

13 July 2020

Ms Ingrid Ottaway
The Productivity Commission
Canberra

Email: skills.workforce.agreement@pc.gov.au

Thank you for the opportunity to respond to your requests for information as part of the National Agreement for Skills and Workforce Development Review.

Our submission draws on our expertise in online delivery and educational consulting in the vocational education training sector. Accordingly, we address your requests for information on:

- *What is the scope to increase the use of fully online delivery of VET, with what advantages, risks and policy challenges?*
- *To what degree could accreditation be separated from training?*
- *What types of training are most suited to innovative models of training?*
- *What actions would governments need to take to maximise the potential for the adoption of innovative delivery of training or new types of training?*

Our response is in two parts: online delivery and the separation of accreditation and training.

VETASSESS is Australia's largest provider of skills assessment and provides educational consultancy services around the world. We are owned by Bendigo Kangan Institute and, with our online learning arm eWorks, have recently been providing fully online training as part of the Victorian Government's response to the COVID-19 pandemic.

eWorks specialises in online learning and development and has created online learning for Bendigo Kangan Institute, the University of Queensland and the Royal Australasian College of Surgeons. It is currently working with the Institute for Drone Technology to incorporate augmented and virtual reality into training for pilots to operate drones.

Yours sincerely

Rob Thomason
Executive Director



The VETASSESS response

Online delivery

The review asks for more information on:

- *What is the scope to increase the use of fully online delivery of VET, with what advantages, risks and policy challenges?*
- *To what degree could accreditation be separated from training?*
- *What types of training are most suited to innovative models of training?*
- *What actions would governments need to take to maximise the potential for the adoption of innovative delivery of training or new types of training?*

1. What is the scope to increase the use of fully online delivery of VET, with what advantages, risks and policy challenges?

Online delivery enables training organisations to respond effectively to student and industry demands for flexible and continuous learning.

If the VET sector is to meet the demand for training, it will not be able to rely on conventional classroom-based modes of training delivery – it will need to develop its capacities to deliver online. However, this does not mean simply using online tools to deliver existing courses – investment will be required to design programs that are intended for online delivery.

It is our experience that a mix of online and face-to-face learning is most suited to VET courses, although we have recently developed fully online courses in response to the COVID-19 pandemic. As the Commission has noted, some skills cannot be taught online and many VET students value face-to-face learning with teachers and instructors who have industry experience.

Designing for online delivery

Programs need to be designed for online delivery and cannot be just adaptations of face-to-face delivery programs. If they are done badly, the student has a passive experience and is likely to become disengaged from the program.

Factors that enable successful online delivery are:

- Making the learning more interactive – instead of presenting to the students, as if they were listening in a classroom, online learning should require them to find the answer themselves.

- Rather than “retrofitting” a face-to-face program to online delivery, the course needs to be redeveloped to make use of the platforms and learning technology available to the institution. This will make it a cohesive experience for the student rather than one that seems piecemeal .
- The online experience should encourage collaboration between students. This may be through forums, learning activities done together or as part of a small group or with different groups each contributing part of a whole.
- Design must enable learning on multiple devices: mobile, laptop and desktop.
- Students must have the ability to provide feedback and course evaluation, so trainers understand what is working for learners and where there may be issues to address.

We have seen online learning falter when:

- There is inadequate consideration of technology limitations for rural and regional learners. They can face limits on bandwidth that prevent them from doing tasks. This has become less of an issue in the past five years, but it still needs to be taken into consideration.
- Technology is not WCAG compliant, meaning it is not accessible to some students with disabilities.
- There is too much emphasis on one form of online learning. Not everyone learns best by reading on the page. Effective online learning will use a mix of teaching technologies. Online does offer video and audio options.
- Not enough consideration is given to the different platforms, so content cannot be accessed via tablet or mobile phone. A “drag and drop” type activity that can only be done by someone using a mouse will not be completed by someone who doesn’t have easy access to a desktop/laptop.

