



AIMPE

**Australian Institute of
Marine and Power Engineers
HEAD OFFICE**

National Agreement for Skills and Workforce Development Review,
Productivity Commission
GPO Box 1428, Canberra City, ACT 2601

Wednesday 18 December 2019

Background

The Australian Institute of Marine and Power Engineers ('AIMPE') is the registered organisation which provides professional and industrial representation for qualified Marine Engineers throughout Australia. AIMPE came together as a national body in 1881 after several years during which local organisations were formed in the various colonies of Australia and New Zealand. AIMPE members operate, maintain and repair marine vessels of all sorts including commercial cargo ships of all types and sizes as well as vessels dedicated to the offshore oil and gas sector, tugboats, dredges, ferries, defence support craft, research vessels and Border Force vessels.

AIMPE appreciates this opportunity to make a submission to the Productivity Commission about the effectiveness of the VET sector on which our members rely for their specialist training.

AIMPE Submission: National Agreement for Skills and Workforce Development Review

The Australian Institute of Marine and Power Engineers submits as follows:

- 1. That the commercialisation of VET training through private RTO's operating in competition to State-funded TAFE has not delivered the qualitative outcomes promised. Our members report a general reduction in the quality of learning outcomes and that many RTOs slash training-duration in order to be competitive with other RTOs.**

Supporting evidence that this is widespread in the delivery of maritime training is contained in the Australian Skills Quality Authority ('ASQA') 28 June 2017 report provided to (then) Assistant Minister for Vocational Education & Skills the Hon Karen Andrews MP showing that RTOs were repeatedly advertising training durations significantly less than as indicated by the ASQA 'volume-of-learning' principles.

An extract from this ASQA Report is provided at Attachment 1.

- a. The ASQA Report indicates that by far the worst offenders in slashing training-duration were RTOs providing (lower-complexity) maritime training for deck officer (i.e. Coxswain and Master<24m) and engineer officer (Marine Engine Driver Grade 3 and Grade 2) qualifications.
Further, anecdotal information suggests that many of these RTOs provide the deck officer training only by theory, without any practical element, such that individual students are not given the helm nor assessed on boat-handling competency. As the Australian Maritime Safety Authority ('AMSA') delegates the RTOs to perform this assessment as final proof of the student's competency for issue by AMSA of a (low-complexity) maritime Certificate-of-Competency, this failure in both quality-of-training and duration-of-training not only diminishes the VET system but also has adverse safety implications for the maritime industry and the general public using commercial maritime services.

b. Further as to quality of training, the ASQA Report's Findings include:

- "...many providers...are facing increased pressure to either reduce quality or leave the market..."

c. Further as to duration of training, the ASQA Report's Findings also include:

- "...Concern about unduly short training is widespread and longstanding..."; and
- "...Regulation of duration in VET is complex and confusing, and includes different requirements for duration..."; and
- "...other countries provide greater specification of duration...in competency-based training systems there are still circumstances in which mandating duration is considered....necessary..."; and
- "...significant risk that...learners are not gaining the competencies specified in VET qualifications..."; and
- "...sustainability of the VET system is at risk unless ...unduly short training is...addressed..."

2. **This unwillingness of the VET system in Australia to specify minimum duration of training-delivery-time puts at risk the entire Australian VET system. It mitigates against the ability of the VET system to deliver training to meet regulatory standards, particularly where such standards include minimum training time requirements.**

For example, the VET system provides training for deck and engineer officer (higher complexity) qualifications which must comply with Australia's agreement to apply international standards, in this case the International Maritime Organisation's ('IMO') STCWⁱ model courses for Deck and Engineer Officers that for each subject matter mandate a recommended minimum duration of training input. Importantly, other nations who are signatory to the same STCW Convention at intervals travel to Australia to audit the compliance of both AMSA and RTOs delivering (higher complexity) maritime training to ensure that the requirements of the IMO's STCW model courses are met or exceeded. However, the resistance of the Australian VET system to specifying training duration is making compliance with these international requirements difficult to achieve.

See Attachment 2 being an AIMPE letter to relevant authorities dated 19 November 2018.

