

SUBMISSION ON THE PRODUCTIVITY COMMISSION ISSUES PAPER: VOCATIONAL EDUCATION AND TRAINING WORKFORCE

My comments on this paper relate solely to Section 2 - "VET in the education sector and the economy" and in particular the subsection "What is the VET Sector". This section of the paper describes VET in the context of the broader education sector and in particular its intersection with the higher education sector. In doing so it makes a number of significant errors and unsupported claims which I wish to draw to the Commission's attention.

Figure 1 – Overview of the education and training system.

This figure attempts to explain the overlap of VET and higher education qualifications through two interconnecting boxes. While doctoral degrees and masters degrees are clearly shown as being solely in the higher education domain, bachelor degrees and associate degrees are shown as being dual sector awards alongside advanced diplomas and diplomas, which is quite erroneous. Only approved higher education institutions can issue bachelor degrees and associate degrees and they belong solely in the higher education sector under the current regulatory framework. These two qualification types should be moved to the box to the left in order to properly isolate them in the higher education sector.

On p.4 the statement "Some Bachelor's [sic] degrees – historically the preserve of the higher education sector – are now also offered by providers in the VET sector" is also misleading in that it implies that VET providers can offer these awards by virtue of being a VET provider. VET providers are not permitted to deliver bachelor degrees unless they have been approved as a higher education institution, thereby becoming what is colloquially known as a dual sector provider. It is the higher education registered arm of a dual sector provider that delivers the bachelor degree not the vocational training arm, the two being quite separate from a regulatory point of view. In fact, some dual sector providers offer master and doctoral degrees, but only in their role as higher education institutions.

While it is acknowledged that there has been "the recent emergence of the concept of a tertiary sector" (p.4) as evidenced by the *Review of Higher Education*¹, I can find no evidence to support the assertion that there is "increasing convergence and overlapping of the VET and higher education sectors". While there is an overlapping of the sectors from a qualification point of view it is at this point that any commonality between the VET and higher education sectors ends. The assertion that there is "increasing convergence" of the sectors is clearly at odds with the two regulatory frameworks that remain quite separate and distinct.

¹ Bradley, D, Noonan, P, Nugent, H & Scales, B. (2008) *Review of higher education - final report*, Commonwealth of Australia.

Figure 2 – Tertiary regulatory intersections.

This figure (in the form of a Venn diagram) contains data about higher education institutions which appear to be both out-of-date and inaccurate. I would suggest that the source used for this data is not a wise choice.

The figure presents the following data sets in relation to the higher education sector:

- Total higher education providers
- Higher education providers that operate in more than one jurisdiction (multi-jurisdictional providers)
- Non-self accrediting HE providers that are also RTOs (dual sector providers)
- Non-self accrediting HE providers that are also CRICOS registered
- Non-self accrediting HE providers that are RTOs and also CRICOS registered

The table below presents each of the data sets along with the number quoted in Figure 2 and the true number as supported by research based on the various government registers. The table also includes an analysis of the limitations of the data sets used.

DATA SET	NUMBER USED	ACTUAL NUMBER	LIMITATIONS OF THE DATA SET
Total higher education providers (counting multi-jurisdictional providers only once)	178	187	Assumes both self-accrediting (46) and non self-accrediting (141) HE institutions
Higher education providers that operate in more than one jurisdiction (multi-jurisdictional providers)	16	24	Does not include self-accrediting institutions which operate in more than one jurisdiction (which many do)
Non-self accrediting HE providers that are also RTOs (dual sector providers)	73	82	Ignores the fact that a number of self-accrediting institutions are also RTOs and therefore will form part of this “regulatory intersection”
Non-self accrediting HE providers that are also CRICOS registered	84	93	Ignores the fact that most self-accrediting institutions are also CRICOS registered
Non-self accrediting HE providers that are RTOs and also CRICOS registered	52	63	Ignores the fact that some self-accrediting institutions will also be part of this “regulatory intersection”

On p.5 the statement in relation to the VET sector that “Such a wide spectrum of providers is not encountered in any other educational sector in Australia” is very subjective. I would argue, based on the evidence, that the higher education sector is as

diverse as the VET sector in relation to the different types of institutions that have been approved to deliver higher education courses, which includes universities, TAFE colleges, professional associations, government instrumentalities, faith-based institutions and for-profit providers, both very small, very large and in between.

I believe that it is important that any paper that presents contextual data and analysis must be carefully researched, otherwise any inaccuracies therein may be quoted for years to come and in some cases become generally accepted as fact. Therefore, I hope that the suggestions included in this submission will help to inform the final paper and allow an accurate picture of the Australian higher education sector to be presented.

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29 July 2010