

Productivity Commission – IBSA Response to Draft Research Report on the VET Workforce

1. Introduction – IBSA proposals and the Commission’s response

In its initial submission to the Productivity Commission last year, IBSA emphasised the following aspects of VET workforce requirements:

- a strengthened set of agreed performance measures
- a substantially improved data base to enhance understanding and policy development
- greater opportunities to undertake higher level qualifications
- ongoing professional development options and opportunities, and
- such opportunities be delivered via the expansion of networks and bodies, to be resourced and supported by employers, the VET workforce itself and other industry players in the VET sector.

These proposals related mainly to the capability and capacity issues of the VET workforce; capacity representing output or productivity, while capability represents the potential ability of the workforce to conduct effective training and assessment.

The Commission has largely addressed our proposals, as well as asking for specific action by IBSA.

This response focuses on the draft report’s Chapter 8 *Improving the workforce’s capability*. The chapter includes seven draft recommendations, five draft findings and a list of information requests (see attached document, pages LIV to LVII).

Draft recommendation 8.3 asks IBSA to amend the Evidence Guide for TAEDEL401A which would strengthen the assessment of competence in delivering training, while draft recommendation 8.6 asks IBSA to consult with the sector and develop options for ongoing professional development that address competency gaps and/or contribute to further capability development.

In relation to IBSA’s other proposals outlined in its initial submission the Commission has:

- asked NCVER to consider the information required to allow the critical determinants of quality teaching to be investigated quantitatively;
- asked the Ministerial Council to engage NCVER to develop a comprehensive instrument with which to identify the VET workforce
- in a draft finding (see attached document 8.3) in relation to the education capabilities of the VET workforce
- has found little evidence of capability gaps in relation to delivering training and assessment to students who may experience disadvantage, although this may become important in the future with an ageing workforce and anticipated increase in VET delivery to disadvantaged students

- has found some evidence of a capability gap relating to delivery of higher level qualifications
- has found evidence of a significant capability gap in ICT skills
- has found evidence of a capability gap in the ability of some VET practitioners and enterprise trainers and assessors to assess RPL and RCC
- has found evidence of capability gaps among VET managers and leaders
- has sought quantitative evidence on the relationship between teacher qualifications and teacher quality by level of qualification.
- asked State and Territory governments to assess the adequacy of their funding provisions for ongoing professional development of their VET workforce and non-government RTOs are asked to identify their capability needs and target funding accordingly

IBSA supports all the above recommendations and findings and states its willingness to consult with the sector to develop options for ongoing professional development. As IBSA also covers the ICT sector we could include this capability concern in our consultation process.

In developing options for ongoing professional development, IBSA will consider the extension of the current and proposed units of competency at Certificate IV and Diploma qualifications into a range of specialist Vocational Graduate Certificate and Vocational Graduate Diploma qualifications in areas such as Advanced Assessment and Instructional Design. Basically the idea would involve the development of a large and diverse bank of units which could meet VET practitioners professional development needs at various levels.

2. Certificate IV in Training and Assessment (TAE40110)

As indicated above, the Commission has asked IBSA to amend the Evidence Guide for TAEDEL401A (the core unit *Plan, Organise and Deliver Group Based Learning*) to require those seeking to demonstrate competence at the Certificate IV level to prepare and deliver at least four consecutive supervised training sessions, with at least two of these sessions validated by an assessor external to the RTO (Draft Recommendation 8.3).

Clearly the Commission considers that supervised delivery should play a stronger role in the determination of competence, and that the assessment of competence in this core skill may not be adequate in all RTOs.

In addition, the Commission noted that this unit was an elective in the TAA41004 qualification, which might mean that there is a capability gap for some of the existing workforce to be addressed through ongoing professional development.

IBSA supports draft recommendation 8.3 which asks IBSA to strengthen the assessment of competence in delivering training in the Certificate IV qualification, and subject to consultations with its major stakeholders, will move to amend the Evidence Guide as proposed, aiming to establish a peer review process, with an interim step the use of independent VET practitioners to achieve external validation.

However, while we support this attempt to strengthen the competence of the VET workforce in their delivery skills, we believe that there may be a more direct and effective approach, which when taken in conjunction with the above proposal, should lead to better quality outcomes.

Nevertheless the Commission has concluded that the Certificate IV, when well taught, is an appropriate qualification for the development of essential foundation competencies for VET practitioners (see draft finding 8.1). IBSA emphasised during the review process for TAA41004, and in its proposals for the recently endorsed TAE40110, that the Certificate IV was and is an entry level qualification, which needs to be built upon by VET practitioners over time, through experience and/or further qualifications.

The Commission has also recommended that within two years of commencing employment, VET practitioners should have completed the Certificate IV from TAE10 (see draft recommendation 8.4). It does so on the grounds that it ought to be a minimum requirement for all practitioners and that currently an estimated 36,000 VET practitioners do not hold a Certificate IV. In addition the Commission proposes that enterprise trainers and assessors should complete a relevant Skill Set within two years.

