

Review of the Skills and Workforce Development Agreement (NASWD)
Productivity Commission
GPO Box 1428, Canberra City, ACT 2601

Dear Commissioners Coppel and Roberts

Please find attached a copy of a publication that considers in detail 'transparency and accountability' in the national vocational education and training (VET) sector.

I anticipate this will soon be published in Campus Review. As such, please appreciate the attached is written in a length and style for this journal.

My request is that you accept it as a late submission to your Review as it covers, in consolidated manner, an important element of national VET policy relevant to your review of the NASWD, a finding your Interim Report has already highlighted.

I make this submission trusting it may be of use, being aware your Final Report is nearing completion.

Subject to your decision alone, I agree this late submission can be published on your web site.

Yours Sincerely

Dr J Craig Fowler
Director JCSF Consulting Pty Ltd
19 Nov. 2020

VET Transparency & Accountability More Fallacy than Fact, or ‘When All Else Fails, Tell the Truth’¹

This article concerns ‘transparency and accountability’ in the national vocational education and training (VET) sector. The theory is that transparency begets accountability; that stakeholders make better decisions if better informed; and in aggregate this has quality and efficiency benefits. This analysis shows that the VET sector is neither as transparent nor as accountable as it could, or should be, and remains opaque to many.

The narrative is unfolded in three parts: first, a summary of policy statements signed off by governments espousing ‘transparency and accountability’ in the VET sector, also outlining inherent limitations. Secondly, explaining by example why current practice falls short of aspiration, with reference to international practice. Lastly, a more radical yet plausible transparency and accountability regime is outlined, as despite a growing wealth of data and information, reform lethargy has stunted optimal leverage of many potential benefits.

Transparency and Accountability – Aspirations and Limitations

The standard economic rationale is that information asymmetry erodes market efficiency. Markets work best if all stakeholders (in VET’s case e.g. students, employers, industry) have readily available, fulsome, easy to understand, and up to date information on which to base their decisions². Publication of decision-useful information and deeper analysis of trend data then drives - in theory - well evidenced reforms³.

Governments’ aspirations for VET transparency and accountability are best summarised within national policy statements (Table 1). The first two listed are signed off by *all* Australian governments, given the VET sector works under a shared ‘[cooperative federalism](#)’ governance. The third listed is ‘in re-draft’.

Table 1: Extracts from source documents explicitly referencing ‘transparency’ or ‘accountability’

Source	Summary Statement(s) of Intent
National Agreement for Skills and Workforce Development 2012 (NASWD) 2009 updated 2012	This Agreement embodies a shared vision for reform that addresses issues of access to training for all working age Australians, the ready availability of information that students and employers need to make informed choices and decisions about training, the quality of training delivery and the accountability of governments for outcomes from the national training system..... Provide greater transparency through better information to ensure consumers (students and employers) can make informed choices, governments can exercise accountability and policy-makers and regulators can understand and respond to emerging issues
Heads of Agreement for Skills Reform 2020 (First Ministers)	Enhancing transparency and accountability , through clear roles and responsibilities for governments and industry, and increasing data collection and analysis that is shared publicly to support regular assessment of governments’ policies and performance.
VET Reform Roadmap – consultation draft 2020	Develop a monitoring and reporting framework to improve transparency and accountability The system provides a high degree of leadership, quality, stability, transparency and accountability to meet Australia’s skills needs and reflect the shared responsibility of governments.

Setting the boundary lines between ‘public’ vs. ‘confidential’

There are rational and legal limits to making all information public such as [personal privacy](#) constraints as well as areas of [commercial-in-confidence](#). That said, the formal VET system/market is created, largely funded and fully regulated by governments. This immediately creates unique dynamics and obligations of public accountability. Where and how harsh the ‘light’ of transparency and accountability shines depends on who’s being put in the spotlight and at what ‘benefit/risk’. If students and employers are regarded as ‘consumers’ then information to help them make better decisions is sound. Progress has been made in this regard, including the likes of the [National Careers Institute](#). Things get more complex in shining a light on say the relative performance of Registered Training Organisations (RTOs), or say employers of apprentices. It gets

murky when governments themselves espouse accountability (Table 1) because they are also the ‘gate keepers’ of information. They set all the rules on VET information collection, access and public disclosure. In so doing they can be conflicted having one eye to (politically) risk-managing disclosure of content and performance relevant to their own performance accountability. And lastly stakeholders would rationally expect consistency in transparency between the VET and Higher Education (HE) sectors in any coherent tertiary system.

