

# NQC RESPONSE TO THE PRODUCTIVITY COMMISSION DRAFT RESEARCH REPORT ON THE VOCATIONAL EDUCATION AND TRAINING WORKFORCE

## INTRODUCTION

The National Quality Council (NQC) is pleased to provide feedback to the Productivity Commission on the *Draft Research Report – Vocational Education and Training Workforce* (November 2010). Council commends the Productivity Commission on the work undertaken so far in capturing the diversity and complexity of the Australian VET sector, its appraisal of the composition of the VET workforce and of its current and future skill requirements, as well as the preliminary considerations it has developed of the productivity improvements that might be implemented in order to meet COAG objectives. In its response, the NQC also highlights areas which still require further consideration by the Commission.

The NQC comments on those preliminary considerations, findings and draft resolutions of the draft research report which relate to NQC policy and supporting research. Its response is focused on Chapter 8, *Ensuring Workforce Capability*.

The NQC notes that a number of the draft findings and recommendations are concerned with the training of trainers and assessors within the VET sector. The TAA04 Training and Assessment Training Package (now superseded by the TAE10 Training and Education Training Package) identify the competencies and capabilities required for VET practitioners with responsibility for training and assessment. TAE10 also identifies competencies applicable to professionals managing the design and quality of assessment. The Certificate IV in Training and Assessment is central to the integrity of the VET system as a whole as it impacts on the assessment outcomes of all VET qualifications. The NQC is of the view that considerable work remains to be done by the Commission in finalising recommendations as to how the issues associated with the qualification might be addressed and to give consideration to current and recent research of the NQC in so doing.

The NQC has been aware of a range of issues in relation to the Certificate IV for some time. It has noted a number of significant factors which have impacted on VET workforce needs and their skill requirements in regard to assessment. These have included casualisation of the workforce, priorities established by the COAG Productivity Reform Agenda; increased adoption of distance and on-line delivery strategies; growing requirements from industry for RTOs to reflect a closer client focused approach in the design and contextualisation of training and assessment; and the need for a significantly increased focus on equity considerations. In 2009, the NQC commissioned a national strategic industry audit of TAA40104 Certificate IV in Training and Assessment. Stage 1 of this work provided national data concerning the uptake and implementation of the qualification and identified critical areas of non compliance with the requirements of the Package and with the AQTF. It has also informed Stage 2 of the project in identifying likely causes of issues identified in the Stage 1 audit and in the development of evidence based recommendations for action to address the issues in both the short and medium to long term. This is likely to include recommendations for consideration by both the National Standards Council and the National VET Regulator, both of which are to be established in 2011. Stage 2 research is currently near completion and is anticipated to be available for consideration by the NQC in March 2011.

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## GENERAL COMMENTS

Based on its policy development processes and research, the NQC:

- Agrees that a number of issues apply to the training of trainers and assessors within the VET sector while noting that a number of draft recommendations made by the Productivity Commission do not accord with the findings of its own research.
- Agrees that the TAA40104 *Certificate IV in Training and Assessment*, when well taught [and when it is delivered in compliance with the requirements of the Training Package and the AQTF] represents a satisfactory *minimum* qualification for VET practitioners; and that this is likely to apply equally to its successor, TAE40110 *Certificate IV in Training and Assessment*. However, current NQC research suggests that within the VET sector, the Certificate IV is often perceived not as a *minimum* qualification but to represent the totality of skill and knowledge requirements to practice within the VET sector. In practice, trainers and assessors may find themselves with higher level responsibility within an RTO and with responsibility for the RTO's compliance with the AQTF for which the entry level qualification has not prepared them.
- Supports the recognition of VET trainers and assessors as being 'dual professionals' who require both industry and pedagogical competencies.
- Requests that the Commission give further consideration to ways in which the ongoing skills development of VET practitioners following completion of an entry level qualification may be achieved, including a consideration of registration schemes as a means of doing this.
- Suggests that the low level of compliance of VET practitioners holding TAE40110 *Certificate IV in Training and Assessment* has less to do with poor enforcement of the AQTF than with the fact that trainers and assessors have demonstrated equivalency with the competencies identified in TAA04/ TAE10, on the basis of prior studies, ongoing professional development and currency within the job role. This is in accord with the principles of competency based training and with the NQC Determination of 17 June 2010.
- Does not support the view that more frequent and more intensive auditing processes governing the ability of an RTO to deliver TAE40110 *Certificate IV in Training and Assessment* can act as the main vehicle by which better quality outcomes may be achieved. Current NQC research is concerned with identifying ways in which the high risks presented to the VET sector by this key qualification might be better managed through a tactical and strategic response which is likely to include a number of actions.
- Supports the need for the development of a national capability building plan for the VET workforce, the priorities for which should be developed together with states and territories.