3. **That the plan to commercialise VET training through private RTO's operating in competition to State-funded TAFE has not delivered the cost-competitive reductions in pricing to students, instead the commercialisation of such training provided the excuse to allow prices to students to be massively increased,** with government funded student-loan systems used (mis-used?) to prop up the higher prices. We offer no independent evidence of this, relying on the newspaper/media coverage of rorting of the training system by new-start RTOs signing up students to courses they do not necessarily complete, in order to access government funding; and

4. That this 2012 to 2016 massive increase in training-cost-to-students is a major contributor to the reduction in training completions over the same period.

The graphs from your Issues Paper showing reduction in higher qualification completions under the VET system since 2012 are closely correlated with the explosion in the cost to students of TAFE Study over that same period.

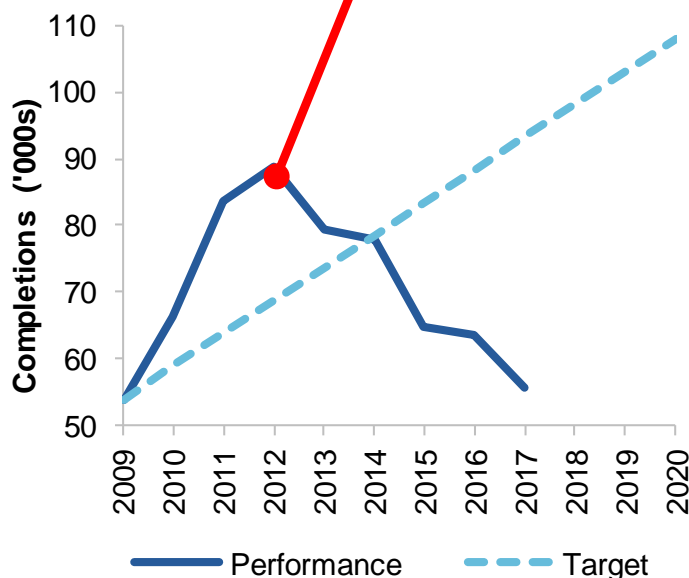
See Attachment 3 being an AIMPE letter 7 June 2016 to TAFE NSW over the fees increases.

For example, the increase in cost of Marine Engineer Cadet training course from \$1,308 to \$12,000 in same period as covered by your graph can be demonstrated below:

Marine Engineer CADET training cost increased more than **900 %** in period 2012 to 2016.

Marine Engineer Class 2 training cost increased more than **870 %** in period 2012 to 2016.

Marine Engineer Class 1 training cost increased more than **790 %** in period 2012 to 2016.



5. That the concept of sharing funding between government/employer/student has in the case of the maritime industry failed. If Australia is to continue producing its own cadre of merchant marine deck and engineer officers, then a greater share of the training cost must be borne by government.

Past practice of passing the cost of training back to the Australian employer/industry is no longer viable, as particularly the vessels requiring higher-complexity Certificates-of-Competency are increasingly not Australian-registered and therefore not subject to Australian laws (including Taxation). This collapse of maritime employment in Australia is a result of Federal Government [both sides of politics] failure to require ships/seafarers

engaging continuously in Australian domestic trade to Register under the Australian Flag thereby coming under Australian law.

6. **As a result of the explosion in cost of VET training for Deck and Engineer Officers and as a result of the collapse of employers ability to contribute to funding for seafarer training there has been a striking reduction in the number of Deck and Engineer Officers trained by the VET system.**

Henning Christiansen
DIRECTOR PROFESSIONAL DEVELOPMENT



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ⁱ STCW is the International Convention on *Standards of Training Certification and Watchkeeping 1978*, as amended, produced by the International Maritime Organisation ('IMO')

REPORT

A review of issues relating to unduly short training



Australian Government

Australian Skills Quality Authority



Australian Government
Australian Skills Quality Authority

Letter of transmittal

The Hon Karen Andrews MP
Assistant Minister for Vocational Education and Skills
Parliament House
CANBERRA ACT 2600

Dear Minister

I am pleased to provide the report on the Australian Skills Quality Authority's (ASQA's) national strategic review of issues relating to unduly short training.