Any pushback by governments is partly counterbalanced by in built alternate processes for public scrutiny such as parliamentary estimates, independent auditors, independent regulatory bodies, ombudsman etc. and even investigative journalism. Recall the debacle of the [VET FEE HELP saga](#) and at least \$1 billion ‘lost’ public funding. That said, there are instances where information should be confidential to government, and also many sound examples where reviews of VET programs/initiatives include public consultations and reports.

So the ideals of ‘transparency’ are mutable in the face of ‘revelation and reputation’ risk. For example: for students (e.g. ‘name and shame’ in academic non-integrity), for RTOs (e.g. poor quality), for employers (e.g. bullying of apprentices), and for governments (e.g. waste of public monies). Drawing policy lines on what’s public, what’s not, and what’s fair and balanced is not simple - but the present lines are way ‘out of whack’.

Transparency and Accountability – Practice and Shortfalls

Example 1: Access to and public release of VET data

The line of legal authority in making VET data public stems from the *National Vocational Education and Training Regulator Act 2011* and its related Legislative Instrument covering [Data Provision Requirements 2012](#)⁴. This requires RTOs to: ‘obtain’ (collect) and ‘submit’ Australian VET Management Information Statistical Standard (AVETMISS) compliant data; to provide ASQA with RTO-specific business, probity, training and financial information; plus annual ‘quality indicator’ student surveys data. This instrument links to a next lower tier of administrative governance approved by training Ministers. This is the [National VET Data Policy](#) which *inter alia* details matters of collection, privacy, access and disclosure of data. You need to get to these weeds to see a root cause issue in ‘identified RTO’ data in Clause 11.5 of this Policy.

“11.5 Identified RTO level VET Outcome Data and VET Funding Data may only be published by governments, following agreement of Senior Officials responsible for VET in the Commonwealth, states and territories. The publishing jurisdiction is responsible for ensuring adequate consultation with VET stakeholders, ensuring compliance with data use and legislative requirements, and deciding in what form to publish data...”

VET Outcome Data includes: Student Outcomes Surveys; Surveys of Employers’ Use and Views; Apprentice and Trainee Destinations Surveys; and Identified (named) RTO level (course) completions data. VET Funding Data includes the (ex) National VET Finance Collection and National VET Funding Collection (new from 2018). Governments have access to their own provider specific data and can agree to share with other jurisdictions. ASQA, via the Legislative Instrument, also has RTO-specific information about its business and financial standing, ‘fit and proper’ status of its principals, as well as annual ‘quality indicator’ student surveys.

All others who may want identified RTO data may choose to ask the [VET Data Access Committee](#) which gives advice on disclosure of any identifiable data, including ‘whether the commercial interests of the identified RTO may be compromised’. Such requests might be assessed as; credible public interest research, or, compiling commercial market intelligence; and all shades of grey in between. Little is published.

Students will also not find on [MySkills](#) any detail of *provider-specific* student surveys: neither the ‘quality indicator’ surveys of enrolled students collected by RTOs for ASQA; nor [Student Outcomes Survey](#) data typically collected some six months post their graduation and linkable with the RTO at which they studied.

Compare HE disclosures via the [ComparEd](#) website displaying a wealth of [QILT data](#) at *provider level*: current student experience; recent graduate satisfaction; and recent graduate employment and salary. It displays inter-institutional comparisons to 'help users make informed decisions about ...their future study' options'.

Example 2: Publication of program/course completions data

Neither will students find on [MySkills](#) any *provider-specific* course completion rates for nationally recognised VET programs. This is despite there now being five years of Total VET Students and Courses data; that there is [statistical robustness in predictive completion rates](#) (to deal with students taking different durations in going from 'start to completion post'), and that [statistically validated minimum numbers of enrolments](#) in any individual course can be set (to deal with 'there are too few enrolments' argument). Yes - completion rates are not the 'all defining' quality measure, but they remain valid for the bulk of VET activity, especially the [nationally recognised program enrolments](#) subsidised by governments.

