



Review of Training Packages and Accredited Courses

INTRODUCTION

This submission is made by the Victorian TAFE Association (VTA). The VTA is the peak body for Victoria's public VET providers. VTA members include four dual sector Universities, twelve stand-alone public TAFE institutes and as an Associate Member AMES. Services provided by VTA to members include public policy advocacy, workforce relations advice, education projects, research, government liaison and representation, and professional development.

This submission responds to the Discussion Paper *Review of Training Packages and Accredited Courses*. VTA also responded to the accompanying paper, *Industry Engagement in Training Package Development*, in December 2014. The submission is informed by a focus group of VTA members and member review. VTA members may make submissions individually on matters of particular interest to them.

VTA supports the central contention that industry should play a lead role in defining the industry standards (competencies) that are required by people working in an industry, at a prescribed level, and national training products need to enhance workforce capability including foundation, technical and transferable skills. The VTA notes that the current system architecture ensures this central role of industry: training package design and modification is initiated and determined by industry through their interaction with the relevant Industry Skills Council (ISC).

The implementation in the latter part of the twentieth century of a national competency-based system for vocation education and training (VET) was a landmark reform. In a country the size of Australia competing in the global market, a national systematic approach to industry and occupational standards, and a national qualifications framework, have contributed to consistency of training outcomes nationally and enabled workforce mobility across jurisdictions and globally. Industry and the general public have grown to understand the language of the qualifications framework and attach meaning to the qualifications' titles.

VTA agrees that qualifications issued by RTOs must provide a reliable signal to employers about an individual's skills and must be underpinned by industry-defined occupational standards. As the discussion paper points out, this is not as straightforward as it may appear.

The current system has many features worthy of retaining:

- National understanding by industry and individuals. The implementation of national training packages has enabled, over time, progressive elimination of a plethora of state/territory based qualifications. While there are criticisms of the current suite of training packages, it would be a backward step to return to state/territory based qualifications.
- Industry determination of the skills required in the workplace, through occupational standards (units of competency), that are supported and activated by educational experts who develop the training (learning and assessment) that address the needs of learners to enable them to reach the required occupational standards.
- The ideal of consistency of outcomes for graduates irrespective of where in Australia the qualification was completed.



- Enabling pathways to further learning and skills acquisition through careful design of training package qualifications including a focus on higher level skills at AQF levels 5 and 6.
- Flexibility for contextualisation of the training within the requirements of the occupational standards and recognition of the range of skills and knowledge an individual brings to the training experience.
- Requirement for currency of training packages to meet industry needs.

National consistency in nationally recognised training does not have to compromise local needs provided that the standards enable flexibility without concessions to national consistency. It is most important that each industry sector is engaged at all levels (large, medium sized and small enterprises) in the design of the qualifications and the advantages to industry of a national system are clearly and widely articulated. This provides a challenge in that attracting the interest of a range of stakeholders from a range of enterprises to provide advice, information and intelligence to inform the content and range of the competencies requires an investment of time and expertise. A strategic analysis of the structure of the specific industry area will identify the mix of industry advice that is required for a current and future focussed outcome.

The current training packages, it could be argued, are not designed to reflect the diverse needs of the client group. Tensions may arise between meeting the needs of employers for employees with work-ready skills, and individuals using national qualifications as pathways to further education, including learning skills, theoretical skills and a broader understanding of knowledge at higher VET AQF levels. Training packages are predicated on the client being in the workplace - this is simply unrealistic in many cases as learners are at very different points of their employment journey. This factor is amplified at higher levels on the AQF.

All qualifications are designed to enable access to employment whether at entry level, for career changers or for career progression. National consistency is warranted in all cases. The existing training packages have been designed by industry to meet the specific occupational needs of that industry. Although there may not be a direct correlation between the qualification and the employment outcome achieved, there is potential for this to occur at general employment as opposed to job role level.

