HE, was the most prominent.

While ‘holders of further education qualifications’ are identified in the National Access Plan for Higher Education (DES, 2015) as an under-represented group in HE, the FET to HE issue is also about removing the system, administrative and procedural barriers to fully opening these pathways.

Currently, Higher Education Links Scheme (HELS) has two primary FET to HE pathways – a quota based system for the universities, and a points based system for the Institutes of

Technology with a maximum of 390 out of 600 CAO points applying. Not every course has accepted FE qualifications, the entry requirements are inconsistent in terms of the required academic standard, and are often accompanied by a range of specific module requirements.

In other words, the two qualifications systems of the state, the State Examinations Commission (SEC), and Quality and Qualifications Ireland (QQI), are treated demonstrably different by the Central Applications Office, a private company, which manages admissions into HE. Surely this must raise questions about the system currently in place.

The current system is complex and lacking in transparency. FET professionals find it difficult to navigate. What must it be like for students? (See Figure 3).

The Transitions Working Paper on FET to HE progression (DES, 2020) made a number of recommendations on this issue. FETCI looks forward to engaging positively with all stakeholders to bring clarity to this issue for students.

Numerically, the widening participation in HE agenda would be very difficult to achieve. Using the numbers, there are only two ways to increase the participation of under-represented groups in HE. Firstly, increase the number of places available in HE every year. This is not financially sustainable from the national exchequer perspective. Secondly, place quotas in the levels of participation of the over-represented groups, which is politically and ethically not sustainable. Therefore, the only way to actually achieve widening participation is by ensuring equity of competition for year one places in HE.

With this in mind, FETCI is of the view that there should only be one route into HE for all applicants (Figure 4). This will involve consolidating the administrative dimension of processing applications followed by the competitive dimension.

#### Administrative Dimension

QQI pathway into Year One of all courses on CAO list

Within domain progression e.g. Business to HE Business

Consistent Entry requirements – common matriculation requirements

Eliminate unnecessary specific subject requirements

#### Competitive Dimension

Single CAO points system for all HE applications

Using the NFQ as the national infrastructure for progression

CAO points equivalence for QQI grades with LC grades

Expansion of QQI grading system.

This will involve some benchmarking between the Leaving Certificate and QQI qualifications. However, any reform of the system must meet the test, inherent in the title of the national access plan – ‘Equity of Access to Higher Education’.

## 2. Support for FET Students

### 2.1 Extension of HEAR and DARE Schemes to FET Students

In line with the FET Colleges Ireland position on equity of competition for year one places in HE, FETCI is of the view that FET students should have the same access to the HEAR and DARE schemes as Leaving Certificate students as appropriate. Currently these schemes are only available to applicants to HE from post-primary schools. This is an inequitable situation.

### 2.2 SUSI Grants

PLC students can apply for the SUSI maintenance grant only and not the fees grant. While the level of fees in FET centres is not the same as in HEI's on some courses they can be considerable. There should be parity in relation to maintenance and fees grants across the further and higher education sectors.

Students in FET centres who complete degrees are not eligible for either the maintenance or the fees grants through SUSI. There is no equity of access here in relation to Further and Higher Education.

### 2.3 Continuum of Supports from Post-Primary to Tertiary Education -

When a student receives supports in post-primary, and moves from FET and then on to HE, the supports have to be applied for again. In reality, a student in receipt of supports will continue to need supports as they progress through the educational system. An additional application could be made for any additional support as required. There should be continuity between special educational needs (SEN) supports in post-primary and the Fund for Students with Disabilities in FET and HE so that the student is not tasked with completing forms, providing reports and needs assessment every time they progress.



## 2.4 Students in the Care of the State

Government policy has focused on mitigating against educational disadvantage. One such group is young people in the care of the State, who are some of the most vulnerable young people in society. They often have to make the transition from care to independence without the support from parents and wider support networks that other young people rely on.

EPIC, the national voluntary body supporting care leavers together with Munster Technological University (MTU), have announced the establishment of a university-wide initiative to support students who are care leavers. The initiative involves the appointment of staff to act as personal support advocates for care leavers to complement the existing range of student support services.

There is potential and a justifiable need for this initiative to be expanded to care leavers in both accessing and progressing through FET Schools and Colleges.

The investment of targeted supports for those in 'at risk' groups is not new and has been successful when invested in across FET centres. The ACCESS+ initiative between Cork ETB, UCC and MTU is an example of one such initiative that targets disadvantaged learners in post primary and follows the learner through to FET and HE. This initiative focuses on establishing a connection with a link person who supports the learner in transitioning between schools and colleges offering a combination of peer support, mentoring systems and financial support.