So what of any HE transparency? The national [HE Data Protocols](#) operationally allows *provider-specific* publication of course completion rates, bureaucratically blocked by the [National VET Data Policy](#). The tables of Completion Rates for HE students – Cohort Analysis 2005-2019 for universities and non-university higher education providers (NUHEPS) include at least institutional completion rates [at a provider specific level](#) (see tabs T10-T12 for NUHEPS). This includes all TAFEs who are NUHEPs – a bizarre policy inconsistency.

What of apprenticeship (trade or non-trade) completion rates? There is no easy place students can look for *employer-specific* contract completion rates. Nowhere is there public prominence given to high quality exceptional employers who may have for many years taken on and nurtured successful apprentices. They indeed deserve to be better recognised. Conversely only the States who run contracts of training know which employers have track records that students should avoid (and industrial tribunal data is of little help).

Whilst there are multiple employer/student reasons for apprentice non-completion, if students knew where to look they would discover that course and contract completion rates ([July 2020 data](#)) for apprentices and trainees commencing in 2015 were: course completion 56.2% for trade occupations and 57.7% for non-trade occupations; and; contract completion rates 43.8% for trade occupations and 54.9% for non-trade occupations. So roughly half or less of students never complete either a qualification or contract. This is a poor track record, made more challenging in the post-COVID business environment, where Government has – albeit with good intention – [piled an additional \\$1.2 billion](#) on top of this already inefficient system.

In summary, Clause 11.5 shows governments as the risk-managing 'gate keeper'. On behalf of Ministers, Government officials at a jurisdictional level have to agree whether or not information is made public about critical *provider-specific* outcomes and performance. Present policy means very limited and often woefully incomplete 'RTO volunteered' information appears on MySkills, the intended national 'go to' site for students to help them select a preferred high quality training provider. This suggests most training providers would not regard MySkills as being in the 'front line' of their marketing efforts.

So what do other nations do?

Example 3: Practices in the UK, USA and NZ

These web-site examples are built to serve a mostly comparable audience to that of MySkills. Below is a text extract of an example routine inspection report of a [named UK education provider](#) accessible to students/parents (its bracing content is not something Australian VET Senior Officials would release!):

- *The proportion of apprentices who successfully complete their apprenticeship has fallen since the previous inspection. Too few who complete their apprenticeship do so within the time planned.*

- *Teaching, learning and assessment are not of a sufficiently high standard to enable apprentices to make good progress. Senior leaders have not taken the actions necessary to redress a decline in the quality of teaching, learning and assessment.*

This is taken from a summary page of an [Ofsted Report](#) (UK Office for Standards in Education, Children's Services and Skills) a resource of compiled inspection reports for schools, colleges, and children services. The example is from the further education and skills provider category. Ofsted 'headline rate' all service providers under four quality categories: Inadequate; Requires Improvement, Good, and Outstanding. There is a well-functioning site for [comparing schools and colleges](#) within which the Ofsted reports are embedded.

In the USA, the [College Scorecard](#) covers the full span of tertiary education providers, universities and training colleges giving students a means of [scanning and selecting a college](#). It will [typically indicate](#) provider-specific data such as location, business basis e.g. private/profit/non-profit etc., enrolments, entry test scores, full and part time students and socio-economic diversity, ranked fields of study, first year attrition and course completion rates, annual cost, loans and monthly repayment, and salary post- graduation. These data are extracted from a data warehouse run by the US Department of Education.

Both in the UK or US examples, students are expected to make [deeper due diligence](#), but website information and presentation is far better, more comprehensive and more revealing than present VET policies and practices allows in Australia. The UK example also puts all providers on sharp notice by publishing graded inspection reports detailing their education and training quality. Top graded reports are good for marketing.

This approach of publishing independent audit reports is used routinely in other services industries. For example NZ citizens readily access NZ Ministry of Health site audits when selecting [residential aged care](#).

