



Statement of Strategy 2016-2018

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The National Association of Principals and Deputy Principals (NAPD) is the professional association for all Principals and Deputy Principals in Post Primary schools and Further Education colleges in Ireland. NAPD-FE also represents Principals and Deputies from the different managerial bodies that operate FE schools and colleges in Ireland (such as ETB's, JMB and ACCS). This committee has been operational for 14 years and has represented NAPD on many national working groups and committees involved in FET. In addition a representative of this committee is a member of the NAPD National Executive and works with the NAPD in addressing FET issues as they affect Principal's 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 (Standards Based Construction Trades)
- PLC Programme
- Traineeships
- SkillsVec
- Momentum
- BTEI
- PLC Programme
- VTOS
- Adult Education – part-time night provision

NAPD-FE schools and colleges have been catering for the following types 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 retaining
- Those seeking employment
- Part-time Night
- Graduates
- International students
- Those who do not thrive in HE and revert to FE
- Mature learners
- Early retirees who are seeking a career change
- Those seeking a change of career

There has been substantial change to Ireland's educational landscape at a strategic FET level since 2012. Recent legalisation such as the Quality and Qualifications Act 2012, Education and Training Boards Act 2013 and the Further Education and Training Act 2013 have all impacted on FET providers including those affiliated to NAPD. In addition the NAPD-FE committee has responded to Governmental reform agendas as they relate to labour force activation measures, in particular back to work initiatives such as "Action Plan for Jobs" and JobsPath". The recently launched National Skills Strategy 2016 also sets out clearly defined targets for the FET sector. NAPD-FE is also aware that the EU Agenda (in particular the ESF PEIL 2014/2020 programme) in striving for excellence in VET and is also a guiding force behind strategy development and implementation.

NAPD-FE acknowledges the necessary development of strategic policy in the FET sector as good practice. However strategies developed by key educational stakeholders (SOLAS, DES, HEA, QQI, IOTI etc) and inter-governmental departments (DSP, DJEI and DPER) have led to a disconnect between the competing priorities of "work first" and "skills for the economy". This creates confusion on the ground amongst students, guidance counsellors, stakeholders and the public as to the value of a FET qualification. In addition the key educational stakeholders and inter-governmental departments have overlooked the funding and operational difficulties faced on the ground by NAPD-FE schools and colleges in striving to meet these competing priorities.

This submission sets out to illustrate ways in which the DES can address the issues within FET to establish a recognisable brand and to assist in getting Ireland's economy moving again.

The NAPD-FE committee is willing to meet directly with the Minister to discuss any aspect of this consultation document.

<p>1. How well does the Education Service meet the needs of children and students? What improvements can be made for</p>

- a. within existing resources
- or
- b. through new provision

(1) Currently the FET sector is being framed and developed through the strategic and implementation plans of QQI, SOLAS, DES and DPER. NAPD-FE schools and colleges welcome the creation of SOLAS and the legislative recognition that FET has received. While these developments are still in their infancy there is a lot of confusion amongst the public as to what services are being offered, where to get them and what the final outcome for students will be. DES is the department responsible for the different agencies that drive FET, but there seems to be no cohesion between policy making and strategic planning between these agencies. For example QQI recently published its new QA guidelines. While these are good practice and strive to build a world class QA system in FET, these guidelines are based on a Higher Institutional Model. The FET sector is under resourced and does not have the capacity to deliver a Higher Institutional based QA model. While there are QA development officers within ETB Head Offices

- (a) There are no resources on the ground within NAPD-FE schools and colleges
- (b) There is no provision for upskilling and training teachers in current best practice in QA
- (c) There is no QA monitoring of the standard other than through External Authentication
- (d) There is no provision to assess teacher performance other than the inspectorate who have not inspected NAPD-FE schools and colleges.

(2) The merger of Further Education with Training through the Education and Training Boards Act 2013 has not addressed legacy issues such as the teacher contract under Memo V7 and other grades, who teach, train or educate.

(3) Existing services are not designed to currently meet the needs of the FET student. The current funding and operational models within an NAPD-FE school or college are based on the second level model and which is not resourced sufficiently to deliver a professional FET service to our students in order to give them local, regional, national or global skills.

(3.1) Funding: Funding models are based on the post-primary model of counting each student as a full-time student. NAPD-FE schools and colleges are required to make September Returns and each student must be counted as a full-time student. This return then affects teacher allocation year on year depending on numbers and funding as it's calculated per capita. In addition at least 50% of all FE students are exempt from the €200 PLC Government Levy. The remaining 50% of learners must pay the €200 levy while SOLAS only funds back €167. Budgets have been cut successively since 2007 and are now back at 2001 figures unable to match the rate of inflation.