ASQA initiated this strategic review in response to concerns raised, through both its regulatory findings and previous strategic reviews, that unduly short training is preventing learners from gaining the skills and competencies required to be certified as competent from VET courses.

This national strategic review involved examining the websites of RTOs to determine the length of courses being advertised. The review has found that more than a quarter of VET training package qualifications are being advertised with course durations below the period recommended by the Australian Qualifications Framework.

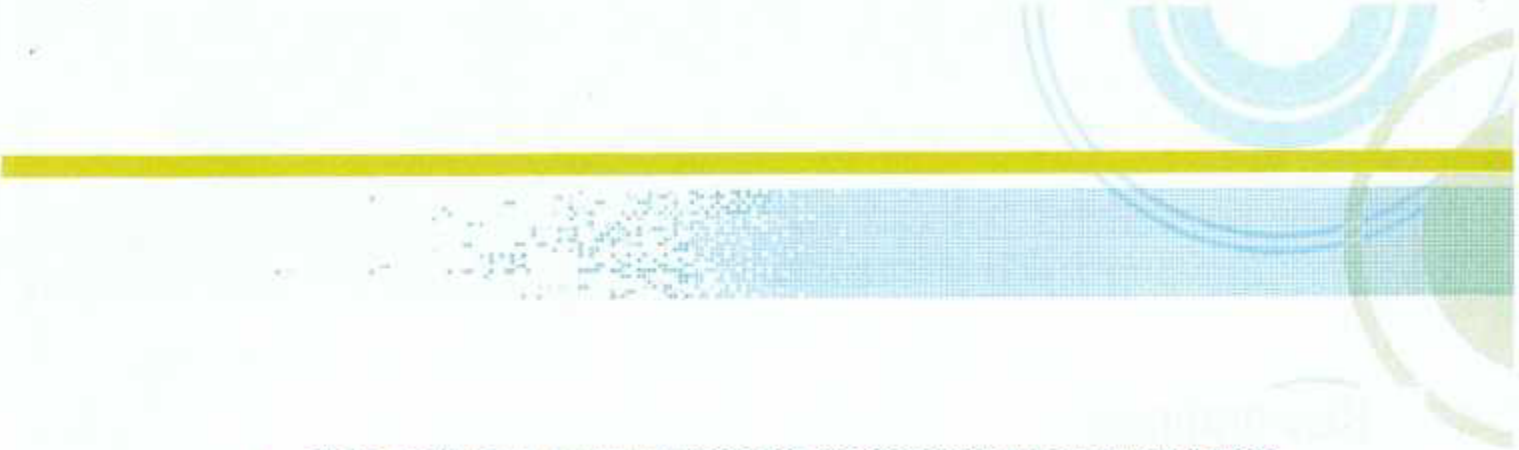
ASQA is concerned that this is an indicator of 'unduly short training'—courses that do not deliver sufficient training to support learners to gain the required competencies. ASQA's regulatory work to date has found the impact of unduly short training to be widespread, posing fundamental challenges to ensuring high-quality training across the country.

The review was guided by a reference committee of key stakeholders drawn from industry, providers, regulators and government and chaired by ASQA's former Chief Commissioner, Chris Robinson. ASQA is grateful for the invaluable contribution of the reference committee—both collectively and individually—and also for the active support and contributions from other stakeholders.

Key recommendations of this review address the findings that:

- Regulation of duration in VET is complex and confusing, including different duration requirements for the two different types of nationally recognised training products.
- There is significant risk that in many cases the duration of training is not sufficient to enable learners to gain the competencies specified in the training, leading to loss of confidence in vocational education and training and long-term costs to industry, individuals, the community and governments.

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Quality Authority
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- There is insufficient consistently presented and comparable information available to enable VET consumers to allow them to make informed choices between RTOs.
 - Sensible and proportionate change to the VET regulatory framework will enable effective regulation of course duration, provide industry with a lead role in addressing the risks of poor-training by specifying their requirements, and empower industry and prospective learners with the information to more readily compare training providers and their offerings.

