



Submission to the VET Reform Taskforce

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**REVIEW OF TRAINING PACKAGES AND ACCREDITED COURSES –
DISCUSSION PAPER**

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This submission is made by TAFE Directors Australia (TDA) on behalf of its members.

TDA welcomes the opportunity to respond to the Discussion Paper Review of training packages and Accredited Courses. Given the national role of TDA, we believe the association is well placed to respond to the Paper.

ABOUT TAFE DIRECTORS AUSTRALIA (TDA)

Established in 1998, TAFE Directors Australia (TDA) represents 58 Technical and Further Education (TAFE) providers offering programs in more than 1,300 locations across all states and territories. TDA members are represented by the TAFE Chief Executives. The TDA national secretariat is based in Sydney and is focused primarily on policy development and advocacy for TAFE providers in both the vocational education and training (VET) and higher education sectors.

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BACKGROUND

TDA supports the Government's stated position that the development of skilled people is central to Australia's productivity, participation and growth.

TDA also supports a vocational education and training (VET) system based on competency standards and qualifications that have been developed and endorsed by industry, have national applicability, and reflect the Australian Qualifications Framework (AQF). Australia's competency-based VET system is highly regarded internationally.

However, this review is timely. While training packages have provided a solid base for the specification of work related competency standards and work related qualifications, and enhanced competitive strength for Australian industries, TDA members maintain there is still scope for improvement. By building on the current system, Australia could improve and simplify training packages to better meet industry competency specifications and qualification requirements.

This paper does not discuss the strengths of training packages, or the continued strong support from the community and employers, but concentrates instead on the areas where TDA understands there is scope for improvement, particularly in response to implementation by RTOs and TAFE institutes.

TDA notes that new standards for regulating the operations of RTOs, particularly in matters of interpretation and implementation of training packages, will be implemented during 2015.

Scope for improvement

As a prefacing comment to the following section, TDA also notes that the new standards for streamlining training packages were only issued in 2012 and only 12 of the 72 training packages have been developed under these standards. None as yet have been implemented or evaluated.

Nevertheless, TDA has identified a number of areas where there is scope for improvement including:

- 1. Nomenclature*
- 2. Consistency across and within packages*
- 3. Relationship to AQF*
- 4. Capacity for educational pathways*
- 5. Impact of jurisdictional funding*
- 6. Capacity for assessment*
- 7. Relationship to compliance*
- 8. Innovation and flexibility*
- 9. Red tape.*

Details of each of these areas are addressed in the following sections of this paper along with recommendations for improvements.

1. Nomenclature.

TDA members generally regard the term 'training package' as a misnomer. They maintain that the term implies that a package relates to the training of individuals, rather than being a set of industry standards which specify how a person can demonstrate competence in the workplace. They argue further that while a training package gives guidance on how units of competency can be assessed, and specifies rules for aggregating units of competency into qualifications, it provides no guidance on how training should or could be provided by a Registered Training Organisation (RTO), including a TAFE institute. These members maintain that training packages could be improved through changed nomenclature such as, 'Industry Competency Standards and Qualification Requirements'.

However some TDA members feel that the term Training Package is now so well established in the VET lexicon and recognised by industry and RTOs that changing the term would cause unnecessary confusion without improving quality.

2. Consistency across and within packages

A significant area for improvement lies in ensuring consistency in the way units of competency are written across all training packages, and within training products. Greater consistency is required in:

- the use of language, of structure and of specification of content both within and across training packages;
- the use of AQF taxonomic terms of apply, analyse, evaluate, synthesise in ways that accord with the AQF;
- the relationship between assessment requirements, titles of units and of skills requirements;
- the use of common generic units such as Workplace Health and Safety, Communications etc.

While units of competency can be imported from other packages, there is evidence of duplication e.g. in Occupational Health and Safety units.

These issues are addressed in more detail in the following discussion.

