

Polytechnic West (PWA) is a large publicly funded RTO and the only dual sector provider in Western Australia. PWA delivers a large range of VET qualifications (from Certificate 1 to Advanced Diploma) and a small range of Higher Education (Associate Degree) qualifications. In particular, PWA delivers training to over 10,000 apprentices per year. Approximately 900 lecturers are employed to train and assess these qualifications.

The development of our workforce is a vital component of our quality delivery and assessment approach and we offer the following comments for your consideration.

#### **1. The TAE40110 Certificate IV Training and Assessment Qualification**

We note that the Commission calls for any quantitative evidence on the relationship between teacher qualifications and the teaching quality by level of qualification. We agree that such information must be vital to confirm the commitment to the continued requirement for VET sector lecturers to hold a training and assessment qualification.

#### **We therefore support Draft Recommendations 7.1 and 7.2.**

Over a period of time the incentive for VET lecturers in WA to undertake university studies to obtain a Bachelors qualification or post graduate qualifications in teaching has been removed. Lecturers now are driven through an organisational need for AQTF compliance rather than a self motivated need for knowledge, skills and career progression.

The question must be asked: why is there a need for VET sector staff to continually need to upgrade their training and assessment qualification when school teachers do not and higher education lecturers are not required to hold such a qualification? It is expected that VET deliverers and assessors maintain their currency both of their vocational competence and their training and assessment practice; however the need to constantly acquire an upgraded training and assessment qualification is almost unique in any industry field. We believe it is unnecessary, costly and ineffective in building training and assessment competencies in our staff.

The current, and the superseded, training and assessment qualifications have focussed heavily on understanding how to translate Training Package outcomes into curriculum and documentation to support the process. It achieves little competence in classroom management and provides little up front support for lecturers new to the profession. 290 hours (the nominal hours for the delivery of the Certificate IV in Training and Assessment in WA) is insufficient time to provide a comprehensive understanding of training and assessment strategies for staff that do not already have experience in the sector. Similar to university lecturers, a small skill set on classroom management would be a more useful investment.

**We therefore agree that, if the qualification remains as a minimum requirement for VET lecturers, Draft Recommendation 8.3 be endorsed. We further suggest**

**that the continued need to upgrade the Training and Assessment qualifications be re-considered.**

We have two further concerns regarding the training and assessment qualifications: cost to the organisation and alienation of staff. In the past few years the qualification required for VET lecturers has changed from BSZ40198 Certificate IV Workplace Assessment and Training to the TAA40104 Certificate IV Training and Assessment and from the 17<sup>th</sup> June 2012, to the TAE40110 Certificate IV Training and Assessment.

The change has particularly alienated staff members who query: how they are “good enough” one day but will “require supervision” the next. No similar impost is placed on university staff who do not achieve research outcomes or upgrade qualifications or higher school teachers who take leave for extended periods.

From June 2012, the new requirement is for staff to hold the TAE40110 Certificate IV Training and Assessment or alternatively to hold a superseded qualification (BSZ or TAA) and for the RTO to provide evidence of managing staff through additional processes. These additional processes have been clarified through a Guideline Paper the Wa Training Accreditation Council (the state training regulatory body) in December 2010 and includes, but is not limited to, direct supervision (for staff with no qualifications or who hold the BSZ), and mapping equivalence to the TAE (for staff who hold the TAA). Direct supervision is a particularly unpopular process as lecturers are often unwilling to co-sign another lecturer’s assessments. Whilst under direct supervision it is a requirement that trainers and assessors meet with their supervisor on a regular basis to collaborate on their training and assessment strategies- this is a major cost to the organisation and detracts from time available for student support. Additional time and effort is required to ensure the paperwork is completed and records are available during AQTF audits.

Taking into account AQTF compliance, the cost to the organisation (to provide direct supervision and mapping of equivalence) and with an emphasis on good practice in terms of staff currency, Polytechnic West has determined that the best approach for this organisation is to ensure the upgrading of staff qualifications to the TAE qualification.

We are concerned at the cost of the upgrade and the RPL process and the cost of the implementation of Draft Recommendation 8.3. It is not possible to absorb those costs into the Polytechnic without a reduction in costs and services to clients.