The implementation of this strategic review's recommendations will considerably strengthen the quality of training and assessment provided to learners. This is particularly important; not only for the integrity of the VET sector but also for other key industries, especially those related to public health and safety, that rely on the integrity of AQF qualifications to guarantee a skilled workforce.

I commend this report and its recommendations to you.

Yours sincerely

Mark Paterson, AO
Chief Commissioner and
Chief Executive Officer

 June 2017

Key findings

- Research, stakeholder reports and a number of ASQA's previous strategic industry reviews show that concern about unduly short training is widespread and longstanding.
- Regulation of duration in VET is complex and confusing, and includes different requirements for duration for the two different types of nationally recognised training products.
- Other countries provide greater specification of duration, demonstrating that in competency-based training systems there are still circumstances in which mandating duration is considered a necessary means of regulating quality.
- There is significant risk that in many cases learners are not gaining the competencies specified in VET qualifications, leading to loss of confidence in vocational education and training as well as long-term costs to industry, individuals, the community and governments.
- More than a quarter of the 11,677 advertisements reviewed on ASQA-regulated RTOs' websites that advertised duration for training package qualifications have a course duration below the minimum of the Australian Quality Framework (AQF) volume of learning range.
- Many providers offer good-quality training; however, these providers are facing increased pressure to either reduce quality or leave the market—because they cannot compete with providers offering unduly short and inadequate training programs.
- The long-term sustainability of the VET system is at risk unless the issue of unduly short training is definitively addressed.
- There is insufficient consistently presented and comparable information available to enable VET consumers to make informed choices between RTOs.
- Sensible and proportionate change to the VET regulatory framework will enable effective regulation of the amount of duration, provide industry with a lead role in addressing the risks of poor-quality training (by specifying their requirements), and empower industry and prospective learners with the information to more readily compare training providers and their offerings.

Appendix D— Training package qualifications

Appendix D sets out the full list of training package qualifications where the review found five or more duration advertisements. There are 422 training package qualifications, listed in order of the highest proportion of advertised duration that is less than half the minimum recommended by the AQF volume of learning.

Code	Qualification Name	Less than half AQF	Less than AQF	Number of Advertisements	No. of RTOs	Enrolments in advertised courses	Enrolments in equivalent qualification	Enrolment %
MAR30913	Certificate III in Maritime Operations (Master up to 24 metres Near Coastal)	100.00%	100.00%	9	8	222	646	34.37%
MAR30813	Certificate III in Maritime Operations (Marine Engine Driver Grade 2 Near Coastal)	100.00%	100.00%	5	5	123	378	32.54%
CPP20212	Certificate II in Security Operations	100.00%	100.00%	31	27	14,204	18,342	77.44%
MAR20413	Certificate II in Maritime Operations (Marine Engine Driver Grade 3 Near Coastal)	90.00%	90.00%	10	9	59	362	16.30%
CPP30411	Certificate III in Security Operations	86.67%	90.00%	30	22	9,696	12,740	76.03%
TLI41210	Certificate IV in Transport and Logistics (Road Transport - Car Driving Instruction)	85.71%	85.71%	7	6	614	997	61.58%
MAR20313	Certificate II in Maritime Operations (Coxswain Grade 1 Near Coastal)	75.00%	81.25%	16	14	766	1,795	42.67%
PSP61012	Advanced Diploma of Translating	71.43%	100.00%	7	6	2,855	2,891	98.75%
CPP30607	Certificate III in Investigative Services	70.00%	80.00%	10	10	495	616	80.52%
TLI32410	Certificate III in Logistics	60.00%	70.00%	10	8	3,597	11,971	30.05%
FNS51210	Diploma of Insurance Broking	60.00%	80.00%	5	2	494	494	100.00%
BSB30407	Certificate III in Business Administration	60.00%	60.00%	5	3	1	220	0.45%
PSP41512	Certificate IV in Government (Investigation)	50.00%	62.50%	8	7	476	988	48.18%
UEE40411	Certificate IV in Electrical - Instrumentation	50.00%	50.00%	10	10	821	1,346	61.00%
CPC31411	Certificate III in Construction Waterproofing	50.00%	50.00%	6	5	1,033	1,425	72.49%
BSB30307	Certificate III in Micro Business Operations	50.00%	75.00%	8	8	382	2,360	16.19%
SIR10112	Certificate I in Retail Services	40.00%	60.00%	5	5	81	700	11.57%
FNS60110	Advanced Diploma of Insurance Broking	40.00%	100.00%	5	2	10	10	100.00%
AVI50408	Diploma of Aviation (Instrument Flight Operations)	37.50%	75.00%	16	13	606	666	90.99%
CPC30313	Certificate III in Concreting	33.33%	33.33%	6	5	1,969	6,883	28.61%
CHC42608	Certificate IV in Colebrancy	33.33%	33.33%	6	5	292	292	100.00%
BSB30712	Certificate III in Work Health and Safety	33.33%	77.78%	9	8	1,343	2,794	48.07%
SIS30313	Certificate III in Fitness	31.58%	65.79%	76	48	20,468	30,163	67.86%
TAE40110	Certificate IV in Training and Assessment	31.32%	46.70%	182	140	32,502	53,748	60.47%
HLT32612	Certificate III in Pathology	30.77%	69.23%	13	11	2,669	4,872	54.78%
TLI31610	Certificate III in Warehousing Operations	30.00%	50.00%	30	26	9,054	15,820	57.23%
BSB40207	Certificate IV in Business	30.00%	30.00%	10	9	17	585	2.91%