Following its analysis of the numbers of VET practitioners not either currently holding a Certificate IV qualification or studying for it (82%), the Commission is concerned that the VET sector would not be able to supply an increase in delivery of this level, while maintaining quality, with a risk that existing compliance and quality assurance problems could be increased. The Commission has therefore sought further information on this and related points (see information request 8.13).

However IBSA believes that a very high proportion of practitioners in this category would be able to demonstrate their competence through a RPL or RCC process, which the Commission itself recognises but may have underestimated.

IBSA supports draft recommendation 8.4, which proposes that VET practitioners should have completed the Certificate IV from TAE10 within two years of commencing employment, provided of course that the essential elements of competency based training concerning the capacity to demonstrate competence against units of competence/qualifications, is accepted and utilised.

In relation to quality and compliance the Commission recommends that TAE10 should maintain its status as a high risk qualification requiring more frequent and intensive audits and requesting regulators to publish information on audit outcomes and performance indicators for RTOs (see draft recommendations 8.1 and 8.2).

IBSA does not support recommendations 8.1 and 8.2, which asks regulators to undertake more frequent and more intensive audits and publish information. Instead, in the context of the current regulatory framework, IBSA would propose the imposition of penalties for non-compliance. These proposals should be seen in relation to the proposal below.

3. Strengthening the delivery of TAE40110

Taken together, the proposals contained in the Productivity Commission's draft Research Report on the VET Workforce should improve the delivery of the Certificate IV qualification. The real issue is whether they will be sufficient to make a substantial and break through contribution to improving delivery.

Since the introduction of the Australian Quality Training Framework (AQTF) in 2001, it has been a requirement that trainers and assessors have relevant vocational competencies, *at least to the level being delivered or assessed*. When applied to the industry of training and assessment it means that a person can achieve a Certificate IV in Training and Assessment one day and begin training in it the next day, without having to hold any other vocational competencies/qualifications. This surely adds to the "high risk" character of the qualification, even though the incidence of such circumstances is likely to be low.

There has also been considerable discussion within the VET sector during the last few years concerning the issue of assessment. A recent NCVET publication, *Practitioner expectations with the Certificate IV in Training and Assessment (TAA40104)*, made the following observation:

"In relation to the perceived deficits in the certificate IV, participants agreed that there was insufficient skill development associated with competency-based assessment and that anything involving the development of assessment tools was too difficult and should not be expected of novice practitioners when more experienced practitioners also struggled in this area. It was recognised that many new entrants were provided with assessment materials; however, it was considered important that they have at least the capacity to evaluate those resources and modify them where required to suit the needs of their learners" (page 31, NCVET December 2010).

As a consequence of these sorts of views, IBSA deleted the then core unit, Develop Assessment Tools, from the new TAE40110, maintaining it as an elective unit in the qualification. In addition it is IBSA's intention to include this unit as a core in the newly revised Diploma of Training and Assessment, which is likely to be endorsed by the middle of 2011.

Nevertheless, this difficulty with developing adequate skills in assessment remains a major issue for the sector and is recognised by the Commission in its report, despite its finding that the Certificate IV, when well taught, is an appropriate qualification for the development of essential foundation competencies for VET practitioners (see draft finding 8.1).

Given the issues outlined above and the evidence of non-compliance, who should deliver and assess the Certificate IV in Training and Assessment? IBSA would propose, that in relation to this qualification, the AQTF rule about trainers and assessors having relevant vocational competencies, *at least to the level being delivered or assessed*, be changed **so that it would be a requirement that trainers and assessors either hold the revised Diploma of Training and Assessment, or be able to demonstrate competence against all the units required in the Diploma qualification.**

Important points in relation to this proposal are:

- that this proposal does not relate to the current Diploma (TAA50104), as it represents a hybrid experienced trainer and assessment/management qualification, whereas the proposed new qualification is clearly focussed on increasing the skills of experienced trainers and assessors
- that it is not part of this proposal that the Diploma becomes the entry level qualification required to train and assess in the VET sector; this remains the Certificate IV qualification, except in cases when delivering the Certificate IV
- that it would require a significant period (say three to five years) of notice, prior to its implementation to enable the development of RTO capacity and
- that it would require significant support from key stakeholders and authorising agencies to enable successful implementation.

IBSA believes that this approach, taken in concert with the proposals included in the draft report, represents a direct and significant strategy to improve the workforce capability of the VET workforce, in the crucial areas of training and assessment.

4. Conclusion

IBSA is pleased to support the measures suggested in the report to improve workforce capability and is committed to play its designated role in implementing these measures.

But we would reiterate our belief that even stronger measures are required to achieve a breakthrough in significantly improving the training and assessment skills of the VET workforce. If the Certificate IV in Training and Assessment is to retain its "high risk" status, which we support, then a strong approach to ameliorating and minimising that risk is to ensure that those delivering that qualification are highly trained and experienced VET practitioners.