



Response to discussion papers on Training Product Reform and Unduly short courses

Submission to Department of Education and Training March 2018

Introduction

The Australian Chamber welcomes the opportunity to provide input to the Department of Education and Training in response to discussion papers issued on Training Product Reform and Unduly Short Courses. For convenience, we have combined comments relating to these issues into the one document. The submission does not seek to answer all of the questions posed in the discussion paper, but highlights those areas of greatest importance to business.

Training products and competency-based training are cornerstones of the Vocational Education and Training (VET) system. Industry places a high value on the focus on skills outcomes, as defined by industry specialists, as opposed to training inputs. Radical change is not required in relation to training products but further refinement particularly of the development of the products will significantly improve efficiency and responsiveness.

Job-Facing Competency Standards must remain

It is essential that occupational skill standards remain the bedrock of the VET system. The statement in the Case for Change paper that a core principle of the system as an industry led competency-based system based on occupational standards is strongly supported.

Although not explicit in the Case for Change, there has been an undercurrent which infects some of the language in the paper¹ that VET should no longer be focused on skills needed for specific occupations but instead should be more generic. Any reform that seeks this outcome is strongly opposed by industry. Evidence in both VET and higher education shows that vocationally-focused course graduates do better in the employment marketplace than those that have studied more generic courses. Education is a fantastic enabler but a single course is not the sole, or even primary, source of skills throughout a person's career. Even advanced courses such as vet science and medicine in higher education have a practical component as a reinforcement and then followed by lifelong learning, and in VET any tradesperson would suggest that it is the skills on the job that are the most important. However, in order to access those skills and that

¹ For example, table, p13 “..but are sometimes too restrictive on a narrowly defined job outcome”.

experience the graduate needs to secure a job in their chosen field and to do that, they need to present to potential employers with relevant skills for that job. Therefore, it is a job and relevant skills that provide the springboard for future success – not a generalist qualification no matter how many “21st century skills” are contained therein.

Therefore, industry would not tolerate any attempt by other stakeholders to water down the job-facing nature of VET. This strongly stated position does not mean that specific industries may not see the benefit of adopting more common units across occupational qualifications such as the decision taken by the health and community care reference committees. The current system allows for the adoption of this underpinning common skills base where there is evidence that all jobs in that sector will benefit from those common skills. The position also does not prevent the already commenced action to develop some common competency units that could be used across industries.

What's in a name?

It was disappointing that the Case for Change did not address the issue of terminology although it is noted that it is a question contained in the issues for discussion.

The terms “training product” or “training package” do not adequately describe what role these core elements play, and indeed can be misleading. The vocational system is purposely not curriculum based. A system based on skill standards delivers a focus on outcomes and reinforces its practical and relevant approach to modern workplaces. The Australian Chamber has long supported a change of name to occupational skill standards, industry skill standards, or just skill standards.

There is also confusion between the language of training product and training package, with them often being used interchangeably when one is a subset of the other. Even the term accredited course is confusing, as most stakeholders would believe (with some justification) that all approved VET is accredited.

It is recommended that consideration be given to changing the terminology to Occupational Skill Standards instead of training products and Industry Skill Standards in lieu of training packages. Although the term accredited course can be further debated, one option would be “emerging skill standards” to reflect the belief that the only legitimate role for accredited courses not developed by industry is to meet immediate needs not yet incorporated into industry standards. An appropriate period of transition to accept and incorporate the terminology would be expected.

Training product reform vs. development changes

A number of concerns raised by stakeholders against the current system are more appropriately addressed by improving the AISC/IRC development process rather than changing the product itself. That said, there have been comments raised by industry that the product itself has become complicated and dense and would benefit from simplification leaving as the core the skill standards. This issue is not really addressed in the Case for Change.

Other issues, however, are more about process improvement including:

- Better representation of industry on the AISC, including the inclusion of all three peak employer groups concurrently and encouraging the States to nominate members who are

current industry representatives. Related to this, industry must have greater control as to who sits on IRCs. These related issues are targeted at ensuring that the industry skill standards are reflecting the needs of modern workplaces, including to the extent possible future work needs.

- Better information flow to IRCs about how the qualifications in their packages are being used, including issues of quality and misuse.
- Strong and clear guidance to the IRCs from the AISC about how to approach simplification within the packages, the bundling of units into qualifications and the common units earmarked for development, which are or will be available for use within packages.
- Clear and unequivocal reinforcement that the IRCs direct the work of the SSOs and not the other way around, and that the IRCs have sufficient resources to undertake their roles. It was very disappointing to see the allocation of funds to the IRCs significantly reduced due to underspend, when at the same time, many IRCs were seeking more financial resources to support face to face meetings as well as to undertake and inform their work.
- Better resourcing of the work of the IRCs also can in part address the issue of timeliness of the delivery of up to date packages.
- A continued focus on improving the quality of provision. Much of the concerns about training outcomes arise from the quality of the training rather than concerns about the relevance of what is in the training product.