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## CHAPTER 8 ENSURING WORKFORCE CAPABILITY

### DRAFT FINDING 8.1

On balance, the Commission concludes that the Certificate IV, when well taught, is an appropriate qualification for the development of essential foundation competencies for VET practitioners.

*The NQC agrees with this view provided that the Commission places emphasis on the capacity of the Certificate IV to provide foundation or entry level skills which need to be built upon over time.*

### DRAFT RECOMMENDATION 8.1

The Certificate IV in Training and Education (TAE40110) should maintain its status as a high risk qualification. Auditing by state and territory regulators of RTOs with this qualification on their scope needs to be more frequent and more intensive.

*The NQC requests that this recommendation be amended. While individual Registering Bodies might have accorded high risk status to TAA40104, this has not in fact been universally applied.*

*It is anticipated that the AQTF National Guideline for Risk Management revised by the NQC in 2010 will provide for enhanced national consistency in the regulation of RTOs delivering this qualification. The NQC does not agree that more frequent or more intensive regulation of RTOs with this qualification on scope would provide the most effective means of raising the quality of its delivery if implemented in isolation from consideration of the range of criteria identified in the AQTF National Guideline for Risk Management but would be one of a number of actions, including an increased focus on adding this high risk qualification to the scope of an RTO's operations.*

### DRAFT FINDING 8.2

Many people actively engaged in the VET sector as trainers and assessors do not have the necessary minimum educational qualification of the Certificate IV in TAE or an equivalent qualification.

*The NQC Determination of 17 June 2010 requires that trainers and assessors hold TAE 40110 **or be able to demonstrate equivalent competencies**. This is in accordance with the principles of competency based training and assessment. A number of trainers and assessors will have been able to demonstrate equivalency and currency of competency through RPL/RCC processes and this is subject to audit under the AQTF.*

### DRAFT RECOMMENDATION 8.2

State and territory regulators should publish information on audit outcomes and performance indicators for RTOs, to further incentivise providers to focus on quality training and assessment.

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*NQC supports the draft recommendation in principle, with the qualification that information published must have a public value and that the publishing entity must be appropriately protected in undertaking this function.*

## DRAFT FINDING 8.3

Considering the educational capabilities of the VET workforce:

- There is little evidence of the VET workforce currently having capability gaps in delivering training and assessment to students who may experience disadvantage. However, this is an area of considerable exposure for the VET sector in the future, with an ageing workforce and an anticipated increase in VET delivery to disadvantaged students

*The NQC requests the Commission to more closely consider the possibility that capability gaps **may** exist in regard to meeting the special needs of variously disadvantaged groups. Units of competency in TAE10 make reference to individual learner needs<sup>1</sup> but the degree to which the skills required by trainers and assessors in identifying and catering for particular needs that might be developed within TAE40110 may not be reliable given indications that market pressure exists for RTOs to deliver the Certificate IV in the shortest period of time within a highly competitive market.*