FET Colleges Ireland calls for the expansion of this model of support nationwide.

## 3. Building Capacity within FET Schools and Colleges

### 3.1 A "world-class integrated system of further education and training in Ireland" as a public good

In a modern society, where public services are often seen as something to be consumed as opposed to being a public good, the importance of an inclusive and equitable system of education is of vital importance. How the different pillars of an education system are structured and regarded within a society has profound implications for the equal distribution of education benefits amongst the citizens. In other words, education and/or skill levels are strongly linked to socio-economic prosperity of a society. Busemeyer (2015) states

“...variations in the institutional setup of the education and training systems do have enormous consequences for the distribution of skills, income, and wealth in the political economy at large” (p.2, emphasis in the original).

Fleming (2018) observes that

“Many adults have been ‘locked out’ of opportunities by their previous schooling, life experiences and continuing financial barriers. Disability and literacy difficulties also exclude many from the twin desires of education and work” (p.1).

Indeed, by comparison with the 1980s, Collins (2014) states that

“...education levels in the overall population are significantly higher than [in the 1980s]. This means that...those today with lower levels of educational attainment may well be more disadvantaged now relative to the population as a whole than would have been the case in the 1980s”. (p. xi).

In the last Census, for example, the unemployment rate amongst people with a disability was over twice that for the population as a whole.

The OECD (2017) described the change in the skill profile of its member countries over a 20-year period and found that in the Irish labour market, the gap between low-skill and high-skill is not only widening but is becoming increasingly difficult to cross. So, why is a world-class FET system so important? Busemeyer (2015) put it best when he states

“Levels of socio-economic inequality are significantly lower in countries with well-established VET systems, since VET opens up access to well-paid and secure employment for those in the lower half of the skills distribution” (p. 254)

It is no accident that one of the strategic goals in the first FET Strategy was Active Inclusion, namely the inclusion of people excluded from the labour market. It is a matter of a public good, and indeed, in the national interest, that our FET system is world class.

Currently, the network of FET Colleges is geographically dispersed across the country, and based firmly within their communities. These Colleges are ideally placed to be a central part of the new integrated FET system in Ireland. FETCI is strongly of the view that the current network

of FET Colleges, as part of the new FET Colleges of the Future, can be leveraged to become even greater beacons in their communities than they already are

### 3.2 Universal Design approach to the development of the new FET sector

In seeking to arrive at a vision for the FET System of the Future, it would be important to situate this new entity within the macro-, meso-, and micro-levels of this landscape. Government departments (DES, DEASP, and DBEI) and the executive agencies (HEA, SOLAS, and QQI), for example, populate the macro-level. The meso-level consists primarily of the ETBs and the higher education institutions (HEI), with the FET Colleges being located at the micro-level. Change at one level will necessitate corresponding change at the other levels.

As the new FET landscape is emerging, FETCI is of the view that a Universal Design (UD) approach to the design of the new FET system, within the nascent unified tertiary education sector, would be optimal. Universal Design and Universal Design for Learning (UDL) approaches focus on the interaction between person and environment (physical, social, technological and social) and represent the highest expression of person-centred planning philosophy (Bencini, Garofolo, and Arengi, 2018). Indeed, the National Planning Framework for Project Ireland 2040 (Government of Ireland, 2018), has highlighted the need for a universally designed approach:

“Planning affords an opportunity to facilitate and deliver a more socially inclusive society through the integration and greater accessibility at all stages of the life cycle. Housing, education, health and transport are four key areas where social inclusion can be improved...through universal design...to deliver greater accessibility for all...” (p. 84).

This increasing diversity of learning venue, as discussed in Section 3, combined with the diversity of sectors of the economy, and size of companies, presents a highly set of complex external environments in which the FET Colleges must engage. The external environment also includes the higher education sector and the local INTREO offices. FETCI strongly supports the commitment in the FET Strategy (SOLAS, 2020) to adopt:

“...a universal design for learning (UDL) approach in shaping its future provision” (p.45).

### 3.3 Unified Student Supports Structure

Just as the range of environments is complex, so too is the diversity of students accessing FET programmes. Placing the diversity of students and their complex range of vulnerabilities in the mainstream of FET provision, rather than as a “reasonable accommodation” after the fact, is of

great importance to FETCI. In particular, mainstreaming a student support infrastructure, which appropriately reflects this diversity, is crucial for a FET College's capacity to meet the needs of all students. In particular, any new funding model for FET should include an allocation for student supports. For example, if a full-time equivalent (FTE) funding model was to be used, then a multiplier of, say, 1.2 per FTE could be appropriate, where 0.2 is the initial student support allocation. This would mean that funding is available for student supports from the first day of the course rather than the multi-week delay that is currently the case. Any additional funding can be sought after the course has commenced.

