

# **WORKING PAPER ON IMPROVING TRAINING PACKAGE PROCESSES TDA COMMENTS**

The ANTA Working Paper is introduced by reference to the *High Level Review of Training Packages*. The *High Level Review* clearly re-affirmed a lead role for industry in determining the outcomes and qualifications specified by training packages but it also recommended a number of significant changes in the way training packages are constructed, understood and interpreted.

The ANTA Working Paper is highly selective in its consideration of some of these changes – giving much emphasis to some while others are either mentioned only in passing or simply ignored altogether. In general terms, the paper focuses on the need for more “rigorous” and “inclusive” training package processes (which TDA supports) but virtually ignores the equal or greater emphasis in the *High Level Review* on greater flexibility, fewer rules, better design criteria and a recognition that training packages cannot and are not intended to cover the full range of courses and activities of the VET sector.

The net result is a working paper which seeks to strengthen the role and representation of stakeholder groups in order to create the “new settlement” anticipated by the *High Level Review*. The emphasis on strengthened provider input is laudable. But it is of concern that the paper fails to seriously challenge the existing distribution of authority for decision-making; it also fails to propose effective mechanisms to actually improve the quality and utility of training packages.

## **Strengthen Provider and Equity Input (Section 4.5 of the paper)**

Of particular concern for TAFE is Section 4.5 of the paper.

The options proposed are designed to strengthen the input of RTOs and lead to improvements. We particularly support the sourcing and sharing of good practice models and establishing networks of providers to assist ISCs. Yet what is being proposed still falls well short of what is required.

We emphasise that we have no disagreement with the assertion that industry has a critical role in determining training outcomes in terms of units of competency which are a ‘holistic specification of industry needs’

However, this is hardly the point. The detail and complexity with which each ‘holistic’ unit MUST be disaggregated and described in terms of elements, performance criteria, range statements and evidence guides presents real problems. It almost inevitably leads to fragmentation and an incremental, rather than a holistic, approach to delivery and assessment.

The suggestion that TDA and ACPET be directly represented in advising on the *delivery* of training packages<sup>1</sup> is totally inadequate for the resolution of these issues – each training package requires expert *design input* by educationists as well as industry representatives conversant with particular occupational fields.

If such detailed requirements for unit descriptors are to remain, it is essential that experienced curriculum designers have an equal or greater role than “industry” in drafting their content and in the structuring of the overall training package. The reason for this is that elements of a task or competency as performed in the work place are not the same as the elements which need to be taught in order for a person to learn and acquire that competency. Nor is the same evidence of competency equally valid.

One way to resolve these concerns might be to build the leadership role of Industry Skills Councils . These ISCs could be mandated to convene national training curriculum standing committees comprising appropriate training design experts. These committees would then be responsible for designing the content of the units of competence and the overall structure of training packages while the ISC would remain responsible for accepting and approving the overall package as a pre-requisite to national endorsement.

As part of this approach, proper consideration would need to be given to ways of identifying appropriate sources of expertise. Given that TAFE Institutes are responsible for a large proportion of delivery of training package qualifications, there is a case for TDA to be funded to develop a database of areas of expertise in order to identify people who could make a strong contribution to this work.

#### **Communication and information sharing (Section 4.6)**

There seems to be some overlap between sections 4.5 and 4.6 in terms of consultation, communication and information sharing which is not helpful. Whilst it is important to include acknowledged experts in consultation during the development / review of training packages, all RTOs need to be included in the information sharing process.

Currently training package developers do use web based communication and feedback and have issues registers, however these are not maintained once the training package is endorsed. The proposal that these be maintained on an ongoing basis is sound and supported as it will facilitate feedback on implementation issues. Indeed it may, in the medium term, contribute more to achieving the desired consistency of approach and outcome than the sum of all the numerous rules and detailed specification requirements which are currently the hallmark of training packages.

However it is critical that this proposal is not seen as an alternative to a structured review process and it cannot substitute for the research and analysis currently undertaken in Phase 1 (see next section).

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<sup>1</sup> Section 4.6, page 7 of the Working Paper

## **Streamlining processes**

Section 4.9 contains the proposal to phase out the two staged review process and replace it with a 'continuous improvement' model. We do not support this change.