(3.2) There is no provision to count part-time students towards numbers for funding and teacher allocation therefore this eliminates any flexibility during the day from the system. In addition the provision at night time has to be self-financing and due to the recent economic crisis this provision has been eroded. This means that those learners who are willing to return to gain a qualification whether they are working or not cannot return to an NAPD-FE school or college. This has the two fold effect of creating a barrier to entry for those in society who have to care for family members etc and discourages employers from sending their employees to be educated for one day a week to gain a formal qualification as NAPD-FE schools or colleges cannot accept them due to the lack of a suitable funding and operational model.

(3.3) There is no capital budget or summer works funding scheme for NAPD-FE schools and colleges. Unless a capital budget is put in place buildings will become either a fire or health and safety hazard and equipment which could be retrofitted will go to waste.

(3.4) Funding and Operational: All FE teachers must be registered with the teaching council in order to be paid from Oireachtas funds. This stifles the flexibility of the sector as NAPD-FE schools and colleges cannot hire industry experts to deliver these skills as they are not teaching council registered. The reality is that an IT expert is not going to work full-time within the educational system as they can earn a better income in the private sector, however some experts are willing to engage in teaching or training for a small number of hours a week and due to the teaching council requirement NAPD-FE schools and colleges cannot avail of this expertise. Circular Letter 0052/2013 identifies a limited number of cases whereby NAPD-FE schools and colleges can hire tutors at a different rate. While representations can be made to the DES to hire additional tutors in other skilled areas an economic case must be put together and this takes approximately 6 months which reduces flexibility. There are no such restrictions applied to the other grades within the FET sector who incidentally offer the same awards to the same level as NAPD-FE teachers.

(3.5) Operational: The current teacher contract reduces flexibility within the system as the FE teacher has the same terms and conditions as the post-primary teachers whereby they teach only 167 days of the year. The reality is much different on the ground as traditionally NAPD-FE schools and colleges commence teaching in mid-September to allow those who did not get a CAO place to apply for the PLC programme. There is also a lot of teaching time lost during the academic year in order to facilitate the necessary work experience etc which is a mandatory requirement of all QQI Level 5 Awards and some Level 6 Awards. In addition teaching ceases around the 2nd or 3rd week in April to allow the formal assessment cycle to commence for QQI awards. This assessment cycle involves the setting, hosting and correction of examinations, internal verification and external authentication of results and the holding of results approval panel meetings. All of which must be completed with no additional resources and before the teacher contract ceases for the academic year usually at the end of May. This has to be completed as teachers commence holidays or SEC exam supervision and SEC correction and are generally unavailable. In addition NAPD-FE schools and colleges need to provide learners with adequate time to appeals results so that learners can meet the first round of CAO offers. This leads to the complete erosion of the school year.

(3.6) Operation: The current Post of Responsibilities scheme (POR) within FE cannot meet the changing demands of the sector as this scheme is over 20 years old and has not been revisited other than in relation to the assignment and interviewing of posts. The scheme has not kept pace with the changing demands of the current FET sector. While it can be argued that the Principal can negotiate with the post holder duties there are limits. For example how can a POR engage with employers when they are constrained by a teaching timetable? Another example relates to the teaching year for POR's which traditionally finishes at the end of May in each academic year. POR's do not complete duties over the summer months. This is an emerging problem within the FET sector where audits, recording, consultations and reporting deadlines are frequently being set for the summer months and this conflicts with the traditional planning and development time of the Principal and Deputy Principal. In fact the operation of an FET centre has become a 365 yearly operation as opposed to the traditionally secondary school academic calendar year.

(3.7) Operation: Guidance provision is within the teaching allocation and as a result has been eroded within NAPD-FE schools and colleges. In addition a large number of students present with mental health and learning issues. There is no support for them within the current operational model.

These are just some examples of where the current system is failing to meet the needs of the FET student, there are many more

What improvements can be made within existing resources?

None. NAPD-FE schools and colleges are struggling to cope with new practices and new ways of working as it is. All improvements that can be made have been made. NAPD-FE schools and colleges are subjected to the employee control framework due to the embargo on recruitment and the moratorium on promotion. Existing resources are stretched to the limit as administration staff and POR's have not been replaced, but the volume of new work continues to arrive on the Principals desk. For example FARR, PLSS, P-POD, FETCH, planning for the FET Services Plan etc all have to be managed with no additional or new resources. This has taken the Principal and Deputy away from their core role of leading teaching and learning and places them in a high end administrative role that is overburdened by public administration, corporate governance and audits.

