TAFE Directors Australia response to

NSSC Consultation Paper Implementing Quality Measures in Industry Training Packages

TAFE Directors Australia (TDA) welcomes the opportunity to respond to the NSSC Consultation Paper Implementing Quality Measures in Industry Training Packages.

TDA is the peak body for 61 technical further and education providers delivering training and assessment across all states and territories. Our members deliver nationally accredited training to a significant majority of vocational education and training students across Australia. As such TDA has a strong interest in the quality of the outcomes of the vocational education and training system and the confidence of individuals, employers and the community in the integrity of the qualifications issued by all providers.

TDA has developed this submission on behalf of its members, but is mindful that a number of TAFE institutes will make their own submissions on an institute, or jurisdictional basis. In developing this submission TDA requested input from its members and convened a focus group in collaboration with the Victorian TAFE Association. Their views are reflected in this submission.

TDA acknowledges the impetus for ISCs to sponsor the Allen Consulting Group VET quality project. TDA too has expressed its concerns in a number of forums about the reputational impact to the vocational education and training sector of poor quality delivery and assessment by some providers.

Nevertheless TDA members are not convinced that the proposals in the Allen Consulting Group paper VET Quality project will assure greater quality delivery and assessment. The overwhelming response of our members has been that were these quality measures to be implemented by ISCs even on an optional basis, they would impose a considerable administrative and cost impost on providers and potentially stifle the capacity of TAFE institutes to be flexible and responsive in meeting the needs of students and employers. Training Packages should be structured in a way that allows for differentiated products to exist in the market place while delivering consistent outcomes. The proposals to increase specificity in some Training Package qualifications or units of competency will come at a cost to our institutes and will not necessarily enhance outcomes for learners or employers.

TDA maintains that the VET Quality Project does not sufficiently recognise the diverse ways in which teaching staff gain industry currency (See the comparative professions vis-à-vis VET study on industry currency managed under Berwyn Clayton et al, and on the NCVER website http://www.ncver.edu.au/publications/byauthor.html?sub=Berwyn%20Clayton ). This study places emphasis on how engineering and related professions achieve currency, which while proscribed is also focused on
workforce professional development. The research confirms core skills across both areas of learning for what they are. Research findings such as these should inform the development of standards and how measures are applied.

The quality of Training Packages are currently uneven, dependent it would seem on the quality of the consultants who are commissioned by ISCs to develop them. There is a good argument for a more collaborative approach by developers and educators to achieve packages that lend themselves to quality delivery and assessment.

The costs and impact to learning process of change can impact credibility of Training Packages, and these matters might be nominated as an increasing issue because of constant tension of constant “churn.”

At this stage TDA is of the view that there are too many unresolved, contradictory and cost related issues to consider including the proposed quality measures in the development of the new AVQS.

The following comments from a large public provider with many campuses in Australia and abroad illuminate some of the issues identified by a number of our TDA respondents:

“Where in this document have the proposed changes improved educational perspectives? Is the purpose of this document to be a prescriptive homogenous modus operandi for a heterogeneous education industry? Surely educational experiences need to be considered as a primary goal for any change. This document provides one with the notion that the answer to quality education is a ‘red tape’ process of one size fits all providers, rather than the value of knowledge and capability of a TAFE provider. TEQSA has taken a step in eliminating red tape for quality providers, by injecting epistemological paradigms, learning outcomes and learning experiences as the primary goal. Why can’t the NSSC take a page from TEQSA’s book and follow suit? Are the answers to VET quality only privileged to the mindset of auditors? The methodology and orientation of these proposed changes do not legitimise quality, as this prism of auditor regulator instrumentalism, does not construct or produce meaning & knowledge. Students need to make sense if they are to learn, the proposed quality measures do not in any shape or form, represent educational experiences, only provider processes.

Nowhere in this document is there any evidence of intended student learning outcomes, nor any demonstration of coherent epistemology. To take a ‘pragmatic’ view, Creswell (2003:11) says ‘for many of them knowledge (epistemology) claims arise out of actions, situations and consequences rather than antecedent conditions’. There is a concern here with application of what works, and a concern with application to solutions to problems. These proposals do not resonate, rhetoric that outlines pedagogical paradigms for knowledge acquisition, rather it restricts access to learning outcomes. How do students construct their own meaning, when the above criteria are tied to red-tape processes rather than practical outcomes of learning that are specific to auditor’s experiences of non-capable private providers? It is outrageous to rank all providers with equal ranking”.