*The NQC agrees with the IBSA submission which indicates that the move towards greater provision of language, literacy and numeracy (LLN) necessitates that VET trainers and assessors be equipped to provide this training, and that this will require increased commitment of resources and a greater knowledge of teaching theory and practices by trainers and assessors than may be required in the delivery of more vocationally specific courses.*

- There is tentative evidence of capability gaps relating to delivery of higher level qualifications

*NQC research (2009) identified this as a priority for capability building within the VET workforce in order to support achievement of COAG 2020 priorities for workforce development and states and territories have been advised of this priority. The NQC has no way of identifying whether priorities for capability building that it has identified have been acted upon.*

- There is evidence of a significant gap in ICT skills among the VET workforce

*The NQC has the view that E-assessment is increasingly used within the VET sector but that it is not well understood and is inconsistently applied and is currently engaged in research jointly with FLAG which aims to enhance the quality of E-assessment and the application of*

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<sup>1</sup> For example, TAEASS402A Assess competence includes in required skills the need to *identify candidate needs*. TAEDEL301A Provide work skill instruction requires the trainer to gather information about learner characteristics and learning needs (performance criteria 1.1). TAEDEL401A Plan, organise and deliver group-based learning includes a similar performance criterion (1.2)

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*contemporary assessment practices within the VET sector.*

- There is evidence of a capability gap in the ability of some VET practitioners and enterprise trainers and assessors to assess RPL and RCC

*The revised AQTF Standards require all assessment, including RPL, to be systematically validated. The NQC anticipates that the greater focus that Element 1.5(d) places on assessment practices through validation will result in improvement to the quality of assessment in VET.*

*However, recent research conducted by the NQC has identified significant compliance issues with AQTF Standard 1.5 in relation to the implementation of TAA04 and the NQC is of the view that these are likely to apply equally to TAE10. As noted, the NQC has commissioned research to identify likely causes of non-compliances identified in relation to its audit of TAA40104 and to develop evidence based recommendations for action to address the issues both in the short and medium to long term.*

- There is evidence of capability gaps among VET managers and leaders

*The NQC is in full agreement with this observation and urges the Productivity Commission to give detailed consideration to ways in which ongoing skills development of the VET workforce may be supported beyond the development of the entry level skills which TAA40104 was designed to provide. It follows that VET managers and leaders are very likely to have capability gaps if VET managers and leaders are attempting to undertake higher level responsibilities on the basis of holding an entry level qualification.*

- *The NQC advises that other workforce capability gaps relate to working within workplaces and in partnerships. The NQC has provided the Commission with details regarding work it has done in this area and has since developed a guide for use by RTOs and enterprises seeking to establish and maintain partnership arrangements.*

## DRAFT FINDING 8.4

Industry currency is not well-researched or understood. While currency is often equated with industry release, or work in industry, maintenance of currency can occur through a variety of activities. There is evidence of currency gaps in the current workforce, particularly among those who have worked full-time in the VET sector for more than 10 years. Continuing professional development systems need to identify and address these gaps.

*The NQC requests that the Productivity Commission review this recommendation and take account of the NQC's policy response to this issue in 2009. In reflection of its research findings, the NQC:*

- 1) *provided an updated Determination (18 December 2009) of its competency requirements of trainers and assessors by including additional text to clarify what is meant by the vocational competency of trainers and assessors.*

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- 2) *updated its mandatory text requirements in the Training Package Development Handbook. Training Package developers must provide advice within the Assessment Guidelines about industry's clear directions on the vocational competence and experience for assessors, to ensure that they meet the needs of industry and their obligations under the AQTF. The NQC has also given industry the capacity to provide advice outlining what industry sees as acceptable and relevant forms of evidence to demonstrate the maintenance of currency of vocational competency.*

*This allows industry to provide advice related to the vocational competencies of assessors relevant to their industry, including relevant industry qualifications and/ or competencies and relevant industry experience for assessing against the Training Package or for specific qualifications within the package.*