3. Relationship to AQF

Clearly there is scope for considerable improvement in the alignment of units of competency and qualifications in training packages to the Australian Qualifications Framework (AQF). Even cursory analysis shows marked differences in the specification of performance criteria, knowledge and skill requirements, and in the required volume of learning of qualifications across and within training packages. For example, compare the volume of learning requirements of the ICA60511 Advanced Diploma of Computer Systems Technology (1,070-1,400 hours) and the AUR31312 Certificate III in Automotive Engine Reconditioning (1,105-1,205 hours) to the volume of learning requirements of the BSB60807 Advanced Diploma of Recordkeeping (260-420 hours) and BSB30712 Certificate III in Work Health and Safety (223-337 hours).

There are also wide discrepancies between specification of the knowledge and skill requirements in units of competency. For example compare the knowledge and skill requirements of the unit 'UEENEEG105A - Verify compliance and functionality of low voltage general electrical installations', from the 'UEE30811 - Certificate III in Electrotechnology Electrician' qualification, with the knowledge and skill requirements of the unit 'SIRXIND101 - Work effectively in a customer service environment' from SIR30212 - Certificate III in Retail Operations.

While the volume of learning for a unit or qualification is defined under the AQF requirements, nominal hours are generally managed by State/Territory governments by way of funding caps.

Problems arise when training package qualifications and units of competency 'over claim' in relation to application requirements of the AQF. The description provided in the following Advanced Diploma unit of competency is a good example.

BSBMGT617A - Develop and implement a business plan states

- *This unit describes the performance outcomes, skills and knowledge required to run a business operation and covers the steps required to develop and implement a business plan; and*
- *This unit applies to individuals who are running an organisation or who take a senior role in determining the effective functioning and success of the organisation. As such, they may oversee the work of a number of teams and other managers.*

Whereas the AQF for an Advanced Diploma states

- *Graduates at this level will have broad knowledge and skills for paraprofessional/highly skilled work and/or further learning; and*
- *Graduates at this level will apply knowledge and skills to demonstrate autonomy, judgement and defined responsibility:*
 - *in contexts that are subject to change;*
 - *within broad parameters to provide specialist advice and functions*

A Masters degree in the AQF is specified as

- *Graduates at this level will have specialised knowledge and skills for research, and/or professional practice and/or further learning and*
- *Graduates at this level will apply knowledge and skills to demonstrate autonomy, expert judgement, adaptability and responsibility as a practitioner or learner.*

The AQF has particular use of terminology of apply, analysis, synthesise, evaluate, consistent with Bloom's taxonomy. For example the skill of 'synthesis' does not appear in the AQF until level 9 or Masters degree level. The skill of 'evaluate' is similarly not used in the AQF until level 7 or Bachelor degree level. Both of these qualification levels are above the level an Advanced Diploma (level 6) which is generally the highest level in a training package. The skill of 'analysis' does not appear in the AQF until level 5 - Diploma.

There are countless examples of these terms being used in units of competency throughout training packages which are clearly inconsistent with the AQF skill level requirements. A search of the BSB07

training package for the word 'evaluate' shows that the term 'evaluate' is used 659 times. The BSB07 training package has no qualifications at AQF level 7 or above.

For example,

BSBINT306B Apply knowledge of international finance and insurance to complete work, an AQF level 3 unit, which requires students to:

- Seek assistance of enterprise personnel and relevant third parties if required, to interpret, **analyse** and **synthesise** required information (Performance criteria 3.3); where
- The required skills include **analysis** skills to **evaluate** knowledge and skills gaps.

The mismatch of AQF terminology across training package qualifications has significant impact on the assessment requirements of students and assessment practices of RTOs.

Scope for Improvement

1. Units of competency be written with consistent application of AQF terminology;
2. All future training product qualifications specify a volume of learning range;
3. All future qualifications include a statement specifying their relationship to the AQF;
4. All future qualifications and units of competency are signed off by specialist AQF assessors, prior to endorsement;
5. RTO representatives are formally involved in training package development processes.

4. Capacity for educational pathways

Training packages have qualifications specified and sequenced in ways that meet the skill requirements of organisations as people progress through the organisation structure. As such training package qualifications are not described in AQF/educational terms but in terms of a work role. As a general rule, qualifications do not have specified entry requirements (there are a few exceptions such as higher level Accounting and Electrotechnology qualifications) and while pathway information is provided, it is advisory in nature. This approach enables many workers with relevant work roles to enrol or be enrolled in diploma and higher level qualifications without having prior educational qualifications. However it does not encourage the development of educational pathways of these workers or others who are not in work.