### 3.4 Establish Access Offices and Services for FET Colleges

As we continue to move towards an integrated tertiary education sector, the managerial, reporting, and governance requirements within the FET sector have come into line with those of HE institutions. However, increasing the administrative and specialist capacity with FET Schools and Colleges has not matched the increased demands. The Consultation Paper (DFHERIS, 2021) makes reference to engaging with "Access Offices and Staff in each higher education institution" (p. 3). The Review of the Fund from Students with Disabilities (HEA, 2017) that 23% of the funding allocated by the Fund for Students with Disabilities for the period 2012/2013 to 2015/2016 went to FET. FET Schools and Colleges, as they continue to operate within a post-primary governance model, have no such Access Offices or services to offer students. FET Colleges Ireland calls for the provision of Access Offices and services, with appropriately qualified staff, to FET Schools and Colleges as a matter of urgency.

### 3.5 Digital Transformation of FET – IT Support Services for FET Staff and Students

The Digital Transformation of FET consists of two broad elements – the enhancement of teaching and learning (including the teaching of digital skills), and the management and corporate governance of the FET system. Just as fragmentation has been a persistent feature of FET programmes, so too has it been synonymous with the siloed funding and reporting systems. In consolidating and rationalising FET provision into a single unified system, there is a clear opportunity to include the digitisation of the funding and reporting dimensions.

In keeping with Action 1 of the Government's public service reform plan Our Public Service 2020 ([www.ops2020.gov.ie](http://www.ops2020.gov.ie)) – Accelerate digital delivery of services, FETCI is of the view that there is an opportunity to explore the digital transformation of the systems supporting the learner's journey through FET. From accessing information about courses, to making an application, seeking any supports required, IT services, and certification, an integrated Management Learning Environment (MLE) should be a goal of this strategic objective.

In our submission to the public consultation on the National Resilience and Recovery Plan (FETCI, 2021), the Committee highlighted the importance of the digital dimension of the entire

FET sector's response to the impact of COVID-19 on our learners. The submission also emphasised that in implementing this response, some gaps were identified.

The impact of the Covid-19 pandemic, and in particular, the resultant sudden shift to online learning, highlighted the issue of digital exclusion for many vulnerable groups in society. While there has been considerable resources made available to mitigate these difficulties, such as the availability of digital devices, e.g. laptops and tablets, the supporting of these new platforms in a learning environment has been highlighted as an area requiring addition investment.

The impact of the first Technology Enhanced Learning (TEL) Strategy (SOLAS, 2016) was evident even from the early days of the COVID-19 restrictions. Indeed, the appointment of TEL Coordinator in each ETB was particularly timely as the impact of the pandemic took hold. While these initiatives, along with the provision of the devices were positive first steps, the absence of educational technology and IT support, for both the teachers and the learners in FET, as is available in higher education, proved a significant obstacle to be addressed as part of the learning process. This resulted in teachers having to engage, as best as they could, in assisting students with technology issues, often during class-time, thereby reducing the time available for teaching and learning. Since the onset of the Covid-19 restrictions, and the move to online teaching and learning, teachers, tutors, and instructors have engaged in considerable reskilling and upskilling programmes to ensure that their skills in the area of online education and training were brought up to the required standard. This is a new pool of skills to be built upon.

Equally, since the lockdown in March 2020, the vast majority of society have become far more familiar with online activities, albeit education, shopping, or meetings. This new reality makes the design and support of online programmes an area for immediate development in the coming years.

To this end, this submission is proposing the establishment, in each Education and Training Board (ETB), of a specialist Technology Enhanced Learning (TEL) Support Unit, and an IT Support Services Unit, to support the significant increase in online learning. This increase in online learning is expected to continue as a significant element of provision into the future. Within each ETB, this Unit would facilitate the development of digital learning content and resources for a digital repository. The repository could be built up over time through contributions from all such units in the 16 ETBs. This content would be held under the Open Education Resource and, through the open licencing and creative commons licencing protocols, would be available, nationally, to the entire FET sector.

## Conclusion

This submission represents the current thinking of the FET Colleges Ireland Committee. As a Committee of NAPD, FET Colleges Ireland is committed to working with the department and its

executive agencies in seeking positive resolution to any issues. We continue to be available for discussions, and to contribute constructively to the continued development of the FET Sector in Ireland.