Such UK/USA/NZ examples illustrate a critical principle of balance: content must not be dumbed down to 'trip-advisor' style social media impulses, nor be excessive, confusing and boring. Standardised, credible e.g. independent, intelligible and easy to navigate provider-specific information gives consumers consistent information about service excellence, to which providers strive, as well as giving public notice of the bad.

Returning to Australia, ASQA inches forward in public disclosures as a result of [recent legislative change](#) arising from the [ASQA Rapid Review](#). It has taken till near ASQA's 10th birthday for policy makers to allow the following to be included on the National Register to increase public awareness (*implementation date*):

- Adding business and contact details about an RTO to the National Register (*1 September 2020*)
- Publishing and retaining any historical regulatory decisions concerning an RTO (*1 September 2020*)
- Publishing adverse regulatory decisions at the time of decision i.e. not post appeals (*1 March 2021*) including decisions that impact RTOs such as [conditions, suspensions or cancelations](#).

Whilst not built for public purpose, the confidential 'Provider Risk Assessment' reports prepared by TEQSA about HE providers are in style akin to UK Ofsted reports. These reports show multi-year 'traffic light' risks across 11 indicators including: Student Growth; Attrition Rate; Progress Rate; Completions; Graduate Satisfaction; Graduate Destinations; Senior Academic Leaders to Broad Field of Education; Student to Staff Ratio; Academic Staff on Casual Work Contracts; Financial Viability; and Financial Sustainability.

There are then model reports to build on. Policy willing, RTO reports could easily be designed and published⁵.

Example 4: Decline in support of VET quality and profession standing as a 'National Training System (NTS)'

This example concerns [Clause 15 of NASWD](#) - Funding to Support the National Training System:

15. All parties... agreed to the quarantining of the National Training System Commonwealth Own Purpose Expenditure (NTS COPE) from the NSPP each year. The amount⁶ is specified in the relevant Commonwealth Government Portfolio Budget Statement which in 2011-12 was \$47.201 million, and is indexed annually.

The historic purpose of Ministers was to ‘quarantine’ funds for specific functions and projects to benefit the ‘national training system’. Legally it is a COPE i.e. Commonwealth Own Purpose Expenditure under the relevant Commonwealth agency. The NTS prefix reflects investment in ‘cooperative federalism’. Ministers historically wanted to support national projects e.g. VET professional practice in teaching and ‘e-learning’.

The NTS-COPE is presently not and seemingly has never been indexed⁷, apparently an example of ‘agree one thing, yet do another’. Had it been indexed since 2009, it would now be worth ~\$60 million p.a. Had governments determinedly and cooperatively pursued VET quality and professional development, the sector may now be in better repute. As further evidence to this, there has been a nine year gap between a 2011 Productivity Commission (PC) Report and a 2020 NCVET Report on simply surveying RTOs about employees and their professional standing, [basic information about numbers and qualifications](#). Clauses 1.13 – 1.16 of the [Standards for RTOs](#) sets standards for qualifications and evidence of contemporary industry skills for trainers and assessors. ASQA would normally seek evidence of this at any RTO audit, yet none is made public.

Example 5: National Agreement for Skills and Workforce Development – Subsidy setting and funding

The NASWD is subject of ongoing review by the PC whose [interim summary report](#) states:

INTERIM FINDING 4.4 — LACK OF TRANSPARENCY IN SUBSIDY SETTING There is a general lack of transparency on subsidy- setting processes and the rationales for subsidies. There is also a lack of transparency on course costs faced by students. This transparency deficit adversely affects the ability of students and training providers to make informed decisions on investment in training.

This has been brewing ever since the NASWD was signed off. There are two elements. The first is NASWD and its funding National Agreement (NA) had no [‘maintenance of proportional funding effort’](#) obligations. Whilst Australian Governments have consistently indexed the NA funds annually since the start of the NASWD ([to now be ~\\$1.6bn](#)), sustainability of VET funding has been wrecked by (most) State Treasuries in not maintaining their proportionate share, nor indexing funds (it was never written in so was not enforceable).