REFORMS TO THE SYSTEM OF NATIONAL TRAINING PACKAGES

Consistency and mutual understanding

Employer trust in the outcomes of training packages is essential to their continued uptake of national qualifications. If employer confidence wanes, employers will increasingly look to other, and unaccredited, enterprise solutions. A cornerstone of our national training system is the promise of a consistent application of industry standards to training and assessment and, by inference, consistency in the skills and knowledge graduates bring to the workplace. Anecdotal advice from employers to VTA members suggest that employers are confused by what the value of a qualification is when the duration of learning for the delivery of a qualification are so different. For example, the Certificate III in Plumbing (CPC32413) has 1304 hours – 1864 hours, while the Certificate III in Business (BSB30112) has a range of 315 hours – 610 hours. Both are Certificate III yet the volumes of learning are vastly different. Similar comments are made by employers to VTA members regarding the nominal hours for the delivery of units of competency, complexity of the learning and specificity



of assessment requirements and the variations between training packages in the complexity of the packaging rules. Full implementation of the new Standards for Training Packages, due by 31st December 2015, may resolve issues of inconsistencies between training packages.

VTA proposes the development of reform options that address perceptions of inconsistencies in the current model of training packages.

Mix of Skills

As noted above, the purpose of different levels and types of qualifications is not well understood.

Unacceptably high levels of youth unemployment and disengagement from post-compulsory education need to be addressed. Broad-based preparatory qualifications that focus on general occupational fields, or industries, can be advantageous to young people making the transition to work and further learning. A clear and consistent statement of outcomes for pre-employment qualifications is required. Broad-based preparatory qualifications can be attractive to young people yet to make a firm choice of occupational pathway by providing them with a taster to a range of occupations while not cutting off future options to them in terms of access to subsidised training. Such an approach may encourage completions of qualifications. Employers may benefit from having qualifications better preparing the graduate for work in a generic sense, and a greater pool of potential applicants for employment. Existing examples include the CPC20211 - Certificate II in Construction Pathways and MEM20413 - Certificate II in Engineering Pathways. An expansion of this type of qualification could be beneficial but there must be a clear understanding where these qualifications are preparatory.

VTA supports the practice of recognised skills sets and therefore urges the government to fund the attainment of skill sets as part of training contracts. The identification of skills sets within training packages has the advantage of meeting very specific industry needs. Completion of recognised skills sets rather than a full qualification means the employers and individuals do not have to pay for training they don't need. Take up of skills sets by employers will be enhanced where there is a contribution by government to the costs of training. This must be balanced against the long term benefits of completing a full qualification. There is a danger that a carte blanche approach to skill sets will limit pathways to further learning in VET or Higher Education and lead to exponential growth in completions of partial qualifications, in narrow skill bands, and to the detriment of having workers with transferable skills. The balance between skills sets and entire qualifications is an example of an area in which industry advice and intelligence to ISCs and government is a crucial factor.

The OECD Learning for Jobs¹ noted in 2008, that training packages are 'large and cumbersome making them difficult to use' and 'should be replaced by simple and much briefer statements of skills standards'. While many other recommendations of the OECD at that time have been accepted and implemented, training packages remain voluminous, complex, overly complicated and characterised by high levels of specificity while the language leads to various interpretations by auditors, teachers and regulators. VTA members cite examples where the requirements of the training package qualification are undeliverable and unassessable. The divide between training package qualifications and the logistics of delivery of the training program reflects the lack of consultation with educators

¹ LEARNING FOR JOBS: OECD REVIEWS OF VOCATIONAL EDUCATION AND TRAINING – AUSTRALIA 2008



in the development of the qualification. The apparent simplicity of the Vocational Pathways in New Zealand compared to the current Australian system is attractive.

System architecture

VTA supports a national training system with the capacity for additional qualifications to be nationally accredited to meet identified gaps in the current qualifications on offer. This approach has resulted in many of these qualifications becoming part of the national system of training packages over time. To shift the balance, however, away from nationally recognised qualifications to non-accredited qualifications could lead to an excess of credentials and confusion among employers and individuals about the value of the qualifications. While training packages are not perfect, the benefits of national recognition and portability of qualifications must be retained.