Young people who have completed year 12 at school and wish to enter VET often look to enter at the Diploma or above level. However, most Diplomas and all Advanced Diplomas have not been designed to accommodate this cohort, or people who are unemployed, or are wishing to retrain, or to return to work. one solution has been for RTOs to offer students a pathway comprising a package of qualifications that commences with a Certificate I-IV, advances to a Diploma and then to an Advanced Diploma.

Although such a pathway approach may meet training package rules and be educationally valid it has unintended consequences.

Firstly it makes VET programs unattractive in relation to higher education programs. Given the current competitive nature of education many more exit year 12 students are now able to proceed directly into higher education programs at either universities or private higher education institutes (which includes some TAFE institutes)

Secondly, anecdotally some students undertaking an agreed pathway program are now insisting that they are legally entitled to progress to the higher qualification, even though they have not achieved the lower one, on the basis that there is no requirement to have passed the lower qualification, and there are no entry requirements.

Finally, the work related nature of training packages, and strong focus on workplace competencies, precludes a range of broader educational areas being included in qualifications. These include areas such as mathematics, English expression, information gathering and writing skills which, when lacking, are often a significant detriment to learning and articulation into higher education institutions both in Australia and overseas. Many articulation programs include additional and mutually agreed units and/or subjects in addition to the training package requirements to address this issue.

It should also be noted that the lack of entry requirements or other specifications as a requirement to enter or undertake a qualification is a factor that contributes to the high numbers of enrolments and the low success rates for programs associated with VET fee help.

Scope for improvement

1. All entry and pathway requirements for qualifications are written to ensure that applicants must have either:
 - Relevant work role; or
 - Specified qualification(s);
2. Consideration be given to having a broader range of educational issues being included in training products for all qualifications;
3. Representatives of RTOs are formally involved in training package development and maintenance processes.

4. Impact of jurisdictional funding

The volume of learning requirements for qualifications and units of competence are specified by way of funding caps by State/Territory governments. Every unit of competency/qualification has an allocated number of hours (nominal hours) beyond which RTOs/TAFE institutes are not funded. This mechanism serves to set the benchmark volume of learning requirements for each qualification, irrespective of whether funds are provided. Given that TAFE institutes are funded by state governments for a fixed number of hours per qualification, it is not possible to meet the AQF volume of learning requirements for many qualifications. In the case of international students, this benchmark volume of learning is used as a de facto course duration and consequently determines the length of a student visa.

When funding per nominal hour is reduced, and prices are driven down in competitive training markets, less time and resources are able to be given by RTOs to delivery and assessment processes. This inevitably leads to lower quality of VET provision. It could be argued that TAFE institutes and other RTOs are free to set their own fees with the student being asked to pay any difference. Unfortunately, like any market when the product is the same, price not quality becomes the determinant. A corollary matter is that low funding rates for VET qualifications by state governments (leading to higher student contributions), coupled with the uncapping of subsidies for higher education students and greater accessibility to higher level qualifications, has led to a decline in enrolments in VET qualifications for post school leavers who prefer to enter university.

Scope for improvement

It is acknowledged that this issue is outside of the scope of this review but unless addressed will make any outcomes of this review redundant.

5. Capacity for Assessment

Assessment is a primary focus of training packages. Currently training packages give advice on, but do not specify how assessment should be undertaken. They do however specify what has to be assessed. In general terms this means that all specified skills, knowledge and critical aspects of evidence and performance criteria have to be assessed taking into account the context of assessment, resource and range statements of the unit of competency. RTOs must be able to provide evidence of the assessment that the student has undertaken and how such assessment relates to all of the components of the unit of competency.

In addition RTOs have to be able to show for each unit of competency how they have met the rules of evidence and principles of assessment.