The second is that States and Territories took very [different approaches to setting and amending student ‘entitlement’ policies and course subsidy regimes](#). This manifest in a lack of consistency across jurisdictions with regards to courses subsidised, the level of subsidy, rights of access, exacerbated by abrupt policy changes, and VET funding fluctuation and decline. Over the last decade, they neither made fully transparent, nor sought to harmonise, VET entitlement policies and subsidy settings. These matters were rightfully called out in “Strengthening Skills, Expert Review of Australia’s VET System” (the [Joyce Review](#)) and reinforced in the PC’s Interim Report, illustrating subsidy and price variation across jurisdictions for the same national qualifications.

All this has now come back to bite the States and Territories. Rather than fixing flawed transparency and accountability, the Joyce Review proposed [‘simpler funding’](#) and argued for centralised decision making by a National Skills Commission (NSC) responsible for establishing nationally averaged and consistently subsidised VET course costs and student ‘out of pocket’ expenses, even though States still [constitutionally](#) control VET training. The Joyce proposals were viewed by the States as removing/limiting their ability to decide for themselves policies and operation of their own VET systems and so got the [predicted strong push back from all jurisdictions](#) as evidenced in their submissions to the PC. The Joyce Review also completely [failed to address](#) sufficiency of public VET funding, the role of publicly financed training loans, HE vs. VET sectoral funding inequities, and short course funding, and so these issues have now been scooped into the PC’s Review net.

Transparency and Accountability – Practical Plausible Reforms

First Ministers have agreed a '[shared responsibility for VET](#)' and signing off a [Heads of Agreement for Skills Reform](#). Their short term focus is a training response to the COVID pandemic. Their future agreement to the detail of any new NA/NASWD will be informed by the pending PC's Final Report. Consider for now three 'Heads and Agreement' statements with a laser focussed 'transparency and accountability' lens. These are:

'Adopting a new funding model that improves national consistency for students, integrates subsidies and loans and is linked with efficient pricing and the skills needed by employers'

'Work with the NSC to develop an approach to estimating the costs of delivering trainingto share data that will enable the NSC to release efficient prices for common VET qualifications by 1 July 2021 and all VET qualifications by 1 July 2022...sharing data on costs of delivery, student outcomes and provider performance'

'Simplifying, rationalising and streamlining national VET qualifications across industry occupation clusters and the Australian Qualifications Framework (AQF), and introducing improved industry engagement arrangements'

Taking these statements as a whole, here are options for 'do-able reforms' to transform rhetoric to reality.

Governments to show leadership in demonstrating accountability

If a [federated cooperation model](#) is to work it must be founded on 'subsidiarity with accountability'. States and Territories would be funded under bilateral agreements proportionate to what they invest. Run on an annualised basis, if they don't keep up with Commonwealth's indexed funding, others States could draw on unallocated NA funds where they exceed their bilateral share. Outcomes will be published annually.

VET sector funding must be designed as part of a national tertiary system, within a public funding/financing framework that connects and integrates the differing yet complementary HE and VET sectors. Students must get fair and equitable access to post school education and training, and opportunity to move across sectors based on merit and equity, so eliminating funding as a current major determinant of student choice.

Unless constitutionally changed, there will always be an overlap junction between HE and VET, where one government controls policy and resourcing vs. multiple jurisdictions⁸. This makes design of any expanded income contingent loans (ICL) critical (whether run by one government or jointly). The now [separate VET-student loan debts](#) (from those of HE-HELP) must encompass publication of *all* government(s) liabilities in VET financing, cumulative debt, any shared liabilities, or student debt write offs across government(s).

RTOs to step up to a new transparency regime

The present [Data Provision Requirements 2012](#) must be amended. Instead of now in effect saying: 'RTOs must collect and submit compliant data' it will say: 'if you want to operate as an RTO you collect and submit data, and, will also have RTO-identified data published, including student outcomes data, student surveys data, pricing of courses (whether publicly subsidised or not) and also attest to RTO business sustainability'.

RTO-identified student outcomes data would then be made public in a consistent well-designed template. Its content must be easily understood by students and employers. It will summarise an RTO's essential statistics, courses, student outcomes and surveys, with links to prompt posting of critical compliance issues. The content and styles of international and other reports (see above) serve as template examples.