Through new Provision?

If the DES are serious about delivering a world class FET system then consideration must be given to support Principals and Deputies in dealing with new reporting and recording tools. DES needs to work with NAPD-FE schools and colleges and assist them in getting the basics right first. The volume of duplication and form filling, compounded by new QQI regulations as they relate to new course proposals and course validation, have made the challenge of creating new provision very difficult. The absence of capital funding to support new provision is another stumbling block. For example an NAPD-FE school or college interested in providing new career traineeships in hospitality within an ETB that has no such provision have no source of capital funds for this investment. This results in the stifling of new provision ideas etc.

2. Comment on work currently being undertaken by the Department in your area of interest and/or expertise. (What are we doing well, what could we do better)?

The formation of SOLAS in 2013 firmly placed FET as the fourth pillar within the Irish Educational System. However successive government publications do not refer to FET or recognise or make reference to FET. For example in this "Programme for a Partnership Government May 2016" there is no reference to FET at all under the 8 consultation areas. What is described for development are the existing three pillars primary, post-primary and higher education and what is outlined is that an additional €500m will be made available to assist the three pillars in 8 consultation areas listed. This is very disappointing for NAPD-FE schools and colleges, who have worked hard to gain a well-deserved reputation and who have contributed to the workforce and who provide 20% of the intake to Third Level yearly.

A few examples of where the existing three pillars are referenced at the expense of the FET sector are listed below.

- (1) Page 86 outlines how the Government is committed to equipping young people with the skills for the economy and developing human capital and makes no reference to FET. There are large numbers of under 25's who would benefit from a FET course in particular those from DEIS schools who would benefit from a relevant PLC Programme.

- (2) Page 90 outlines a “Digital Strategy” and “Continuous Professional Development” for teachers without referencing the work currently being undertaken by SOLAS in surveying FET teachers and recently published FET Technology Enhanced Learning Strategy. All CPD to date within NAPD-FE schools and colleges has been self-driven and paid from school budgets with the exception of the very valuable, but limited, CPD provided by FESS. Technology developments to date within NAPD-FE schools and colleges have been driven by interested and innovative teachers who would welcome resource investment in this area. SOLAS recently broadened out eCollege provision to FET teachers and tutors and this is a welcome initiative and needs to be supported. Compare this to the CPD provision in place for the new Junior Certificate which is based on a continuous assessment model not too dissimilar to the FET model at present. The question needs to be raised as to why the CPD needs of FET teachers have not been addressed nationally when the CPD needs of the Junior Cycle teachers have vast resources supporting the delivery of new ways of teaching and assessment?
- (3) Page 91 outlines how “Creativity and Entrepreneurial Capacity” will be developed at Junior Cert, Leaving Cert and Higher Educational Level. Yes entrepreneurial creativity is a key goal of both SOLAS and the DES and outlined in the National Skills Strategy 2016 as a key driver of economic recovery in Ireland. Entrepreneurship is essential and has a place on FET courses, however the DES needs to be aware that the current QQI awards structure coupled with progression requirement from HEI’s limits the occurrences of entrepreneurship or start your own business components on a FET course. Also the perception that completing an entrepreneurial component in leaving certificate and at higher education will only create Ireland’s entrepreneur of the future is a false one. What about those who develop through the FET sector? Again the funding and operational models need to be revisited to provide mentoring, incubation and facilities for start-up business. As mentioned already all NAPD-FE schools and colleges facilities are mainly vacant during May, June, July and August due to the assessment model currently in place and the current teaching contract. Why can’t these facilities be used to foster entrepreneurial activity within the FET sector?
- (4) Page 92 outlines a “Capital Investment Project” to develop school buildings at primary and post-primary level. Yet NAPD-FE schools and colleges are officially listed as post-primary schools and colleges and cannot avail of capital investment Projects. Currently there is no capital investment project for NAPD-FE schools and colleges at all from any of the funding agencies. This means that since 2007 NAPD-FE schools and colleges have not replaced equipment or modernised facilities. The reality is that on the ground NAPD-FE schools and colleges are spending main scheme budgets on new roofs and construction projects which are the remit of the DES. How can NAPD-FE schools and colleges support the National Skills Strategy in the delivery of 50,000 new apprenticeships and traineeships by 2020 if there is no capital investment?
- (5) Page 93 outlines how the new “Skills Architecture will meet the skills needs of the future”. This new Skills Architecture involving the Regional Skills Fora, the National Skills Council, the work of the EGFSN and employer engagement is a welcome development for NAPD-FE schools and colleges. However there are no resources on the ground within centres to work with the Regional Skills Co-ordinators even at a local level in assisting with employer needs. Under new QQI QA guidelines the provider is tasked with the role of ensuring that the employer input meets a quality standard NAPD-FE schools and colleges cannot assist as the teaching contract or the POR scheme does not allow for this flexibility.