Training the trainers

Trainers also need to be taught how to use e-Learning, whether it is blended learning or fully online.

There is an emerging market for providing support services for online learning. Both teachers and support staff will likely need training to deliver online learning.

This should cover not only the design of online learning but how teachers can develop and maintain their course content.

Any support service should offer:

- Fundamentals of digital teaching and learning – for teachers delivering online or blended
- Designing for digital teaching and learning – for teachers maintaining/developing online content



- Excellence in digital teaching and learning – for mentors and digital leaders

Content development

Providers are shifting rapidly towards blended-online delivery - and this has been accelerated by COVID-19. However, content development is time and is resource-intensive for providers. Many lack the skills required.

Training materials need to be continuously renewed as markets and training packages evolve, and these updates are costly. Individual institutions can lack the scale and resources to do this effectively, which places the burden on government.

One option is to provide subscription content for training organisations to subscribe to programs with developers who provide content. The providers are responsible for updating content and developing the technology to deliver it. This enables training institutes to overcome investment barriers and facilitates more effective scale-up of online delivery.

Government ownership of developed content could provide a more effective model for the initial development but also the maintenance, renewal and dissemination of core content to lift compliance with standards across the sector. A licensing model would provide a user pays model where the fees received could be used to develop new content and maintain existing content.

The current online content market is fragmented, and existing players serve specific customers and content niches.

Recommendation:

That consideration is given to governments establishing a centralised service to develop online learning content. This would be made available through a licensing regime.

2. Accreditation and delivery

VETASSESS has more than 20 years' experience in assessment for accreditation purposes.

We provide independent assessment for migration purposes (for both professional and trade occupations) and also for accreditation to industry bodies such as the Psychotherapy and Counselling Federation of Australia (PACFA) and for people who require a comparison of their qualification(s) to the Australian Qualifications Framework to support an application for licensing as a financial adviser by the Financial Adviser Standards and Ethics Authority (FASEA).



We also conduct independent validation of assessment for the Victorian Government under a [pilot program](#) to support the quality of apprenticeship and trainee training.

In our view this form of assessment can provide consistency to VET outcomes and would be valuable in an accreditation system independent of training institutes. In the UK and Germany, forms of independent assessment are mandatory to gain accreditation in some trades. We believe this approach could be adapted to Australia.

What is independent validation of assessment

Independent validation of assessment is a mechanism for assessing proficiency in an occupation. It is conducted independently of the training provider that has taught the graduate. It can be conducted for apprentices or trainees who have completed training or who are near to completion.

The assessment may be held at the graduate's workplace or their training institute but is conducted by an assessor who has worked in that trade but has no involvement with that workplace or institute.

The Commission is aware of criticism in recent years about the quality and consistency of VET training. The 2019 *Expert Review of Australia's Vocational Education and Training System*, commonly known as the Joyce Review, found employer confidence in the sector was declining and student numbers decreasing.

The Joyce Review said improving quality in assessment would be an important step in improving quality in VET, noting some industries overcome assessment concerns through the independent validation of a person's competencies at the end of the course.

What makes for successful assessment?

Our experience is that independent validation of assessment is successful when it has industry "buy-in" and there is genuine consultation with industry groups, so they support the mechanism and outcomes.

A mandatory system of independent validation will restore confidence among learners, employers and industry. It will become part of the journey for apprentices and trainees aspiring to work in a VET occupation and training institutes will be able to use feedback from assessments to measure their performance.

Recommendation

That the Commonwealth, state and territory governments collaborate to introduce a mandatory system of independent validation of assessment that would be a prerequisite for accreditation to practise in a trade.



This could be introduced with a pilot, but the aim would be to introduce a national accreditation system. A national certificate of proficiency would assist the movement of labour and give employers greater confidence in hiring individuals with qualifications gained in another state/territory.

We would welcome the opportunity to discuss this further.