Content would not breach the *Privacy Act*, nor overreach into sensitive commercial-in-confidence⁹ information.

Public disclosure of course prices will be expected by all RTOs

It follows RTOs would also have to publish and maintain on their websites a list of all their courses with their course pricing. This would include for each course details of any government subsidises by grants or loan access and/or student 'out of pocket' costs, with all this compiled on a standardised template. Students will then have a clear and consistent basis of making price comparisons between RTOs.

If RTOs balk at any of the above, their exit will remove from the VET regulated system those RTOs shy of publishing their status, performance and pricing. Is this too onerous? Not if you look at NBN Co and the fleet of NBN broad band retail providers who all have to make public disclosure of product, price and performance under Australian Competition and Consumer Commission ([ACCCs](#)) oversight. Not if you take serious obligations to [fairly display and disclose prices](#) under the *Competition and Consumer Act 2010*.

All this will flip the present non-disclosures of RTO-specific information, now shielded by bureaucrats, to a default of public disclosure¹⁰. To minimise RTO burden, all pricing data can then be 'scraped'¹¹ by a central authority e.g. NSC, or submitted quarterly with routine VET course activity collected by the NCVET¹². Do this and a valuable trove of better connected data to enhance VET system accountability opens up.

Transparency in pricing will be linked with provider-specific course and student outcomes

The [NSC now states](#) it "will provide research and analysis on the development of efficient prices for VET courses..." It is not yet clear if the Australian government (as strict condition of new NA funding) will *impose* nationally uniform pricing¹³, or, whether NSC data compiled in cooperation with States will serve as price benchmarks allowing States to retain their own pricing. This is likely an ongoing 'arm-wrestle' of detail.

Most valuably, the NSC acknowledges that '[an efficient and effective price is one that promotes quality teaching and creates job ready candidates. Not just the lowest price](#)'. Routine and dynamic collection of RTO course pricing data will then allow comparative analytics: per course, per provider, linkable to provider-specific student outcomes. This gives granular data to oversight quality with reference to efficiency of delivery, including evidence of quality/cost of public providers and any community service obligations.

Whilst theoretical 'ground-up-desk-top' cost estimates may inform inputs, there is no rationale for course pricing being *exactly* the same across the nation as costs are clearly not the same. If governments commit to assembling provider-specific price data, the NSC would be able to analyse prices and public subsidies for all courses and student fees. The NSC's value would then be in a 'system monitoring, assessment and verification' role of governments' accountability to the terms of any new NA/NASWD. Like the [ofqual \(UK\)](#), the NSC could publish annual qualification price index changes so taking on features of an [independent pricing tribunal](#) examining for exceptional price movements. States/Territories could determine their own priority courses and subsidy levels, but held accountable by a new NASWD to explain course alignment to local jobs/skills needs and 'exceptional to benchmark' pricing variations - subsidiarity with accountability.

Data would also allow estimates of student 'fees and charges activity' and 'fee for service' contributions made to national VET funding. 'Out of pocket' costs are important to students, yet governments inexplicably [removed this from scope](#) in the new Government VET Funding Collection, reflecting poorly on their own accountability.

Full details of Australia's VET 'provider and product market structures' will be published annually

First Ministers committed to 'simplifying, rationalising and streamlining national VET qualifications' tasking the NSC to 'release efficient prices for *common* VET qualifications by 1 July 2021 and all VET qualifications by 1 July 2022'. What are 'common' VET courses, and why so?

Research showed some ~1,577 available courses in 2016 in the national VET system with [93% of enrolments in only 21% of qualifications](#), a vast skew in course utilisation, and 20% of qualifications with no enrolments which makes ‘pricing’ them pointless. Proliferation in course numbers is also contrary to international trends in consolidation of courses into vocational streams with more deliberate focus on [students gaining transferable 21st Century skills](#). Notably, it was the Joyce Review that advised the establishment of Skills Organisations (SOs) to become responsible for developing courses so placing industry at the centre of the VET sector. There are [three SO pilots](#) in operation. If it is assumed SOs have their basis in the NZ Industry Training Organisations (ITOs) model, it is notable that following a [wider VET review](#), the NZ Government has legislatively removed them and are now [transitioning ITOs](#) out of their education and training landscape.