- (6) Page 94 highlights how “financial incentives for third level will be created to respond to skills gaps” all without mentioning any opportunities for FET centres in this regard.

Until the DES are serious about developing a FET sector that is properly resourced and acknowledged then the work of SOLAS, ETB's and NAPD-FE schools and colleges is limited to existing resources which are over stretched and not properly resourced to deliver a world class professional FET service.

The DES needs to:

- (1) Take FET out of second level and make it a recognised pillar in its own right. Currently NAPD-FE schools and colleges are reporting to the DES, SOLAS, HEA and many other stakeholders' similar reports with similar data requirements.
- (2) Listen to the knowledge and experience of the NAPD-FE committee and create a system of delivery that is fit for purpose and change Teaching Council Regulations.
- (3) Address the issue of the teaching contract and introduce flexibility into the system. Remove the emphasis on the teaching contract being central to FET provision.
- (4) Adequately resource the sector by providing back office administration staff with an academic background to deal with the new QA and reporting demands.
- (5) Investigate how PLC schools and colleges are currently completing at least 11 different databases (in most cases through manual typing where there is a large margin of error and a waste of valuable resources in duplication of work) and why in 2016 IT systems cannot talk to each other. For example P-POD, FARR, PLSS, FETCH, DCS, MIT, VSWare, SalePulse, PLC Returns (manual spreadsheet), electronic attendance system (for insurance, DSP and grant returns) QBS to name but a few. This results in no cohesive database and poor qualitative data as none of these systems integrate and data can only be duplicated through manual typing.
- (6) Support the Principal and Deputy in their role within education i.e. leading and managing teaching and learning as opposed to completing high end administrative work. The DES needs to separate the teaching and learning role from the newly evolved public administration/corporate governance/audit driven role which it has become.
- (7) Provide a capital budget so that FET schools and colleges can develop and put in resources that meet current employer needs. In order to deliver on Technology Enhanced Learning and Digital strategies NAPD-FE schools and colleges need the IT infrastructure.
- (8) Provide proper IT supports such as a dedicated IT technician to deal with IT issues on the ground. It is not sufficient to leave it up to a POR holder to fix machines, printers, server problems while at the same time teaching a full teaching timetable.
- (9) Deliver more guidance resources into the system whereby supports can be given to those learners who need it.
- (10) Create an automatic HEA Disability Fund “passport” for those learners who have lifelong learning and health difficulties such as acquired brain injury or blindness so that they do not have to reapply for supports within the FET sector. NAPD-FE schools and colleges need access officers and the HEAR and DARE schemes should be broadened into FET and should not just be available for Higher Education.

- (11) Currently only students on the PLC programme can apply for funding through the HEA Disability Fund thus excluding VTOS, BTEI and night students. This is a form of exclusion and in leading to lack of diversity and dealing with properly with learners with special needs.
- (12) Training centres have Industry liaison officers or service to business managers. How can FE schools and colleges engage with local employers when teachers are tied up teaching a timetable?
- (13) Introduce proper guidance and learning supports into FET. The DES is to be commended on its work on prioritising early year's education, however there is a large cohort of the population who have missed out on these early interventions and learning supports and who present to FET. There are no resources on the ground to deal with these issues and the FET course becomes difficult and the student drops out as a result. The DES needs to focus on putting adequate supports in place in order to improve retention rates.
- (14) Currently the PLC Programme does not sit on the Internationalisation Register whereas courses being offered by IOT's and Universities at level 6 do. This creates barriers to entry for those who are disadvantaged including asylum seekers and international refugees.
- (15) Currently the NFQ have two Level 6 awards one more advanced than the other. This difference needs to be removed as it is causing confusion within the sector.
- (16) QQI awards are currently restrictive. In order to create a new award it will take approximately 1 to 2 years to complete a QA and validation process. While NAPD-FE schools and colleges recognise the importance of quality provision with the proper resources this is too long in order to develop a full award. This has stifled responsiveness, innovation and development in the sector.
- (17) The DES needs to work with ETB's in order to elimination duplication of courses and retrain teachers into new areas. Currently the teacher contract dictates the teaching timetable. Duplication leads to an underutilisation of scarce resources and too much choice in the system. NAPD-FE school and colleges are aware of courses being run to under capacity within centres mainly because the teachers need to complete teaching duty. This needs to be addressed.
- (18) Currently NAPD-FE schools and colleges encourage students to progress to HE. At least 20% of all intake in HE is through the Higher Education Links Scheme which awards points to QQI Level 5 Awards only. These points are capped at 400 CAO points and places are limited on HE degree programmes. In addition the CAO entry from Level 6 courses is not recognised other than if an Advanced Entry link is created between individual NAPD-FE schools and colleges. This has the knock on effect of further alienating disadvantaged students from the HE system

