

9 July 2015



Australian Government
Australian Skills Quality Authority

Mutual Recognition Schemes
Productivity Commission
Locked Bag 2, Collins St. East,
Melbourne, VIC 8003

Dear Commissioner

I am writing to provide some observations in relation to the draft report prepared by the Productivity Commission on Mutual Recognition Schemes as published on 26 June 2015.

The Australian Skills Quality Authority (ASQA) is the national regulator of vocational education and training (VET) in Australia, currently regulating almost 4,000 registered training organisations (RTOs).

While ASQA does not have a role in licensing arrangements per se, it does have an interest where such schemes rely (in whole or in part) on nationally recognised VET qualifications.

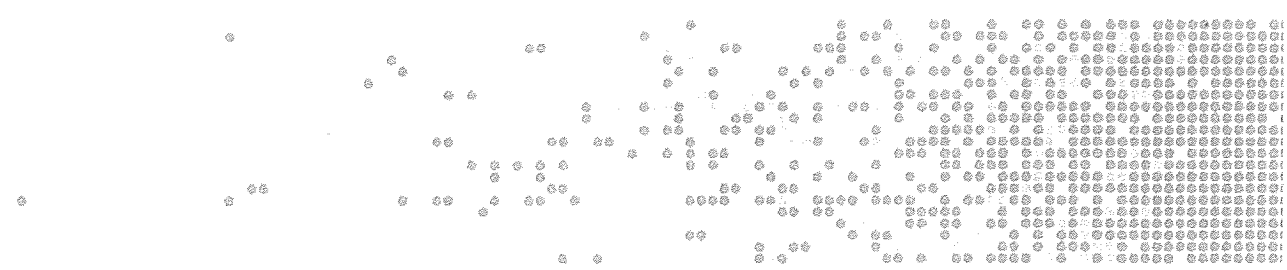
ASQA is particularly aware of concerns with respect to licensing for the security industry – an issue addressed in the Productivity Commission draft report.

As noted in the draft report, ASQA has, based on concerns expressed by jurisdictional security licensing bodies and successive reports by Coroners investigating deaths resulting from the actions of security personnel, undertaken a strategic review of training for the security industry. It is expected that report, including a series of recommendations, will be published later in 2015.

I also note the draft finding 5.2 and draft recommendation 5.2 in the report related to harmful security licence 'shopping and hopping' and comments about the quality of the training and assessment provided by some RTOs operating in this sector. I agree with the observation that issues related to the quality of VET are properly responded to by ASQA and, as evidenced by this strategic industry review, ASQA is actively directing its regulatory resources to those areas of highest risk.

While the recommendations of that strategic review are yet to be finalised, it is fair to say that, across the entire VET sector, ASQA is concerned about the suitability of some training products, in particular those defined in national training packages.

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ASQA is of the view that training package products need to provide greater clarity within qualification specifications. For example, ASQA has ongoing concerns about training programs being delivered in very short timeframes. The clear risk is that learners do not have sufficient training to ensure they are gaining all of the required skills and competencies of the qualification. ASQA has come to the view that qualification specifications need to be explicit about the volume of learning a student must receive to be awarded the qualification.

Other examples where the training product must be strengthened include, where relevant, specification of appropriate learning pathways (for example, detailing where on-line delivery is not suitable or where work placement is mandatory).

ASQA also strongly believes that training package products must provide more detailed assessment specifications.

Equally important is that key stakeholders, such as licensing bodies, are meaningfully engaged in the design of the qualifications to be used for licensing purposes. It is critical that licensing bodies reach agreement about the skills and competencies people need in order to be issued with a licence.

By ensuring that the training product itself is fit for purpose, the RTOs delivering the qualification have clear specifications to meet in the design and delivery of their training and assessment.

From ASQA's perspective as the National VET Regulator, where a training product is explicit and a RTO has failed to meet those clear specifications, ASQA is able to take strong regulatory action. In cases of critical non-compliance, that action can include the severe sanction of the RTO losing its registration. Indeed, ASQA has established a track record of responding to poor provider performance having made 86 decisions to cancel registration, refused 141 applications to renew registration and refused 147 applications from training organisations seeking to become registered.

While ASQA is not the body that endorses national training packages, it made a submission to the recent Review of Training Packages and Accredited Courses undertaken by Senator the Hon Simon Birmingham, Assistant Minister for Education and Training and is continuing to work with key stakeholders to ensure that issues such as those identified above are addressed.

Yours sincerely

Christopher Robinson
Chief Commissioner and Chief Executive Officer