So, in order to put a new ‘bright light’ on national VET ‘product and provider’ market structures, governments need to endorse an annual publication that details VET qualifications, development and use in training. It should include output metrics for ‘development and update’ of VET qualifications, giving evidence (not anecdote) to the performance of any contracted industry-led bodies (e.g. ISCs/SSOs or SOs) responsible for such tasks. The Australian Government would then have to step over past ‘contract-in-confidence’ reasons for non-disclosure. The report must also detail the national provider RTO market including numbers, mergers and exits, explaining why Australia seemingly has such high RTO numbers¹⁴ [compared with others nations](#).

Employers and industry investment in VET also needs to be made public and accountable

The ‘too hard basket question’ is: how much is industry and employers collectively investing in the VET and how can this be clearly defined and efficiently measured? If investment by governments is to be publicly accountable, what is the net (after government funds paid to industry) that employers contribute to VET, and, are any of this funding displacing what industry should more reasonably be expected to fund themselves?

Summary

If lifting VET’s quality is a core objective, a reasoned balance needs to be struck between VET information disclosure and confidentiality. At present the system is skewed to non-disclosure. Governments, seemingly for their own risk averse and wrong-headed reasons, have been outright squeamish in making public provider-level VET outcomes data. Whether bureaucratic authority is actively exercised or not, how else can the present ‘gate-keeping’ policy be explained, if not either an unwillingness to stare down past RTO industry preference to block such disclosures, or governments risk managing their own accountability as policy makers and funders? The divergent practices of provider-specific transparency in HE compared with VET serves to confirm this.

Policy in VET needs to be ‘flipped’ on its head by making provider level data the norm, including especially course prices, subsidies/financing and student fees. The present legislative instruments and policies need to be re-written empowering new transparency and accountability. When in place, templated RTO summaries can be made public by national regulators and/or via a fully reconceived and rebuilt MySkills, or other better means. Governments’ rhetoric needs credible reform actions. They alone set the rules and means. It is in their powers to change policy, to demonstrate new standards in self transparency and accountability in their own dealings and data, and to require this of others, so lifting the quality and reputation of VET by shining new light on examples of both the exceptional and the inadequate.

As my mother said, ‘when all else fails, tell the truth’.

¹ Author's explanation: 'when all else fails, tell the truth' is a tribute to maternal advice, part humorous and decidedly cryptic, warning: 'best you tell me everything upfront, because any cover ups and half-truths will eventually come out and that's going to be a whole lot worse for you'.

² There are alternate strongly held views that VET should be a public service and that such 'contestable market models' are source of VET's demise.

³ Evidence gets ignored - [humanities graduates have same job prospects as science graduates](#), conflicting with the [Jobs Ready HE reform package](#)

⁴ 20 March 2014 rectified version

⁵ One limitation is that there are some ~3,900 such VET RTOs registered at present, where as there are ~ 180 HE providers.

⁶ On plain interpretation this must mean the amount quarantined as the NTS COPE.

⁷ The Agency Portfolio states NTS-COPE as an [estimated actual 2019/20](#) of only \$32 million, well less than the historic start point of \$47 million

⁸ Junction and overlaps is presently based on the current AQF, or any future amendments [refer AQF Review](#)

⁹ For example it would exclude entity-specific information such as e.g. financial statements, contracts, and strategic/marketing plans

¹⁰ Perhaps allowing RTOs to appeal on a 'if not public, why not' basis and make public reasons for exemption

¹¹ Web based 'data scraping's is routinely done for 'real time' assessment of 'internet/jobs board' job vacancies

¹² Using improved Application Programming Interface protocols

¹³ In the manner of courses clustered into 'cost bands' like VET Student Loans, and like the now 4 bands in the University Jobs Ready package.

¹⁴ In 2019, estimate some 4,429 in total with only 3,671 submitting data to Total VET Students and Courses - NCVET private communication