



Ms Carole Gardner  
Administrative Coordinator  
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Productivity Commission  
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Dear Ms Gardner

Skills Australia commends the Productivity Commission's *Vocational Education and Training Workforce Draft Research Report*. It is a significant contribution to a better understanding of the VET workforce.

As you are aware Skills Australia released a discussion paper *Creating a future direction for Australian VET in October last year*<sup>1</sup>. This paper and the consultation process that followed focused on the themes of improving the overall VET experience, lifting performance, and establishing strong foundations for growth. The paper also addressed VET workforce issues including the expanded role of VET practitioners; qualifications and professional development; the age of the VET workforce; industry currency and connections; and casualisation.

Skills Australia notes the wide range of provision and the diverse student cohort in the VET sector. This is challenging and has significant implications for the VET workforce. VET practitioners are required to be not only expert in their industry area but also to have the ability to deliver and assess learning programs in a range of contexts and across a range of sectors, potentially including school and higher education. This complexity of environment may include work place and institution based settings. Further, we see in the future an expanded role for VET practitioners to address the goals of increasing workforce participation, skills deepening and workplace productivity. Meeting these needs and addressing the learning styles of an increasingly diverse cohort will require much of the VET workforce

Our response to the Commission's draft report is informed by our consultations and the feedback received in written submissions. A preliminary analysis of the consultation feedback has shown that the quality of teaching and learning outcomes is a major issue for stakeholders. The strong relationship between the quality of these outcomes and VET workforce development was also raised.

### **The Commission's Reform proposals**

I would like to begin by stating the Board's support for the following key proposals for reform:

- more consistent delivery of the Certificate IV in Training and Education (TAE) to the required regulatory standard, to improve basic educational capability and more trainers and assessors in the VET sector to hold this qualification. Skills Australia would also like to note our support for the draft recommendation for more stringent evidence requirements for those seeking to demonstrate competence at the Certificate IV TAE level

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<sup>1</sup> Skills Australia *Creating a future direction for Australian vocational education and training* October 2010

- a VET workforce that includes some workers skilled above the Certificate IV in TAE, to meet the anticipated needs of students including more effective delivery of both foundation skills and higher-level qualifications.
- more industry release, combined with other strategies, to maintain the contemporary vocational competence of those workers who are only employed in the VET sector
- more professional development to specifically meet some capability requirements of the workforce

Skills Australia recognises that TAFE Institutes will have to operate in an increasingly competitive market. If they are to survive and flourish in this environment they must have the means to attract, recruit, manage and retain appropriate staff. To attract staff from strongly growing industry areas it may well be necessary to pay wage premiums.

The Board also agrees that better data — particularly covering the private VET sector — are urgently required to inform policy strategies and assist with workforce planning. Skills Australia supports the Productivity Commission's recommendation for NCVET to investigate quality teaching determinants and student and industry satisfaction. We also suggest research into how various teacher attributes impact on VET student outcomes, including higher level teaching qualifications.

The Board notes the Commission's finding's 4.1 and 4.2 in relation to the public provider, which identify the number of non-commercial objectives of public providers and the potential benefit of increased use of explicit on-budget community service obligation payments to all VET providers (to compensate for provision of non-commercial activities.)

### **Specific information requests**

The Commission has made some specific information requests in the draft report. The Board wishes to respond to three of these:

1. *The Commission seeks further input on whether VET-in-Schools teachers should be required to have the Certificate IV in Training and Education.*

We endorse the requirement for the Certificate IV in Training and Education to be the minimum teaching qualification necessary for VET teachers (excluding guest lecturers). It is the Board's understanding that all VETiS programs for AQF qualifications, whether delivered by school teachers or by VET practitioners in TAFE or other RTOs should be operating under the AQTF. Therefore under AQTF standards these teachers should hold the Certificate IV in Training and Education (TAE), or be able to demonstrate equivalent competencies, or be supervised by someone who does. We endorse this standard but consider the extent of persons operating under supervision and without the Certificate IV in Training and Education (TAE) should be reduced in all RTOs.

It is also essential that VET-in-Schools teachers have appropriate industry qualifications, current vocational competency and experience commensurate with other VET practitioners. Consultations and submissions to our discussion paper indicated industry concerns with VET-in-Schools programs, largely due to the perceived lack of industry qualifications and experience of VET-in-Schools teachers.

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 Board is concerned about the feedback it has received about the quality of the delivery of the Cert IV TAE. In our view it is essential that quality and compliance be improved in this area and we suggest the following reforms be considered:

- Providers seeking registration to deliver the Certificate IV TAE be required to meet higher standards of registration including:
  - a. A deeper level of qualifications and experience of staff
  - b. A demonstrated track record in professional development.
  - c. Meeting a requirement for an external moderation prior to registration conducted by an independent expert moderation panel
- An appropriate arms length separation is required between those RTOs registered to deliver the Certificate IV TAE and their staff who are being trained in Certificate IV TAE. This could be achieved through a system of external validation and moderation or engagement of an independent RTO to conduct the training and assessment.
- Teachers who train and assess in TAE be required to demonstrate higher level qualifications and experience than the entry level Certificate IV in TAE.

Skills Australia recommends maintaining the transition period during which existing VET practitioners should be required to gain a full Certificate IV at two years and not extending it.

We note and support the Commission's notion of *supervised training delivery*, in light of concerns about whether demonstrated competence in delivery is being achieved and about the rigour of assessment of this competence by the delivering RTO's own staff. We support the Commission's proposal that extended supervised training delivery should be mandated as part of the Certificate IV in TAE, and be subject to external assessment. We also support greater transparency of audit results.

Additionally, given the nature of the VET cohort and VET's projected expansion to include more disadvantaged learners, we consider the Language, Literacy and Numeracy (LLN) elective in the TAE should be made mandatory. This would help practitioners to identify student need, design training and assessment that is fit for purpose and to seek out specialist assistance when needed.

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.*

The Board considers the VET sector can contribute significantly to workforce development in enterprises, beyond delivering training in the workplace. This broader role for the VET workforce will require a more entrepreneurial approach and a good knowledge of career and job design, and organisation development, working with employers to help make better use of their employees' skills. Although the Productivity Commission's draft acknowledges the commercial, contestable flavour of the VET environment, we would encourage it to further explore this role for the VET workforce.

## Other comment

The Board is also of the view that the following strategies would contribute to improved quality in the VET workforce:

- the establishment of a qualification structure that supports development of different levels of expertise and specialisation for VET practitioners but that avoids a mandated “one size fits all” approach that might discourage industry people from becoming VET practitioners.
- A strong focus on continuing professional development (CPD) to encompass permanent, part time, casual and VET in schools staff. VET pedagogy is a distinctive form of teaching and learning and although well grounded in theory can be described as ‘applied practical’ or ‘learning by doing’ in approach. A renewed focus on quality teaching and learning across the VET sector needs to reflect this distinctive character both in initial training and in the continuing professional development of VET practitioners. VET practitioners require the capability to devise flexible teaching and learning approaches for both institutional and workplace settings as a regular part of their professional practice.
- A range of incentives that could be used by RTOs to encourage practitioners to undertake higher level qualifications
- A range of incentives that can encourage partnerships between VET and higher education institutions for co-delivery of higher level qualifications and for joint research into high quality teaching and learning issues
- A national program to promote excellence in teaching and learning.

Thank you for the opportunity to comment on this important area of research. Skills Australia would be pleased to further discuss any aspects of this response.

Yours sincerely



Philip Bullock  
Chair  
Skills Australia  
4 March 2011