AIMPE

**Australian Institute of
Marine and Power Engineers
HEAD OFFICE**

Mr Klausch Schmidt, Australian Industry Standards Ltd

Ron Horne, Australian Industry Standards Ltd

Mr Mick Kinley, CEO, Australian Maritime Safety Authority

By email: Mick.Kinley@amsa.gov.au

For attention of: Mr Tony Menezes
Australian Maritime Safety Authority

Mr Jon Black, Managing Director, TAFE NSW

CC: The Regional General Manager
North Region, TAFE NSW

CC: Mr Aziz Adebayo
Head of Marine Engineering School
Hunter Campus, TAFE NSW

Mr Steve Moon, Chair, Maritime Industry Reference Committee

Monday 19 November 2018

Dear Colleagues,

Re: Proceedings of 3rd Meeting of ETO Technical Advisory Committee 19 November 2018

The concerns I raised at today's meeting of the Technical Advisory Committee charged with the task of formulating the Electro Technical Officer ('ETO') training units to be added to the Maritime Training Package ('MTP') revolve around the three sets of incompatible restrictions arising from IMO-STCW, NSW-TAFE and the VET system respectively:-

1. We are repeatedly told by AISL that the VET system 'rules' do not permit the MTP to specify duration/hours of training input; and
2. The Phase 3 Review of the MTP has the express purpose that the MTP be amended to include all the AMSA/regulatory requirements: this necessarily includes IMO-STCW 'Model Courses' for Marine Engineers and ETOs that for each subject matter mandate a specific MINIMUM duration/hours of training input; and
3. Hunter TAFE college [and probably TAFE WA] are constrained by arbitrary restrictions on course length / teaching-hours that are substantially less than stipulated by IMO-STCW 'Model Courses'. This is exacerbated when available teaching hours in all subjects were further reduced in 2018 due to percentage budget cuts.

It is in the above context that today's TAC proceedings must pause on the threshold question; are we simultaneously able to comply with all three sets of 'rules' or restrictions? And the work done so far in mapping the IMO-STCW 'ETO Model Course' suggests we cannot do so.

This mapping exercise focussed on ETO-specific competencies and as such commenced with the assumption/expectation that existing Engineer WatchKeeper ('EWK'), Engineer Class 2 ('EC2') and Engineer Class 1 ('EC1') components of the MTP adequately reflect the relevant IMO-STCW 'Model Courses'. (Note also that independent work still underway in mapping EWK/EC2/EC1 engineering competencies against IMO-STCW requirements suggest that serious deficiencies in content, particularly because of insufficient duration/hours of training, will form the conclusion that none of the Australian MTP complies with STCW at all.)