PWA is of the view that we have been regularly and frequently audited by the state VET regulator for training and assessment, and therefore submit that this does not require attention. However, we are of the view that audits of training and assessment outcomes could attract more attention to verify the quality of such outcomes. For instance, state VET regulatory agencies could devote attention to the quality of training and assessment outcomes of VET providers which process students through multiple certificates in a matter of weeks.

## **2. Registration scheme for VET trainers and assessors**

Polytechnic West sees no evidence of any value in such a scheme and is concerned that any additional costs to (in particular) sessional lecturers will reduce the available pool of VET Trainers and Assessors.

**We therefore support Draft Recommendation 8.7**

### **3. Period for existing VET practitioners to attain the qualification**

Current practice at Polytechnic West requires new permanent lecturers to gain the qualification within 2 years. The lecturers are supported through an internship and mentored and almost without exception have achieved the qualification within the time period.

**We therefore support Draft Recommendation 8.4**

### **4. Industrial Agreements**

Current industrial agreements limit the ability of PWA to attract and retain staff in skill shortage areas.

Additionally, as a dual sector provider and with lecturers delivering across both the VET and Higher Education sectors, PWA has difficulty attracting lecturers who are also delivering at universities (at times delivering the exact same unit) at a different rate. The lack of flexibility is a clear disadvantage to PWA which is required to compete in a competitive market against private RTOs without the restraints of such jurisdiction wide industrial agreements.

**PWA therefore supports Draft Recommendation 7.3.**

### **5. VET in Schools teachers**

PWA supports the need for VET in Schools teachers to have the same level of qualifications that any VET practitioner is required to have. In particular, VET in Schools lecturers are often less experienced in the VET quality framework and less able to access “direct supervision”. This provides a higher level of risk for quality VET training and assessment.

PWA supports the need for VET in Schools teachers to be required to have the TAE40110 Certificate IV Training and Assessment.

### **6. Delivery to VET Indigenous students**

PWA supports efforts to improve delivery to Indigenous VET students. Central to PWA’s strategy to address this issue has been the development and implementation of an Indigenous Employment Strategy Framework. We are of the view that Indigenous staffing will need to be increased to set role models for Indigenous students and foster the appropriate “environment” to attract and retain Indigenous VET students. For instance, central to our strategy has been support for a cohort of Indigenous staff and students to undertake formal VET qualifications in training and assessment.

**PWA therefore supports Draft Recommendation 8.5**

### **7. Published Information of RTO Audit Outcomes**

Whilst PWA is not philosophically opposed to Draft Recommendation 8.2, some caution needs to be exercised with this matter. We are unaware of any evidence to demonstrate correlation between publishing information of audit outcomes and incentivising providers to focus on quality training and assessment. The nature of audit information provided to RTOs by the state VET regulatory body in Western Australia is very specific and would need to be considered in the context of the overall audit report. The nature of any identified non-compliance may well be minor in nature and could be

taken out of context against the entirety of the audit report. The nature of an AQTF audit is also very prescriptive in comparison to audit strategies applied to other education and training sectors; this context/comparison equation should therefore be carefully considered prior to any strategy to consider the release of VET provider audit outcome information.

## **8. Information requests (p. LVI)**

*Are VET providers (public or private) compensated for pursuing non-commercial objectives requested by governments? If so, does the level of compensation accurately reflect additional costs? What form does this compensation take? Is it transparently identified in government budget documentation and as income by providers?*

PWA is not compensated for pursuing non-commercial objectives; indeed PWA is disadvantaged by the restrictions, additional compliance and governance imposed upon us as a consequence of being a public VET provider. If government is to move government RTOs into operating in a competitive training market, then the public RTOs need the ability to “compete” in the open market-place (without the restrictions that are not placed upon private providers). This needs to be balanced against a government RTO’s community service obligations; which also attracts a cost – again, this is not a requirement of a private training provider. Government RTOs are also unable to compete competitively due to the constraints caused by adherence to stipulated industrial awards; again, there is little flexibility to compete with private RTOs in this regard. (Please also refer to point 4 above).

The original submission from Polytechnic West to the Commission also provided detailed commentary on the factors affecting the current and future VET workforce, including our ability to operate in a commercial environment, and the consequential structural workforce issues.

### **Summation**

I trust this information will assist to inform the Commission’s deliberations; please do not hesitate to contact me should any additional information or clarification be required.

Wayne Collyer,  
Managing Director,  
Polytechnic West