Specific comments on quality measures proposed

Specific trainer requirements

- Increasing the requirements for trainers to have a vocational qualification at a level above the level they are teaching is not going to necessarily assure quality outcomes.
- Increasing the requirements for trainers to have a vocational qualification at a level above the level that is being assessed, does not mean that a quality teaching process is achieved. There are ample examples of quality teachers with same level qualifications as learners being taught. There is a need to take into consideration vocational competence, currency and experience.
- There are enormous implications for recruitment pool, costs and of casual and contract staff.
- There is a huge cost negative in this proposal that many providers would not be able to endure
- Strengthening teacher qualifications however is critical to quality delivery and assessment and vocational outcomes, consistent with Training Packages standards.
- If the requirements change there are enormous implications for recruiting and developing casual staff; professional development implications/costs; increased need to allow for ‘unqualified’ staff to be supervised.
- Negotiated lead times to introduce change are necessary. Lead times may of necessity vary from Training Package (industry) to Training Package (industry). Example of impact in plumbing training as an example.

The language of delivery

- AQF allows for flexibility in the use of language but the Training Package may restrict to delivery in international markets to English. This best defined via the Australian Qualifications Framework not the Training Package.
- Members have very large off-shore delivery in Asia. Clients do not speak English, and so programs must be delivered in countries’ native tongues. The ramifications are significant for International education, financial turnover, teacher and administrative employment, and the Australian educational footprint in Asia.

Learner characteristics

- Members found the definitions not helpful in contextualising the change and impact of the change. For example ‘language’ levels. What does that mean? A particular level? On what scale of measurement? Is it addressing LLN levels? The definitions need tightening and to be more specific.
- ISC’s do not have direct access to client needs, the prescription of delivery would be very complex and ill-informed.
- How will ISC’s ensure that a learner’s self-concept moves from dependency to independence or self-directedness with a prescriptive one size fits all?
- How will andragogical principles be harnessed in this prescriptive mode? An adult’s readiness to learn becomes increasingly associated with the developmental tasks of social roles, how will this be prescribed.
Learning resources,

- Members universally disapproved of this change noting that prescription of resources may create a conflict of interest for resource producers (eg ISCs). Resources can be ‘recommended’ by not mandated. It should also be understood that in many cases resources developed by ISC’s have been deemed non compliant by ASQA auditors. Selection of resources of necessity must be tailored to the needs of students in the context of the learning design. Competency standards specify standards for performance. What does it mean for auditors, students and trainers if learning resources are mandated? Prescribing resources may limit innovation and the ability for RTOs to add value to the learning experience.

Assessment measures,

Members generally viewed the changes as industry focused ISCs unnecessarily interfering in the educational domain. Other comments raised included:

- Changes have the potential to stifle innovative assessment practices with industry.
- Changes show a lack of understanding of good teaching and assessment practices.
- The administrative impost of the changes will be hard felt, especially by large providers with hundreds of courses on scope.
- Internal quality processes already exist and should be the foundation of quality assessment and regulatory compliance.
- Measures related to ‘reasonable adjustment’ are not necessary as these are covered by higher order compliance/legislative requirements.
- The need for greater educational input into the design of Training Packages to ensure consistency with the requirements of the AQF particularly in relation to the use of language to specify assessment requirements in a way that is consistent with the AQF Knowledge, Skills and Application of knowledge and skills appropriate to the qualification level.
- Existing engagement with industry input to validation and there is no need for changes to Training Packages in this regard.
- Is the employer or the student in a marketised VET model in a position to discern quality training and assessment?

The volume of learning,

This is the role of the AQF (existing) not the ISCs. Training Packages should be compliant with the AQF and if they are not, the AQF is the point of alignment. In relation to the mode of delivery, participants felt the measures were contrary to equity principles underpinning VET.

Should you wish to clarify any aspect of the TDA response please contact Pam Caven, Director Policy & Stakeholder Engagement at pcaven@tda.edu.au

TAFE Directors Australia welcomes further discussion on implementing quality measures in industry Training Packages consultation paper.

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