So, on the rash assumption that the MTP adequately covers all the engineering/electro-tech subjects available across EWK/EC2/EC1 we decided to establish what other requirements the IMO-STCW 'ETO Model Course' makes that would have to be fulfilled by the 4 ETO-specific courses that this TAC is working on. Those requirements are set out in Attachment 'A' and indicate not just the subject material that the 4 ETO-specific courses must address, but also the depth of study required and MANDATES that some 225 hours of training time be given in respect of those 4 courses.

In the context of the 'rules'/limitations set out in the first page of this letter it is exceedingly doubtful that the proposed 4 units (even if beefed up in terms of text relating to subject matter) can deliver the depth of study mandated by the requirement for the 4 units to constitute an additional 225 hours of study.

I believe this is a high level issue that cannot be resolved within the ETO TAC and suggest that much higher level discussion is required in order to find a way to move forward.

Prima facie, if no action is taken to resolve this, then the MTP in general, and the ETO units in particular, will NOT comply with IMO-STCW standards.

On reflection one wonders why we persist with the MTP and do not in its place adopt the IMO-STCW model courses in full.

Henning Christiansen
DIRECTOR PROFESSIONAL DEVELOPMENT



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**Parts of IMO-STCW 'ETO Model Course' NOT in EWK/EC2/EC1 training
thus must be covered in 4 ETO-specific draft training units.**

FUNCTION 1: COMPETENCE

1.4.1.1 "High Voltage Technology"	15 HRS
1.4.1.2 "Safety Precautions & Technology"	5 HRS
1.5.1.1 "Main Features of Data Processing"	45 HRS
1.5.2.1 "Construction & use of Computer Networks on Ships"	30 HRS
1.5.3.1 "Bridge Based, Engine Room Based & Commercial Computer Use"	45 HRS
1.7.1.1 "Automatic Telephone Systems"	8 HRS
1.7.1.2 "Emergency Sound Powered Telephones"	1 HRS
1.7.1.3 "Talkback – Intercom systems"	1 HRS
1.7.1.4 "Public Address System"	4 HRS

FUNCTION 2: MAINTENANCE & REPAIR

2.1.5.1 "using smart transducer as calibrator by programming via hand-held communicator" (this is a part of a larger subject area requiring 20 HRS)

2.1.6.1 "Graphic Symbols"	6 HRS
2.3.1.1 "Radars"	9 HRS
2.3.1.2 "Global Navigation Satellite Systems"	4 HRS
2.3.1.3 "Inertial Navigation System"	2 HRS
2.3.1.4 "Ship Compass Equipment"	6 HRS
2.3.1.5 "Speed Logs"	5 HRS
2.3.1.6 "Echo Sounder Systems"	2 HRS
2.3.1.7 "Marine Autopilots"	6 HRS
2.3.1.8 "Voyage Data Recorders, Navigation Lights, Search Lights, Ship Horns & Sound Systems, Wind Trackers"	5 HRS
2.3.2.1 "Ship Communication Systems"	15 HRS
2.5.1.1 "Elevators"	8 HRS
2.5.1.5 "Hotel Lighting Systems"	5 HRS



AIMPE

Australian Institute of
Marine and Power Engineers
HEAD OFFICE

7 June 2016.

Ms Christine Warrington
Acting CEO & Director, Hunter TAFE

CC: Mr Robert Wolter
Director, Industry & Resources, Hunter TAFE

Dear Ms Warrington

Re: inequitable FEEs at Hunter TAFE

The Australian Institute of Marine and Power Engineers ("the Institute") is deeply concerned at:-

1. The recent escalation of FEEs charged to marine engineering students; and
2. Inequities in the Administration and application of such fees; and
3. Reports from our members alleging threatening behaviour by Administration personnel against marine engineering students.

We invite you to peruse the substantiation of each of the above contentions at **Attachment 1** and seek your written reply within 7 days.

Given the urgency of this matter as the threats made by your Administration staff impact on the ability of students, members of the Institute, to complete their studies which are due to finish next week you will understand that if the Institute does not have a satisfactory resolution of this matter within 7 days then we must consider ourselves at large to take this matter up with the State Manager and, if necessary, the Minister.

In the meantime should you wish to meet face to face to discuss these matters I can be available in Newcastle Friday 10 June.