The work oriented language used in training packages makes already complex assessment tasks more challenging by assuming that the person being assessed is working and is doing the specific job the unit relates to. Units of competency are not specified in ways that support or encourage people to prepare for work or to change work roles.

Workplace simulation is suggested in training packages as an alternative if a person is not working, but simulated work environments present a range of issues. For example, the BSB07 training package indicates (page 164) that to be valid and reliable, the simulation must closely represent what actually occurs in the workplace and should seek to replicate an actual work setting. Further, the designer of the simulation must be thoroughly familiar with the application of the competency and experienced in current and relevant workplace practices. When deciding whether a simulation or an assessment environment has been adequately designed, the following questions should be asked. Are there opportunities to:

- test the full range of equipment?
- use up to date equipment and software?
- reflect time pressures and deadlines?
- show the complexity of dealing with multiple tasks?

- involve prioritising among competing tasks?
- deal with customers, including difficult ones?
- work with others in a team?
- communicate with diverse groups?
- find, discuss and test solutions to problems?
- explore health and safety issues?
- answer practically oriented, applied knowledge questions?
- show the level of written and verbal expression sufficient for, but not exceeding, the work requirements?

In this regard the cost and complexity of establishing effective simulated environments in many areas is prohibitive.

The following example illustrates why TDA considers that there is scope for improvement in how assessment requirements are written in competency standards:

Consider the assessment evidence that might be required for the following 2 of 17 performance criteria in the unit 'BSBMGT617A - Develop and implement a business plan':

2.5. Report system failures, product failures and variances to the business plan as they occur; and

*3.3. Ensure groups and individuals contributing to under-performance are **coached**, and provide training where appropriate".*

Assessment in this unit is also specified as being essential for:

- *analysis of the strengths and weaknesses of a range of business plans;*
- *implementation of a business plan including evaluation of performance against documented indicators in key results areas;*
- *knowledge of performance measurement approaches and benchmarking.*

Together with assessment of:

- *analytical and research skills to review the market, to research competitors and to review pricing structures;*
- *coaching and communication skills to remediate any under-performance in the work group or individuals;*
- *planning and organising skills to sequence activities and to develop a logical structure;*
- *performance measurement approaches and benchmarking;*
- *options for developing business plans.*

It should be noted that this unit has an allocated number of training hours in Victoria of 60.

Not only is assessment of the above performance criteria and other components difficult without actually undertaking the job for which the unit relates, it also raises considerable issues of individual privacy and corporate commercial in confidence. ASQA as the regulator requires that all assessment items for each student for each unit be stored for a minimum period of 6 months and made available to auditors who freely quote student names and IDs in audit reports, which are then often publicly available.

There is also inconsistency in this unit where, despite the title "*Develop and implement a business plan*", there is no performance criterion for actually *implementing a business plan*, but there is an essential evidence requirement. It should also be noted that each of the 2 listed performance criterion in the case study above contain more than one criteria, as do the majority of the other 15 performance criteria for the unit. For TAFE institutes and RTOs each and all criteria need evidence of assessment. This unit is not an isolated example.

Scope for Improvement

1. Future units of competency provide clearer specification of skills and knowledge and less performance criteria and require assessment of skills and knowledge and not performance;
2. Future units of competency are written in a way that does not specify assessment evidence (*in particular performance criteria*) that can only be met by
 - infringement of the student's or colleagues' or stakeholders' privacy;
 - employers having to give approval or release for use of required assessment evidence
 - exceeding the AQF skill requirements;
 - imposing excessive assessment requirements (*e.g. multiples of performance criteria*);
3. Representatives from RTOs are involved in training package development and maintenance processes.

6. Relationship to compliance

The complexity of qualification structures and units of competency, coupled with the mandatory nature of assessment requirements, makes 100% compliance with regulatory requirements almost impossible if assessment evidence is sought on all components of any unit of competency. The example used above BSBMGT617A demonstrates this point.