3. Are there opportunities (e.g. new areas of work) which the Department should consider when developing the 2016 - 2018 strategy which would advance the achievement of our mission, vision and objectives across the continuum of education and skills?

The DES should focus attention on the structure of the FET sector over the next two years and look to getting this fully functioning first. This will only work if the DES is willing to take on board and consider the major points made in 2 above and formally recognised the sector and sets out to publicly reference and develop this sector.

DES has overarching responsibility for the different agencies under its remit and the formal establishment of the FET sector as the fourth educational pillar will assist the different agencies in meeting their strategies i.e. SOLAS and QQI. The Higher Education sector is already in place; make the public want to send their sons and daughters to FET by supporting FET as outlined in 2 above.

Revisit the 8 educational consultation areas in this Programme for Partnership in Government and include FET.

4. How should success on achieving our strategies be measured.

Success can be measured through

- PLSS, increased provision through changing inputs and outputs
- Students, by directly surveying them
- Change in public perception to FET by formally recognising FET formally which will create confidence in the sector and guidance counsellors and parents will encourage FET courses
- Numbers of employers who are engaging in new apprenticeships, traineeships or short courses
- Analysis of the number of students who progress through the CAO from FET to HE
- Data analytics. Currently there are a mirage of data systems that do not talk to each other this needs to be addressed.

Revisit the 8 educational consultation areas in this Programme for Partnership in Government and include FET.

5. Comment on any issues relating to the continuum of education and skills, in addition to your particular area of interest and/or expertise

Refer to question 3 above. Until the DES addresses the shortcomings of the FET sector and actively talk about FET as a real option for education, career and employment, then the continuum of provision will not exist and the FET sector will not develop into a world class sector as outlined in the SOLAS FET Strategy 2014-2017 which was approved by the DES.

6. Any other observations that you would suggest the Department should consider in the formulation of our strategy for education and skills 2016 - 2018

- Support FET as a recognised pillar within the Irish educational system and as a valid option for students in Ireland in order to progress their career and employability.
- Engage with the teacher unions and once and for all deal with the issues of the teacher contract within FET. Accept legacy contracts and seek to create a new teacher/tutor contract that creates parity and allows the sector to grow.
- Remove the barriers to entry through the Teaching Council Act 2013.
- Revisit the 8 educational consultation areas in this Programme for Partnership in Government and include FET.

A Programme for a Partnership Government - Chapter 10: Education

1. Prioritising Early Years

(a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account).

The approach outlined is welcomed and workable. However the DES should note that there is a large cohort of students who have not benefitted from early educational intervention and these are presenting for FET courses. In addition there is a large cohort of FET students presenting with mental health issues such as depression and consideration should be given for their development and welfare. The DES should consider a similar programme at FET level whereby NEPS psychologists can support the development of the FET student.

Numeracy and literacy strategies at primary and post-primary level should be expanded to include FET. Ireland is behind the European average in relation to the numbers who seek to address career and education through lifelong learning (currently only 7.3% compare to the EU average of 10.5%). There is now an ideal opportunity now for the DES to target those students who have not benefited from early educational intervention.

(b) How should progress on Prioritising Early Years be measured?

Through a study that will follow pupils achievement from primary to post-primary to FET or HE. Students presenting to FET courses in September could also be surveyed in relation to their experiences at primary and post-primary.

(c) What would you consider to be the priority actions and outcomes in this area?

DES needs to address the difference in language that is used by educational psychologists in preparing educational reports. "Mild Dyslexia" and "could benefit for learning supports" are vague and do not define what level of learning difficulty exists and what exact supports are needed. This is causing confusion as the student progresses through the system where parents interpreting these phrases as students being entitled to supports. This is very prevalent in the students now presenting to NAPD-FE schools and colleges demanding the same supports they received in primary and post-primary.