Sincerely

Henning Christiansen
DIRECTOR PROFESSIONAL DEVELOPMENT
0419 400 324



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CC: Mr Jim Mallows, Director Professional Standards AIMPE
CC: AIMPE Federal President & Federal Executive

1. The recent escalation of FEEs charged to marine engineering students.

The small TAFE fees (less than \$1000 p.a.) previously charged could be passed on to the employer.

However:-

- in the last 4 years there has been a massive increase in the fees charged to students; and
- there is now little/no capacity for employer-funding.

The hike in college fees has come at a time when employers of Tax-paying Australian seafarers are under such commercial pressure from Tax-free foreign ships/seafarers that many companies are unable to pay and jobs are being lost every day.

As this funding from companies has dried up the Institute has found it necessary, commencing 3 years ago, to replace many of the Employed Cadets with Sponsored (i.e. NOT employed) Cadets.

Thus in a dramatic change from the previous history of predominantly company-funded Trainees and Cadets this explosion in course fees is making maritime training unaffordable because the majority of marine engineering students are now without external funding....they are self-funded.

These unemployed Cadets do not have the resources to fund \$12,000 p.a. in college fees.

Escalation in College Fees:

- 1.1 Cadet or Trainee doing Watchkeeper Course: 20 week college course Newcastle TAFE: in 2012 the fee was \$1,308
In 2016 the fee is \$12,000
- 1.2 Cadet or Trainee doing Watchkeeper Course: college course at Fremantle TAFE:
In 2016 the fee is \$ 8,225
- 1.3 Cadet or Trainee doing Watchkeeper Course: college course at Launceston - AMC:
In 2016 the fee is \$ 11,185
- 1.4 Engineer doing Engineer Class 2 Course: 32 week college course at Newcastle TAFE: in 2012 the fee was \$1,570
In 2016 the website suggests the fee is \$10,285 however published costs are higher at \$13,700
- 1.5 Engineer doing Engineer Class 2 Course: college course at Fremantle TAFE:
In 2016 the fee is \$5,977
- 1.6 Engineer doing Engineer Class 2 Course: college course at Launceston - AMC:
In 2016 the fee is \$11,869
- 1.7 Engineer doing Engineer Class 1 Course: 32 week college course Newcastle TAFE: in 2012 the fee was \$1,570
In 2016 the website suggests the fee is \$10,285 however published costs are higher at \$12,400
- 1.8 Engineer doing Engineer Class 1 Course: 1-year college course Fremantle TAFE:
In 2016 the fee is \$6,502.90
- 1.9 Engineer doing Engineer Class 1 Course: college course at Launceston - AMC:
In 2016 the fee is \$11,869

2. **Inequities in the Administration and application of such fees.**

The current class of marine engineering students for the 'Engineer Watchkeeper' course is a diverse group:-

- One student funded by the Navy;
- One student funded by ASP Ship Management
- The remainder are un-funded
- Of these unfunded students one is doing many of the same courses in pursuit of the 'Engineer Class 3' rather than the 'Engineer Watchkeeper' qualifications.

- 2.1 Some students have been charged FEEs on the basis that **the \$12,000 charge includes payment for all subjects relevant to the Certificate of Safety Training.**

For example Mr _____ has had the \$12,000 FEE reduced by \$4,000 Fee for the *Certificate of Safety Training* on the basis he has RPL for that subject.

- 2.2 other students in the class have been charged FEEs on the basis that **the \$12,000 charge does NOT include payment for all subjects relevant to the Certificate of Safety Training.**

For example Mr _____ has had the \$12,000 FEE increased by a \$4,375 Fee for the *Certificate of Safety Training*.

- 2.3 Some students have been given **RPL of substantive subjects but offered no reduction** in the course FEEs.

For example _____ was granted RPL in respect of the two subjects 'Electro-Technology' and 'Marine Electrical Practice' yet has been charged the full \$12,000 + \$4,375 for the course. This is the same FEE as charged to Mr _____ and Mr _____ who both had no RPL whatsoever.

- 2.4 Some students have been **charged an additional \$1,000 FEE merely to access Hunter TAFE's student records** and confirm that the student attended this campus previously and was previously credited with a pass in a relevant subject.