*It is anticipated that implementation of NQC policy will take place over time and that Industry Skills Councils will update packages to include new mandatory text requirements within their contractual arrangements with DEEWR in the development and review of training packages*

## DRAFT RECOMMENDATION 8.3

Innovation and Business Skills Australia (IBSA) should amend the Evidence Guide for TAEDEL401A to require those seeking to demonstrate competence at the Certificate IV level to prepare and deliver at least four consecutive supervised training sessions. An assessor from outside an RTO delivering the unit should evaluate a student's competence through observation of two of these sessions.

The NQC requests that the Commission review the appropriateness of this recommendation in terms of the extent of positive outcomes that might be gained relative to the regulatory challenges it presents.

Recent NQC research indicates that some providers of TAA40104 'cut corners' in their delivery of the qualification in order to compete within a highly competitive market. It also found that RTOs delivering the qualification do not always apply the principles of competency based training and assessment to this pivotal qualification. The inclusion of a practicum at Certificate IV level, as suggested within the draft research report, would assist in addressing this issue.

As noted, current NQC research is concerned with identifying immediate and short term action as well as for action in the longer term. This is likely to include policy advice for both the NSC and the NVR that may arise from the review to enhance competency outcomes of VET trainers and assessors through the Certificate IV.

## DRAFT RECOMMENDATION 8.4

Within two years of commencing employment, VET practitioners should have completed the Certificate IV from TAE10. Industry experts, working under supervision, should be encouraged but not required to obtain a Certificate IV in TAE. Within two years of commencing delivery of training or assessment, enterprise trainers and assessors working under the supervision of someone with the Certificate IV, should have completed the Skill Set relevant to their role.

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*As noted, the NQC Determination of 17 June 2010 provides a two year period (to June 2012) by which time trainers and assessors already in the workforce must either hold TAE40110 or be able to demonstrate equivalent competencies.*

*The NQC believes that it is the role of industry to specify the period of time a VET practitioner may work in the sector under supervision on commencement. The revised requirements for mandatory text within the Training Package Development Handbook enable industry to provide this advice if relevant to specific needs.*

## DRAFT RECOMMENDATION 8.5

In order to improve delivery to Indigenous VET students, VET providers should attempt to secure the services of more Indigenous VET workers. Possible strategies include ensuring the presence of Indigenous staff members on recruitment panels and charging an Indigenous HR manager with attracting, coordinating and retaining Indigenous employees across their organisation. Recognising that it is difficult for VET to attract skilled Indigenous VET workers who are also being sought by industry, the VET sector should also put in place strategies to support Indigenous students to complete their studies within the VET sector.

*The NQC supports this draft recommendation in principle. It suggests that the Commission strengthen the recommendation to include the requirement that a strategy be developed to support indigenous students in completion of their studies within the VET sector and that this be formally monitored and evaluated.*

## DRAFT RECOMMENDATION 8.6

State and Territory governments should assess the adequacy of funding provisions for ongoing professional development of their VET workforce. Nongovernment RTOs should identify capability needs within their workforces and target funding accordingly. Professional development should be a joint responsibility of RTO employers/owners and employees. Innovation and Business Skills Australia should consult with the sector and develop options for ongoing professional development that address competency gaps and/or contribute to further capability development.

*Under the provisions of the National Skills and Workforce Development Agreement (2008), states and territories have responsibility for the development of VET workforce development plans. The NQC notes that the draft report indicates that professional development offered at the RTO level appears to be limited in its nature.*

*While it has no formal role in relation to the Agreement, the NQC informs states and territories of national priorities for capability building of the VET workforce that have been identified through the research undertaken to support its policy development role.*

*Based on its research in 2010, the NQC has recommended to NSOC that priority is given by states and territories to building VET workforce capabilities as follow:*

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- assessors to apply contemporary assessment practices, including a particular focus on moderation and validation and the role that these processes have in managing the quality of assessment;
- auditor, assessor and RTO staff capabilities in regard to the implementation of AQTF Standard 1.5;
- RTO capabilities to support partnerships with industry/ enterprises and in the development of strategies that will build close engagement with enterprises and industry.