The DES should also consider closely the granting of an Irish exemption due to the results of the educational report. Granting Irish exemptions leads to erosion in the Irish language and also leads to the view that languages do not count. Currently FET provision in languages is very minimal and yet successive skills report pin-point languages as a skills need in the economy. Languages such as French, Spanish or German should be fostered in primary school and continued up through the 4 pillars.

Revisit this consultation area and include FET provision

2. Tackling Disadvantage

(a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account).

Disadvantaged students need to access education and training through familiar safe routes. NAPD-FE schools and colleges are ideally placed to assist disadvantaged learners as they are embedded within ETB's as recognisable hubs of educational provision. NAPD-FE schools and colleges have a reputation for approachability and helping students to access courses that suit their needs, wants and previous experiences. Consideration should be given to creating community hubs in NAPD-FE schools and colleges where learners can progress up to Level 6 in a safe and comfortable environment.

This document focuses on early school leavers and giving them additional supports to stay in post-primary education. Particular reference has been made to DEIS schools. NAPD-FE schools and colleges should be used as a continuum to tackle unemployment in under 25's and to support students who come through a DEIS environment as class sizes are small (max 24 in a practical room and 30 in a theoretical room) and there is plenty of vocational courses to choose from.

Students attending the community training centres, youthreach and sportsreach should be particularly targeted to encourage them to stay within the educational system and to attend a FET course.

The idea of providing flexible learning opportunities and weekend provision is good and consistent with European practice however the DES need to address the issue of the teaching contract in order for the facilities in NAPD-FE schools and colleges to be used.

Specifically target those completing a lower Level awards such as a Level 4 award into committing to a higher Level award Level 5 award by making the offering attractive i.e. part-time etc with additional learning supports.

Finance is a barrier to the disadvantaged. Students who are deemed disadvantaged need to be supported financially in order to allow them complete a course of study.

Currently there is a mirage of different courses and different funding streams which are difficult to understand and navigate. This needs to be addressed and a simple system put in place. For example VTOS and BTEI programmes are very similar in relation to funding, but have vastly different eligibility criteria. Consider one funding stream for these two programmes. DSP qualification rules change on a regular basis and while no NAPD-FE school or college would advise a student as to what type of support they are entitled to students present confused with the system.

DSP referrals to NAPD-FE schools and colleges are impeded by the regulation that students who have completed a Level 5 or Level 6 award are not eligible for FET even though there is no third level award available in their chosen field i.e. beauty, hairdressing etc.

Broaden out the HEAR and DARE schemes to FET in order to attract more participants so that students are better able to prepare themselves for progression to HE's and better able to complete the degree, thus increasing retention rates at HE.

Focus on developing guidance counsellor's knowledge of the FET sector.

(b) How should progress on Tackling Disadvantage be measured?

Through the PLSS and DSP.

(c) What would you consider to be the priority actions and outcomes in this area?

Put the proper psychological, learning, guidance and financial supports in place for the FET learner.

Revisit this consultation area and include FET provision

3. Diversity and Choice for Parents

(a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account).

NAPD-FE schools and colleges recognise that this section of the document sets out a vision for primary and post-primary school patronage, however the DES needs to consider the standing of FET within the community in particular the image of FET as a valid career choice for those advising students of all ages.

The branding of FET as a real choice for career, employment and education needs to be supported by the DES. Students should want to come to FET courses and not be limited by choice through the perception that a HE degree is the only valid career, employment or education option.

(b) How should progress on Diversity and Choice for Parents be measured?

This can be measured through increased enrolment numbers on apprenticeships, traineeships, PLC and FET courses.

(c) What would you consider to be the priority actions and outcomes in this area?

Revisit this consultation area and include FET provision

4. Promoting Excellence and Innovation in Schools

(a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account).

Revisit this area and include excellence and innovation in FET schools and colleges.

For example One of the NAPD-FE schools and colleges is involved in the iTunesU project and has created online resources for Animal Care Level 6 and Nursing Studies Level 5 QQI Awards. The participating secondary schools receive resources yet this FET centre has received none to operate this project.

For example One of the NAPD-FE schools and colleges is involved in apprentice provision. Two of its apprentice teachers are World Skills Experts and have trained apprentices to participate and represent Ireland at World Skills Level (most recently in 2015 in Brazil). There was no provision in the current FET system to hire in a substitute teacher to alleviate this training.