In reviewing the Case for Change, there is a disconnect between some of what is summarised in the table on page 13 described under “New Training product design” and the recommended changes. The Australian Chamber does not agree with some of the characterisation of the “current design” nor is it clear how the changes proposed across the document will achieve what is characterised as “new training product design”. For example, the paper does not clearly set out how the new system will deal with geographical/regional needs in a way that is not available now, or in a way that does not increase the number of qualifications rather than reduce them.

Future Work Skills

Apart from the contextual posturing of the case for change, one of the most significant changes to training products proposed in the paper is the inclusion of a third element within training products to be known as future skills. Although, as a general principle, ensuring that VET includes a range of skills relevant to modern workplaces is supported, there is not sufficient information in the paper to fully understand what would be included in future work skills that is not already included in the subset of foundation skills known as employability skills. Although there has been some further discussion within the joint working party on this issue, there needs to be a lot more work on what is included before industry can properly form a view about adding this important component.

Another option may be that instead of incorporating a third category, an agreed list of future skills is included into the employability skills component of foundation skills.

How will it work in practice?

Generally, (apart from issues around the table on page 13), there is a great deal in the language of the Case for Change that is supported. However, one of the key points raised during the joint working group process and also in consultation with employer groups is the need to understand how the proposed changes would operate in practice without significantly increasing the time and

complexity of development and the cost of delivery. Acknowledging that it is already a requirement for foundation skills to be embedded, what would a training package look like if the changes proposed were adopted? Would the packages be simpler or more complex? Also, what process would an IRC and SSO undertake in order to achieve a useful outcome, and what resources would they need in order to achieve it?

As an example of a particular challenge, although units from the foundation skill package have been available for some time, the implementation of this by providers has been mixed. Often there is inadequate funding available to deliver the additional foundation units that individual learners may require. If the new system requires another additional component and more units including for future skills how will this lack of resources translate to deliver the requirements of the new system? Would it be better to improve the embedded approach, rather than compartmentalise foundation and future skills into their own units of competency? Generally, demonstration of competency in foundation skills will be sufficiently assessed by those skills being utilised within the context of an assessment of delivery of the technical skills.

Any significant change would need to be informed by a pilot or case study using a package and IRC willing to attempt it before any reform is adopted across the system.

Accredited Courses

The increased use of accredited courses is a concern for industry as they are developed either by States/Territories or providers outside of the industry process of skills identification. The role of accredited courses should be narrowed to where they are used only for particular niches and emerging skills which have not yet been picked up in industry training packages. All accredited courses should be reviewed at the next available relevant IRC meeting to assess the merits of inclusion within the industry training package. Accredited courses with a close alignment to existing industry qualifications should not be approved by ASQA. Consideration should be given that ASQA only approves the accredited course after consultation with the most relevant IRC.

Unduly Short Courses

The Australian Chamber was extensively involved in the strategic review conducted by ASQA and played a significant role in identifying an appropriate compromise. Within that context, there is continued support for the ASQA recommendations to be implemented. The most important points from industry perspective are:

- A competency-based approach is fundamental to VET which means that, as a general rule, proscribing time is inappropriate to the determination of whether a skill level has been achieved. That said, there are some circumstances where risks or conditions could warrant a time prescription.
- Barriers to setting duration for particular units or qualifications currently in the training package guidelines and elsewhere should be removed;
- It **must not be mandatory** for IRCs to set durations for any of their packages. The recommendation of the ASQA report needs to stand – that the IRCs on behalf of industry assess the risk and identify whether there is a need for duration to be set for a particular unit or qualification as either mandatory or as a guide to providers. Any mandatory minimum durations set by the IRCs will then be able to be regulated by ASQA.

- Decisions made by the IRCs relating to the need for duration settings should be based on a better flow of evidence from ASQA, NCVER and other relevant stakeholders.

Summary

At a recent meeting, members of the Australian Chamber delivered a very strong message about training product reform – more technical skills not less. This appropriately summarises the position that employers continue to see the strength of VET as the delivery of relevant technical skills suitable for modern workplaces. These technical skills will inevitably need to be complemented by non-technical skills that are essential to demonstrate competence. It is also acknowledged that it is, in many cases, the non-technical skills that will set the worker apart from machines in the performance of tasks both now and in the future. If an appropriately resourced and industry-representative IRC is doing its job, it will properly identify the skills, both technical and non-technical, needed to perform productively in modern workplaces.



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