

28th February 2011

Education Workforce  
Productivity Commission  
LB 2 Collins St East  
Melbourne VIC 8003

Re: **Draft Research Report – Vocational Education and Training Workforce**

Aged and Community Services Australia (ACSA) welcomes the opportunity to provide comments on the Productivity Commission's Draft Research Report into the Vocational Education and Training Workforce.

ACSA is the national peak body for aged and community care providers representing faith based, charitable and community-based organisations providing residential and community care services, housing and supported accommodation to almost 1 million older people, younger people with a disability and their carers.

We have confined our observations to the recommendations in section 8 of the report as these have the most relevance to our industry and hence we feel more qualified to comment.

### **Recommendation 8.1 and 8.2**

Despite the growing shortfall in the aged care workforce, an increasing number of our members are requiring a minimum of a Certificate III for their workers. The majority of RTOs do a very good job and put a lot of effort into developing their training courses and ensuring good student outcomes. Unfortunately, there is evidence that some students are graduating with poor quality qualifications making them virtually unemployable. This is not a reflection of the hard work put into the development of the content of the courses by the Community Services and Health Industry Skills Council and the aged care industry itself, but the dubious and sometimes unethical behaviour of some Registered Training Organisations (RTOs).

The greatest cause of failure across the VET sector to realise quality outcomes and effective delivery and assessment strategies is due to two factors – the measure of base qualification required of VET trainers and the standard of the information and method presentation as directed by the RTO to its trainers. These are vital issues, because the quality of training our aged care workers receive directly impacts on the standard of care and ultimately the quality of life of older people living in residential aged care or those receiving care whilst living at home in the community.

When auditing RTOs, trainer quality, course material and presentation techniques and long term student outcomes should be the focus of any performance measure. It would be valuable to create greater linkages with productivity and employment outcomes for graduates and the return on investment over time. One way of measuring this would be advice from the organisations that employ the graduating students.

The impost on RTOs to collect and provide this additional data could be significant and may need to be funded by the relevant government departments.

There may be some enhancement in quality standards with the improved mandatory reporting against completion rates and learner and employer satisfaction required of RTOs from July 2010. However, unless the key performance indicators of individually funded providers are made publicly available, students and employers will continue to make poor choices in their selection of RTOs.

Despite the increased burden on RTOs, the publication of the standardised information would go a long way to increasing the confidence of students and employers alike and driving quality reform. It would also help in removing many of the less reputable and “fly by night” organisations currently operating. Information regarding their delivery models and strategies should also be included.

There would also need to be some form of auditing of the information provided by RTOs with appropriate and public penalties applied to them if they supply false or misleading information.

### **Recommendation 8.3**

Evidence of trainer competence is a must. In aged care, people with a Certificate III course are expected to be at a minimum standard of competency and poor teaching can impact directly on the care received by older people. Teachers in the education system must undergo assessed teaching rounds, so having to prepare and deliver at least four consecutive supervised training sessions – including using outside assessors – is not a particularly onerous ask and would be beneficial in ensuring consistency across the country.

A project based approach to assessment, where the VET trainer is required to complete a project as part of their assessment using ‘real’ rather than hypothetical subjects and incorporating a reflective practice component could be incorporated into the above.

Three of the state federation members of ACSA are RTOs in their own right. They have found that in some instances trainers with full Certificate IV qualifications have not had sufficient knowledge and skills to create and/or facilitate an effective and engaging learning event.

Some areas of skill deficit they have noted include:

- Poor knowledge of Training Package elements and how to deconstruct these for use in teaching and assessment.
- No underpinning knowledge of educational theory in which to place their practice.
- Poor understanding of educational approaches and mechanisms to create engaging and motivating learning experiences for students.

- Lack of knowledge of the principles of assessment, adult learning and engagement.
- Very poor 'class management' skills to identify students at risk or disengaged learners.
- Few critical reflection skills to evaluate and redesign aspects of their teaching practice.
- General adoption of ineffective training strategies with the learner having to make the adaptation to the poor quality learning environment rather than the trainer taking responsibility for this aspect of delivery. A broad failure to accept that the content is not the most important aspect of what they do in a classroom situation.
- Not passing students unless they reach the required standard.

#### **Recommendation 8.4**

ACSA agrees that ultimately all VET trainers and assessors should have a minimum Certificate IV in Training and Education (TAE). We recognise there are always transitional issues at play when introducing new standards and care must be taken to maintain the quality of any qualification. Therefore, as well as the recognition of prior learning and competencies of existing, experienced trainers, a sensible timeframe for the introduction and transition to a fully qualified VET sector is a must.

There is always a risk when a large amount of government funding is suddenly released into the system. Fast tracked Certificate IV TAE qualifications may become the problem it has in other qualification areas where unscrupulous RTOs have jumped on the funding bandwagon.

It can be very difficult to recruit trainers with the right mix of qualifications and industry experience. Incentives for industry to facilitate the secondment of trainers from organisations on a part time basis may be useful. This would assist in further developing the coaching skills of these staff within their own organisations, as well as increasing their capacity to act as mentors in the workplace and contribute to teaching and training new staff.

#### **Recommendation 8.5**

ACSA agrees with recommendation 8.5, and recognises the difficulty in attracting and retaining indigenous students. Different teaching skills are required for identified student groups and consultation with indigenous support and other groups is a must to get ideas on how to encourage support in this area.

#### **Recommendation 8.6**

If ongoing professional development is a requirement for VET trainers and assessors, (and we don't disagree with this), funding will be a significant issue. An assessment must be made on funding requirements to ensure the ongoing professional development is able to be maintained. ACSA agrees that both RTOs and the trainers themselves have some responsibility to ensure their competency and capability levels are maintained.

#### **Recommendation 8.7**

The concept of registration has some merit, but ACSA would have to agree with the recommendation that governments not endorse or contribute funding to a registration scheme of individual VET trainers and assessors. In the short term it may provide a barrier to

entry into the field. Further more, the requirement for registration or continued personal development doesn't necessarily marry with the concept of relevance and currency when it comes to ensuring that the Trainers have up to date knowledge of the information they are providing.

ACSA would however like to see a move to registering RTOs. This should be done in conjunction with regular auditing and the publishing of the results as discussed in Recommendations 8.1 and 8.2.

In summary, ACSA agrees in principle with all the recommendations in section 8 of the report.

I am happy to discuss this in the further detail should that be of assistance. I can be contacted on (03) 9686 3460.

Yours sincerely,

**Pat Sparrow**  
**A/g Chief Executive Officer**