The current Review also presents an opportunity to reform approaches to revising training packages. Our members stress the need for a degree of stability in the content of training packages and training packages must reflect contemporary needs of industry with content that is up-to-date and forward looking. The change process for training packages however must be cognisant of the practicalities of implementation of changes. RTOs have seen in recent years a seemingly constant stream of changes to training packages (minor and major) to implement, in at times, impossible timeframes. VTA proposes that the options for reform of industry identified sections of a training package consider a fixed period, for example 3 years, for the 'life' of each industry section of a training package before major changes will be required and that minor changes can be accommodated in a more common-sense way. A training package is a sprawling beast that addresses multiple industry sectors. The qualifications for each sector would benefit from a defined life cycle to promote consistent and organised delivery within RTOs.

We acknowledge and share VET stakeholder concerns about the number of training package qualifications and accredited courses on the national register and agree there is scope to review the number of qualifications on the national register. Should this reform occur, and qualifications are removed from the national register, extremely robust review criteria must be developed to ensure no individuals with active enrolments are excluded from the opportunity to finish qualifications. Unfortunately training packages do not present a single model and address a wide range of industries with a wide range of profiles. Training packages are appropriate where there is a defined industry need for vocational competence. This can be at any AQF level and the training package structure can accommodate this. Training packages should not be used in situations where there is no clear, defined "vocational competence". These require different pedagogical constructs, for example, fine art.

Nomenclature

National Training Packages currently act as the proxy for occupational standards aligned to a range of AQF qualification levels. As pointed out in the discussion paper (page 8), '(t) raining packages are not curriculum and do not prescribe the way training is delivery to an individual', yet the words 'training package' imply that the information contained in the documentation will provide the details for how to deliver training to achieve the qualification. When training packages were introduced in the late 1990s, it was understandable that industry and RTOs would need some time to adjust to the new standards and nomenclature of 'Training Packages'. However, when after all these years there



is still a lack of consistent understanding of what training packages ‘are’ and ‘are not’, it is time to rethink the nomenclature. An alternative ‘Occupational Standards’ is not supported by VTA because the interpretation could:

- lead to a very narrow interpretation of ‘occupation’ that may lead to fragmentation of work roles,
- lead to descriptors that are too instrumentalist, and
- result in maintenance of more qualifications than under the existing Training Package model.

VTA supports further consideration of a review of the nomenclature in the development of reform options.

Conclusion

An essential feature of any industry-defined qualifications must include educational expertise including whether units of competence are deliverable and assessable. This is the anomaly at the heart of training package architecture. Industry defines the vocational competencies they require. It is the responsibility of the educational specialists within RTOs to develop a curriculum for particular students to enable them to achieve the vocational competence. Requiring non-educational experts (ISCs) to address pedagogical matters (i.e. assessment requirements under the new Standards) without the advice of education experts is inappropriate and results in confusing and misleading requirements in competencies.

There is a fundamental difference between a set of industry standards and the document that is designed to provide benchmarks for delivery and assessment against these competency standards. Educational expertise will bring an essential dimension to the development of training products. VTA advocates that RTOs, as the educational experts in the delivery and assessment of qualifications, should have substantial input into the development process including the skills mix. TAFE institutes and dual sector Universities across Australia offer qualifications and skills sets from the vast majority of training packages and have long histories developing accredited courses. The qualifications offered span the AQF level 1 – 8 for the VET sector. As educational professionals TAFE and dual sector University staff have deep understandings of vocational education and training and the pedagogy to respond to the diverse needs of industry. Their expertise is in the design and delivery of the learning and assessment to meet the requirements of the training packages or their successors. Innovation and development opportunities will be heightened through co-operation and collaboration between developers of industry standards (articulated in training packages) and educational technical expertise.

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