It takes more than a high-level agreement of Commonwealth and State and Territory Governments – such as the NASWD – to ensure the vocational education and training (VET) system delivers a productive and highly skilled workforce; enables all working age Australians to develop the skills and qualifications needed to participate effectively in the labour market and contribute to Australia's economic future; and supports increased rates of workforce participation.

- It takes commitment from employers, industry bodies, unions, training providers both public and private, and most importantly the educators – trainers and assessors.
- It takes a value system that recognises the true cost of education, well-resourced and well respected.
- It takes consistency across all states and sectors.
- And it takes investment from government, from employers, from industry, from students and from training organisations.

In response to several of the key points in the interim report of the Productivity Commission – National Agreement for Skills and Workforce Development Review. I submit my comments on the following points.

Reform of course pricing

- 1. There needs to be an understanding of the value of VET and the cost of delivery. When the QLD government introduced C3G funding, at a Provider forum, they discussed that they did some quick costings on what a trainer would cost and came up with a figure of \$75K per annum. So even based on this amount when you do the maths of funding being offered of \$5 to \$6 per hour per student you can see that the government funding does not recognise the cost of delivering quality education providing the training, administration, student support services, and resource development it doesn't add up.
- 2. The impost of a student administration fee of 20% when a student studies with a private provider is unfair to those students who choose to use a non-TAFE provider. The same applies in the University sector where the administration fee of up to 25% is applied. This fee goes to the Department of Education it is not a fee that is charged by the Training Organisation.

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Better data collection and comprehensive reporting of the allocation of public funds to support regular assessment of government's policies

- All training organisations provide all data through Total Vet Activity (TVA) reporting.
 Providers who receive funding such as User Choice for traineeships and
 apprenticeships are providing timely data on a monthly basis. For instance, in
 Queensland, RTOs are paid only when the trainee or apprentice completes the unit
 of competency. This outcomes based payment system has been in place for 20+
 years.
- 2. Providers understand their data and use their data to track student engagement and progress.
- 3. Historically, in the case of VFH, the government had the data that would have highlighted issues within the system. This was discussed with the Department by a number of concerned providers on numerous occasions. Expanding data collection is not necessary what is required is a better understanding of what the data is telling you.
- 4. As an example of data not being used in a timely manner consideration should be given to the amount of time it takes once an RTO has provided TVA data to the time this information is banked in the USI student portal.

Boosting participation in training

1. VET Training in schools. Whilst only 5% of VET training is delivered in schools, there needs to be more VET delivered as school-based traineeships and apprenticeships in all states. This provides students with opportunities to gain real work opportunities, longevity within a workplace, more practical skills and a providen work history. The responsibility to perform on the job is real because the student is earning a wage whilst learning. There are clear pathways from the traineeship into higher education, and there are past examples where universities have offered graduates of a Cert III Business qualification gained through a traineeship - direct entry into their Business degree - without an OP score or ranking. Let's not encourage schools to "just do more VET" - let's help schools do more quality VET by using the school based traineeship model - using external training providers to support their students and linking with local employers to provide real paid work opportunities.

Other issues that impact on a quality VET sector

- Training Package developers need to provide more consistency to ensure clarity
 across the sector. If something is implied spell it out if something is expected tell
 us what it is. Let's go back to basics and help all trainers understand the
 expectations of the Training Packages and how each component relates to each
 other.
 - Wouldn't it be great if Training Package units all followed the same naming conventions for units of competency! Take the model from the BSB Training Package e.g. <u>BSBWHS201</u> (Why Business – well they did come first with the

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original BSA Training Package and they have had a consistent track record of Qualifications and Unit codes that are easy to understand.

- How much more consistency could we get if Training Package Developers mapped the performance evidence and the knowledge evidence to the performance criteria. We could ensure that assessment requirements were being interpreted consistently regardless of the industry, state or RTO.
- What if the companion guide or the unit of competency indicates the Core Skills levels (ACSF) of each unit – You can find this for the <u>Community Services</u> <u>Training Package</u> – again it would provide a more consistent approach throughout Australia.

Why does the sector provide half the information, hoping for a 100% guess?

- If trainers and assessors had better guidance, then they would be in a better position to challenge the resources.
- Let's recognise that everyone wants to do their job well. What other occupation sets you up with half the story and hopes you will fill in the rest?
- Note: this doesn't stop unique and niche delivery this all comes with the contextualisation that must be done to effectively assess learners.

And lastly

Opportunities to increase apprenticeship numbers

1. Skilled migration programs have very high participation rates in the workforce, and it's well reported that this stimulates economic growth. However, - has there been any consideration to the linking of the approval of 457 temporary skilled worked visa applications and the recruitment of an apprenticeship or trainee. If workplaces were required to have a pairing system – one 457 worker + one apprentice, then this would improve local employment opportunities for young people and school based apprentices, it would encourage employers to grow their future labour force and it would ensure that the skills temporarily being used would not be lost when the skilled worker returns to their home country – as their will have mentored and train and local person with these skills.

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In essence, having worked in the VET sector for 30 years, and worked across states and funding mechanisms, worked with User Choice, Competitive Funding, Workskills Vouchers, PPP, VFH and Entitlement funding – I see nothing innovative within this interim report. If we look back at previous reports – they would have the same vision. What's needed:

- A sustainable investment that encourages students to access training that is fit for their purpose
- A revamp of the MYSKILLS website to provide accurate information including student survey data similar to the QILT website for Higher Education.
- A commitment from government and industry that recognises the value of training and the increase of productivity because of the training
- A reality check that VFH was not just the rorting of providers but it was a poorly managed and implemented government program, and many providers raised the issues on numerous occasions before any actions were taken.
- The constant degrading of VFH qualifications is a prejudice to both students who have
 worked hard to gain their qualifications through VFH and are now working in sustainable
 employment and to the thousands of committed trainers who have worked in the
 sector, supporting students through their programs and ensuring their completion of
 courses.
- A recognition that charging students a 20% administration fee (by a Government Department) on top of their student fees – only when they study with a private provider is discriminating against students choice to train with a private RTO or Higher Education provider.
- A responsiveness from training providers to meet the market demands of students and employers – within a quality framework
- And clear and consistent guidelines, playing fields, and most importantly a respect and recognition of the VET sector and it's contribution to enabling workers into jobs and therefore the ongoing growth of a productive and efficient workforce.

Jenny Field 15th June 2020