For example One of the NAPD-FE schools and colleges frequently has past students winning Oscar's and media awards, where is this celebrated within FET?

Champions of FET need to be recognised.

The young scientist competition is opened to post-primary schools only. This is an example of a competition which promotes excellence and innovation; similar competitions should be in place for the FET sector.

NAPD-FE schools and colleges cannot offer greater subject choice as the curriculum provision is based on the existing skills set of teachers who have permanent or CID contracts. In addition the Teaching Council requirement places a restriction on the types of innovative subjects that can be delivered within NAPD-FE schools and colleges.

NAPD-FE schools and colleges should not be excluded from an “increased flexibility in the day to day management of schools in order to improve outcomes”. Why should NAPD-FE schools and colleges be excluded from receiving “capitation rates to schools on a rolling 3-year basis, allowing for forward planning” when they are rated as post-primary schools with a post-primary number?

NAPD-FE schools and colleges need an investment as part of a FET Digital Strategy in order to enhance teaching and learning at this level.

(b) How should progress on Promoting Excellence and Innovation in Schools be measured?

This will only be measured through the satisfaction rates of students who receive the benefits of the planned changes as outlined above.

(c) What would you consider to be the priority actions and outcomes in this area?

Revisit this consultation area and include FET provision.

5. Promoting Creativity and Entrepreneurial Capacity in Students

(a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account).

NAPD-FE schools and colleges thrive on creativity and entrepreneurial educational activity in creating new courses

Currently the introduction of entrepreneurial components to QQI awards at Level 5 and Level 6 are restricted by the awards structure. The DES should review the awards and seek to investigate how difficult it is to add in an entrepreneurial component within the award structure while also taking into account the subject entry requirements from HEI's when students plan to progress their education.

The introduction of entrepreneurial capacity building is also limited by the subjects that teachers can teach within the system. The recruitment of teachers with an entrepreneurial background is limited by teaching council requirement. While existing FE teachers can deliver core components and soft skills the specialist skills need to be delivered by the expert. NAPD-FE schools and colleges would welcome a lifting of the teaching council restrictions in order to hire entrepreneurs, even for a small number of hours per week, to share their experiences with students and to foster this activity.

This section identifies that there will be a focus on “mental health awareness” within post-primary level but there are many students who present at FET level with mental health difficulties and there are no resources in place to assist them in building a knowledge around mental issues or supporting them through their difficulties.

There is also a recognised skills shortage in the STEM profession. There is confusion within the sector in relation to the Maths for STEM QQI component which is placed on the same level as Maths for Computing and General Maths. In fact there is confusion amongst HEI's as to what constitutes a STEM qualification for eligibility for progression. This dilutes the creativity around different awards. In addition there are no capital resources available to upgrade current facilities or provide new facilities to offer STEM courses at FET level.

The DES should consider offering students at post-primary level the choice to complete with Transition Year or a PLC Programme.

This section identifies that entrepreneurial activity will be benchmarked in the Irish higher Education system; there is no reference to benchmarking this activity at FET level. In order to be realistic about entrepreneurial activity and creativity it has to be fostered across all the four pillars not just two as outlined in this section.

Currently the resources in NAPD-FE schools and colleges are underutilised between May and August of every academic year. The DES should consider setting up an incubation and mentoring programme for FET students during this time to use the facilities to develop capacity.

(b) How should progress on Promoting Creativity and Entrepreneurial Capacity in Students be measured?

Through the number of student taking up entrepreneurial components or awards.

(c) What would you consider to be the priority actions and outcomes in this area?

Revisit this consultation area and include FET provision

6. Making Better use of Educational Assets within Communities

(a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account).

There is no commitment for a FET capital budget or FET capital investment in this document. Currently many of the NAPD-FE schools and colleges operate courses out of prefabs and modular buildings. In addition high end equipment such as CNC Routers and production cameras are outdated and need to be either replaced or retrofitted.

NAPD-FE schools and colleges are available to be utilised out of hours, but the funding and operational models needs to be addressed.

Even though NAPD-FE schools and colleges have post-primary recognition they are prohibited from benefiting from the summer works schemes.

(b) How should progress on Making Better use of Educational Assets within Communities be measured?

NAPD-FE schools and colleges should benefit from capital investment where facilities can be used by the different FET groups within the community.

(c) What would you consider to be the priority actions and outcomes in this area?

Revisit this consultation area and include FET provision.

Provide a capital budget and allow NAPD-FE schools and colleges to benefit from summer works schemes

7. Special Needs Education

(a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account).