*The NQC supports the development of national capability building plan for the VET workforce as proposed by several responses to the Commission's initial discussion paper. This would provide the means to ensure that both national and state/territory priorities for workforce development are addressed. It assumes that such a plan would be developed in collaboration between national and state/territory bodies and that the proposal would include provision to enable its implementation to be monitored and evaluated.*

## DRAFT RECOMMENDATION 8.7

Governments should not endorse or contribute funding to a registration scheme for VET trainers and assessors.

*The NQC is of the view that the Commission has not yet given sufficient consideration of the establishment of registration schemes as a framework for enabling ongoing professional development of VET trainers and assessors – in particular as the draft research report indicates that both employees or employers regard current arrangements as inadequate and that TAFES and private providers reported low to medium expenditure (0 -4% of payroll) on training and development. The draft research report does not provide evidence of 'de facto' VET practitioner registration existing through existing regulations. The NQC has the view that professional development will address capability deficiencies only if it is focused on contemporary practices, if it is adequate and if it is regular. It does not support the assumption in the draft research report that professional development provided by the RTO will be as good as that provided through associations or networks.*

*While the NQC acknowledges that registration schemes have administrative and compliance overheads, it does not agree that such schemes 'can introduce barriers to the recruitment of skilled workers to the VET sector who do not immediately meet all the necessary requirements'. The options outlined in the NQC's research report Carrots, Sticks, a Mix, or other Options were concerned with supporting ongoing development, not with initial entry requirements.*

*The NQC report found that a registration scheme would complement the existing regulatory arrangements in supporting the quality of VET trainers and assessors and that while voluntary schemes work well for some individuals, compulsory registration schemes work well for others. Specifically, regulatory policies serve well the attainment of entry level skills but they are not effective*



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*in encouraging specialist and advanced skills amongst VET practitioners where developmental policies may be more appropriate.*

## **Information requests on which the Commission seeks further input**

1. Whether VET-in-Schools teachers should be required to have the Certificate IV in Training and Education.

*The NQC Determination of training and assessment competencies to be held by trainers and assessors applies to all trainers and assessors in the VET sector who are delivering VET qualifications, which have the characteristic of being competency based. The Determination therefore applies to secondary school teachers who are delivering VET qualification with recognition under the AQF.*

2. The Commission seeks information on the ability of RTOs delivering the Certificate IV in Training and Assessment to significantly increase their scale of delivery while also improving quality and compliance. It would also welcome information on the ability of state and territory regulators to more intensively audit and enforce compliance in the event of an increase in the number of RTOs delivering the Certificate IV. Finally, the Commission seeks views on the appropriateness of increasing from two to five years the transition period during which existing VET practitioners should be required to gain a full Certificate IV.

*The NQC Determination provides for a transition period of 2 years. It believes that few industries would support extending the transition period to five year as this would have a negative effect on the capacity of the VET sector to be responsive to industry.*

3. The Commission would welcome information on the additional knowledge and skills required by VET practitioners delivering within workplaces, and evidence on whether or not the workforce has adequate capability in this area.

*As noted, the NQC has undertaken considerable research in regard to industry, enterprise and RTO partnerships and has developed a guide which may be used by all parties in establishing and maintaining effective partnerships. It has the view that capability building is required in this area.*

## **Additional comments**

### Accreditation of courses (p. 2.6)

*It is requested that a minor amendment be made to this section. It is not correct that only an RTO is able to create new accredited courses in response to specific demands. Course proponents include industry and professional associations, government departments, public and private RTOs, or individuals. However it is correct that once a course is accredited, it may only be delivered by an RTO.*