For example Mr _____ has had his FEE increased by an additional \$1,013.56 FEE on the basis he has RPL (described as 'Direct Credit Transfer') for the *Certificate of Safety Training*.

- 2.5 Some students have been charged FEEs on the basis of a **\$700 charge for all subjects relevant to Advanced Fire Fighting.**

For example all students funded by the Navy.

- 2.6 Some students have been charged FEEs on the basis of a **\$1,700 charge for all subjects relevant to Advanced Fire Fighting.**

For example Mr _____, Mr _____, Mr _____ and indeed all students not funded by anyone but, despite being unemployed, having to find the money themselves.

- 2.7 Some students have been charged FEEs on the basis of a **\$1,700 charge for all subjects relevant to both Advanced Fire Fighting and Lifeboat/Survival.**

- For example Mr .
- 2.8 These students have been enrolled on the basis that their entire cost for the course is \$12,000 with no other on-costs or extras.
The Hunter TAFE website at <http://www.hunter.tafensw.edu.au/browse-courses/pages> for the *Diploma of Maritime Operations (Engineer Watchkeeper) MAR 50115* advertises a FEE of \$12,000 with no reference whatsoever to the additional \$4,375 that Hunter TAFE charges above the FEE-‘cap’.
I am given to understand that this FEE of \$12,000 is the maximum TAFE can charge under the capping system. However TAFE reaps maximum FEEs at 9+ times the fee charged in 2012 then charges additional FEES outside that government-mandated cap under the mistaken concept that the *Certificate of Safety Training* is an industry-requirement and therefore industry/employers can afford to pay on a ‘user-pays’ basis. I refer you to my remarks at item 1 above.
- 2.9 This artificial distinction between subjects arbitrarily within the ‘cap’ and the other subjects deemed outside the ‘cap’ (and therefore able to be charges additional uncapped FEEs) is perceived by students as a deceit by TAFE. As a result the self-funded students are not prepared for the extra costs levied against them by TAFE and these self-funded students are often in no position to pay such additional FEEs. I refer you to the letter sent to you by one of the other students in the class, Mr , dated 24 May 2016.
- 2.10 This last is made even more odious when TAFE arbitrarily determines that student-loans under the ‘VET Fee-Help’ scheme are only available for the advertised \$12,000 FEE, but NOT available for all the additional FEEs charged above the ‘cap’. The website referred to above gives the student to understand that VET FEE HELP “...provides students with the option of deferring all of their tuition fees...” (my emphasis) yet as students approach the end of their course they find no assistance available under this scheme for the additional charges above the FEE-‘cap’. It means that additional FEEs which are not advertised in the course material and come as an enormous additional burden on un-funded/self-funded students cannot even be given assistance under this scheme. This is a further unnecessary burden on these unemployed students and such callous actions would appear to do TAFE no credit at all.
- 2.11 Finally, with all self-funded students in the class in severe financial difficulty over the additional \$4,375 charged above the FEE-‘cap’ for the *Certificate of Safety Training*. Hunter TAFE organised to conduct an extra *Certificate of Safety Training* course free-of-charge. The course ran with only 7 students rather than the 12 places available. Hunter TAFE Administration made no effort to offer any of the free places to the unfunded students who were having such difficulties with the FEE levied for that same course.

3. Threatening behaviour by Administration personnel against marine engineering students.

3.1 All students in this class have now been threatened by Hunter TAFE Administration staff in some or all of the following ways:-

3.1.1 That if the student does not pay the additional \$4,375 by next week (i.e. week commencing Tuesday 14 June 2016) they shall not be permitted to complete the academic subjects; and/or

3.1.2 That if the student does not pay the additional \$4,375 by next week (i.e. week commencing Tuesday 14 June 2016) they shall not be issued a grade/credit in the academic subjects; and/or

3.1.3 That if the student does not pay the additional \$4,375 by next week (i.e. week commencing Tuesday 14 June 2016) they shall not be permitted to attend the *Advanced Fire Fighting Training* course and therefore will not have the requisites to achieve their Watchkeeper Certificate of Competency.