Currently NAPD-FE schools and colleges are availing of the HEA Fund for learners with Difficulties in order to support their educational journey through the PLC Programme only. Apprentices, VTOS and BETI students cannot avail of the supports. While NAPD-FE schools and colleges are appreciative and depend heavily on this resource it is limited and there are large numbers of students who have to compete for an award without resources.

In order for students at FET level to avail of learning support and examinations accommodations a current up to date psychological or medical assessment is needed. While this is good practice and will clearly outline the professional opinion of the expert, this requirement makes application for support very prohibitive on the majority of learners. For example (1) There is up to a 12 months waiting list for an educational psychologist and (2) It can cost up to and above €600 for this professional report. This excludes large numbers of students from applying through the scheme.

(b) How should progress on Special Needs Education be measured?

By directly targeting students who avail of support through the HEA Fund.

(c) What would you consider to be the priority actions and outcomes in this area?

Students who have a recognised lifelong need i.e. sight difficulty, acquired brain injury, wheelchair bound etc should not have to reapply for supports when they leave second school and progress to either FET or HE. A special need passport should be with that students for life and the necessity to be re-interviewed and submit psychological reports when moving from one pillar to another should be removed.

There should be more guidance provision in FET in order to access and work with learner with special needs.

NAPD-FE schools and colleges have to manage special examinations accommodations without state resources. State resources are in place for the SEC; this should be looked at for FET especially for the FE schools and colleges who have examinations in one sitting in May of each year.

Provide a capital budget for FE schools and colleges to upgrade facilities to meet DAC requirements. For example many of the NAPD-FE schools and colleges have compliant lifts, however many will not accommodate a modern wheelchair. There is no capital budget in place for allow this development to take place.

8. Meeting the Skills Needs of the Future

(a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account).

It is commendable that this section makes summary reference to FET, however FET is more than just skills. It is about lifelong learning and developing the potential of the student to engage in employment and/or further and higher progression. All of the other 7 consultation areas are just as valid and impinge on FET students also.

The DES needs to address the teaching contract and the teaching council regulations in order to allow NAPD-FE schools and colleges the flexibility to meet the skills needs of the future by employing industry experts and developing a teaching contract that is not bound by 22 hours a week and 167 days. Flexibility is needed within the sector in relation to provision.

For example: There are many students who would like to gain qualifications, many of them have responsibilities at home or at working. A flexible operational model could explore teaching commencing at 8am on a rolling timetable up to 9pm at night to accommodate teachers who want family friendly work environments to reduce child care costs and students who want flexible provision to avoid child care costs.

In addition NAPD-FE schools and colleges need to be resourced to offer flexible modes of delivery to complement existing provision. For example distance learning through eCollege is an ideal forum within which students can self-direct their own learning, however the current funding and operational model means that NAPD-FE schools and colleges cannot gain the funding benefit from these learners.

Teachers within NAPD-FE schools and colleges need a CPD programme that will upskill them in the skills needed for the economy.

The provision of information from the SMLRU is excellent however within the confines of the current teaching contract, the teaching council requirements, funding and operation models, NAPD-FE schools and colleges can do very little to engage with this data and turn around courses to meet the required needs.

The DES plans to implement a review of Further, Adult and Community Education sector by the Oireachtas Committee on Education and an implementation of reforms to ensure the effectiveness of the sector. Has this not been done already by SOLAS whereby the SOLAS FET Strategy 2014-2019 identified targets and goals for the sector?

(b) How should progress on Meeting the Skills Needs of the Future be measured?

Employment and progression statistics.

(c) What would you consider to be the priority actions and outcomes in this area?

NAPD-FE teachers need a national robust CPD program to upskill in certain areas such where there is a recognised skills shortage.

Where this is not viable given a teachers skill sets, an industry expert needs to be hired in, in order to do so the teaching council requirement needs to be removed.

Make it attractive and worthwhile for employers to engage with FET by being able to deliver on their needs in a responsive and flexible fashion. The current QA requirements for the development of new

QQI awards make this very restrictive. This is evidenced through the slow pace of development of the new apprenticeships awards.

Consider supporting PLC programs or career traineeships in a similar way to which transition year is supported. The DES is supporting a proposal for a new mid-degree “sandwich year” to allow for industry experience, but the model already exists within FET. Consider broadening out the traineeships model to incorporate some of the more vocational PLC programs currently on offer.

Provide adequate capital and teaching/training resources to support the delivery targets of new apprenticeships by 2020.