The two staged review consists of a research and scoping phase and a redevelopment phase. Phase 1 is critical not only to ensure feedback is formally sought but also to research changes to an industry area in terms of scope, technology and work organisation that may impact on skills and knowledge required for different jobs. For example in the review of the Laboratory Operations Training Package (PML99) the Phase 1 review identified the need for a new Certificate II in Sampling and Measurement with clear vocational outcomes for people working as samplers / testers in three industry sectors where there was no qualification at this level in the existing package. Research undertaken in Phase 1 also identified new emerging areas such as Biotechnology and whilst in PML99 there were four specialisations identified at the Diploma level in PML04 has 12 with the provision for RTOs to identify and name further specialisations.

The parameters for Phase 2 development or redevelopment of the training package are determined in Phase 1. Extensive and formal reviews are necessary to determine both the current and future employment demand. The ongoing information gathering and fine tuning of an existing package by the ISC is not sufficient as an alternative.

In terms of the operations of large TAFE institutes the continuous improvement proposal also presents difficulties because they require clearly defined cycles of course review and and would find it difficult to accommodate a continuous rollout of changes to training packages which need to be constantly monitored, interpreted and translated into amendments to courses being offered.

## **Building capability**

The proposals in section 4 have a strong emphasis on role clarification and capability building for

- ANTA officers supporting training packages development and review, especially in relation to quality assurance as well as project management
- ISCs in terms of complex project management, training package quality, collaboration and information sharing
- NPSCs in terms of their role in quality and design of the package
- STAs in terms of training package structure and regulatory requirements as well as cross jurisdictional information sharing and collaboration

The paper finds that professional development is needed to support this improvement but is silent in terms of options for how this will happen and be funded and managed. In addition there is no mention of RTOs and the need for ongoing funding for their professional development. In this connection, we underline TDA's strong support for Reframing the Future, which has contributed a great deal to capability building in TAFE Institutes.

## Qualification design

Section 4.10 covers this very important issue very briefly and makes no reference to the design of units of competency. The four options proposed are very broad and the way forward is not clear. The options proposed are

- Conducting forums for key stakeholder
- Options for use of Statements of Attainment to certify an industry outcome
- Options for RTO input into evidence guides
- Articulating qualification design principles

As part of the *High level Review* ANTA commissioned 10 *Think Pieces* which are on the ANTA website. One was written by TDA and David Rumsey also produced another on the Training Package Model. The training package design issues raised in both papers have not been adequately addressed in the ANTA options paper.

Until the design issues are addressed in terms of a better model, clear guidance and exemplars it will be difficult to make progress on

- Cross industry units which could be a real asset in terms of rationalisation and also a mechanism to make employability skills explicit rather than embedded.. It would be feasible to have well designed units where each industry included their own content and context.
- Comparability of qualifications at different levels across different training packages. This is critical to the integrity of VET sector qualifications.
- Pathways in and out of training package qualifications. The development of clear and consistent pathways with fair and assured credit transfer arrangements is critical for learners. The educational design of training packages and units of competence, particularly how knowledge is specified, needs to be reconsidered to facilitate pathways but this is not addressed in the options outlined in the paper.

A further major area of concern is the failure of the paper to consider the relationship of training package processes and the design and development of vocational courses leading to qualifications that are outside training packages, and to recognise the wide range of situations when accredited courses are reasonably to be preferred by both individual clients and their employers. At present the rules around the development of accredited courses are unreasonably restrictive.

There is a clear ruling that accredited courses cannot duplicate training package qualifications regardless of client needs. The TDA submission to the *High Level Review* referred to the difficulties of attracting international students to undertake vocational courses based on training packages as well as difficulties arising for the emphasis on work based delivery and assessment, especially where TAFE is offering pre employment courses designed to produce work ready, not necessarily competent graduates.

In addition there are issues in areas of emerging employment where TAFE is training for new jobs not covered by training package qualifications and where work experience is

not readily available. The requirement for accreditation applications to develop units of competence to the same level of specificity as required for training packages constitutes a real barrier to TAFE's ability to be responsive to these newly emerging areas of employment. It is often impossible for providers to achieve. But even where compliance is achievable, the requirements may be educationally and occupationally quite inappropriate.

A much better investment in VET quality assurance would be to develop national software for the mapping of accredited course outcomes to national training package competencies. This could be made a requirement of any submission for accreditation and would allow both accrediting authorities and clients to see at a glance the relationship between the two, including the extent to which the course was replicating and/or varying from existing qualifications.