Assessment requirements epitomise the tension between work based industry competency standards and educational assessment practices. Educational assessment practices have to take into account the practicalities of assessment such as issues of feasibility, privacy, confidentiality, legislation, along with issues such as fairness, validity, sufficiency, reliability, authenticity, currency etc. whereas competency standards developed by industry are absolute and can simply state what a worker is expected to be able to do, how they are to do it and who they should relate to. This does not take into consideration how evidence of assessment of performance or relationship or knowledge or skill can actually be obtained, particularly if the student does not have a job, or is not working in the role or area that the competency relates to.

In all too many cases the interpretation of auditors operating on behalf of the regulator is similarly industry focussed and free from considering this broader context. Compliance means that evidence relating to all units of competency requirements is available and stored.

The exact wording of units of competency is a critical factor in any audit to determine compliance with standards. Not having evidence of assessment for any component or subcomponent of a unit of competency gives rise to a finding of not compliant, similarly having assessment evidence that might in the opinion of the RTO/TAFE institute match the intent of the unit is similarly able to be found to be noncompliant if the evidence does not match the exact wording of the unit.

As the regulatory audit processes are focussed on the very specific wording of the units of competency requirements, when AQF levels are not appropriately recognised in qualifications, assessment requirements become distorted. As shown above, it is feasible that Certificate III level students can be required to produce Master's degree level evidence and that the RTOs would be found to be noncompliant if such evidence is not available.

Scope for Improvement

1. Representatives from RTOs be involved in training package development processes
2. Units of competency be written with consistent application of AQF terminology;
3. Units of competency are written in a way that does not specify assessment evidence (*in particular performance criteria*) that can only be met by
 - infringement of the student's or colleagues' or stakeholders' privacy;
 - employers having to give approval or release for use of required assessment evidence
 - exceeding the AQF skill requirements;
 - imposing excessive assessment requirements (*eg multiples of performance criteria*);
4. Units of competency are reviewed by people with audit experience prior as a part of the development process.

7. Innovation and flexibility

In a number of cases training packages have become large, repetitive and complex documents which are difficult to interpret and use. They are also the bedrock of the regulatory audit process and lend themselves to a very literal interpretation by auditors. The lengthy time it takes to update training packages means that changes in job roles, skills or work requirements, or specific requirements of students, are not easily addressed in innovative or flexible ways. Further questions arise about the standardisation of work activities (one size fits all approach) which, when assessed in specific ways, can mean that new and innovative practices that do not meet pre determined assessment tasks can be overlooked. Concerns have also been raised about the narrow focus on workplace tasks and roles for particular jobs instead of preparing learners with the capability to adapt to new and emerging job roles.

TDA would support the development of accredited courses as a way of improving flexibility and furthering innovation in the sector. Accredited courses that are developed with direct support of industry, or specific community or regional groups, would be a way of increasing the relevance of training to many groups and individuals.

Accredited courses could be developed where training packages not only do not provide broad coverage, but also where they are not able to meet the specific needs of innovative companies or the special needs of community or regional groups.

A sense of ownership by the developers can increase the likelihood of high quality delivery and assessment and the specified need for the course increases innovation and flexibility.

Scope for Improvement

- Encourage the development of accredited courses that meet specific needs of innovative companies or the special needs of community or regional groups.

8. Red tape

The actions taken by the Commonwealth Government to cut red tape and eliminate fees imposed on training providers when minor changes are made to training packages are welcomed by TAFE. This will reduce the significant administrative and financial cost of applying to ASQA, or paying a fee when a training package qualification is changed. Churn in training packages has been of concern to TDA members for a number of years for this reason and also for the unsettling effects on students. The lack of flexibility of training packages could be addressed by reducing the red tape involved in developing alternative courses.

TAFE institutes and other RTOs that are regarded as low risk, and already have delegated powers for extending their scope of registration, should be eligible to apply to have delegated powers to accredit their own courses. This could be achieved under the oversight of VET industry reform approved accreditation advisors and through well structured RTO accreditation committees chaired by senior community or regional or industry members.

The time line for the approval of accredited courses should be minimised.

Scope for Improvement

- Allow TAFE institutes and other low risk, high performing RTOs, who already have delegated power to extend scope of registration, to develop and accredit their own courses, to be placed on the national register.
- Broaden the criteria to allow the development of accredited courses.
- Minimise the time for approval of accredited courses.