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THE UNIVERSITY OF MELBOURNE

MELBOURNE GRADUATE SCHOOL OF EDUCATION

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Dear Commissioners Kalisch and Woods

The Melbourne Graduate School of Education at the University of Melbourne welcomes this opportunity to respond to the Productivity Commission's draft research report on the vocational education and training (VET) workforce. We would be pleased to assist the Productivity Commission in any way we can in this important work. Please do not hesitate to contact me if you wish to discuss our submission.

Yours sincerelv

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Introduction

The Melbourne Graduate School of Education (MGSE) is pleased to have this opportunity to make a submission to the Productivity Commission's *Draft Research Report: Vocational Education and Training Workforce*. Support for the vocational education and training (VET) workforce is an investment in Australia's future and we consequently wish to support the Commission in this important work.

The Productivity Commission's *Draft Report* provides valuable insights into the size and scope of the VET sector and the VET workforce, but the report's analysis and draft recommendations do not yet provide an adequate basis for policy that will support VET teaching. In particular, the report underestimates the complexity of teaching in VET and the knowledge and skills that teachers need to support student learning. This submission focuses on the following issues that need further development in the *Draft Report*:

- How to understand emerging capability gaps in VET teaching;
- The nature of teaching in VET and the qualifications that teachers need as they progress through their careers; and,
- How to support the development of the VET teaching profession and the role that a professional body and a national VET workforce plan can play.

This submission addresses these issues in turn, after first providing an explanation of the contribution the MGSE can make to the Productivity Commission's draft report on the VET workforce.

About the Melbourne Graduate School of Education

MGSE is one of Australia's leading schools of education for research and for teacher education. Its Master of Teaching is an innovative program that is winning the university national and international recognition. The program is based on research about how students learn and effective teaching. It is a clinical practice-based model that allows students to link theory and practice by placing them in classrooms at the commencement of their studies, and throughout their studies, sequencing theory with practice. Master of Teaching graduates enter the workplace as clinical 'interventionist practitioners' who adopt best practice in their classrooms from day one.

Among its large offering of postgraduate programs, MGSE also offers the Master of Education Policy (International), with many of the students being either VET leaders or teachers. The program includes a strong comparative policy component with overseas VET systems, particularly OECD systems.

The LH Martin Institute at the MGSE has recently concluded a national research project on the quality of teaching in VET and teacher preparation and development programs that was funded by the Department of Education, Employment and Workplace Relations and managed by the Australian College of Educators. In preparing this submission the MGSE is drawing on its extensive research into teaching and learning in all sectors of education, which includes research by some of Australia's leading VET researchers.

Emerging capability gaps in VET

The *Draft Report* acknowledges the way in which VET will grow and increase in complexity in coming years in response to the needs of the economy and to support social inclusion, but the way it conceptualises the capabilities that will be needed in the VET workforce do not reflect the growing demands on VET. VET has always been the most diverse sector of education, and demands on it will increase as it supports higher level skills development and increasing numbers of students from disadvantaged backgrounds who will need high levels of support to gain the foundation skills they need for further studies and for work. This means (as is acknowledged in the *Draft Report*) that VET will need to teach higher level qualifications and more students from disadvantaged backgrounds.

The key problem with the *Draft Report* concerning capability gaps is that it equates capability with levels of student satisfaction and not with the complexity of teaching and learning that will be required and the institutional frameworks that are needed to support learning outcomes. The *Draft Report* says that there "is tentative evidence of capability gaps relating to delivery of higher-level qualifications" (Productivity Commission 2010: 8.20), while it says there "is little evidence of the VET workforce currently having capability gaps in delivering training and assessment to students who may experience disadvantage" (ibid 2010: 8.26). In justifying the latter, the *Draft Report* explains that students from disadvantaged backgrounds are no less satisfied with VET teaching than other students, and in some cases express higher levels of satisfaction with teaching. It then draws the conclusion that "In fact, the data suggest that the VET workforce currently copes well with the needs of the vast majority of students who might experience disadvantage" (ibid 2010: 8.15).

Student satisfaction is an important proxy for evaluating the quality of teaching, but it cannot be relied upon as the sole indictor of the quality of teaching (even in combination with employer satisfaction surveys) and even less can it be relied upon as the sole indicator of the capabilities needed for teaching in VET (Moodie 2010; Moodie and Curtin 2010). This point is acknowledged for different reasons in the *Draft Report* when it says:

> "However, data that would support rigorous assessment of the link between teacher characteristics, and student satisfaction and outcomes at different qualifications levels have not been located." (Productivity Commission 2010: 8.20)

This has not stopped the *Draft Report* from drawing conclusions based on assumed connections between these dimensions. The *Draft Report* starts from a premise that capabilities can be reduced to student satisfaction, tries and fails to find the links between student satisfaction and capabilities and draws the conclusion that there is little evidence for capability gaps in the VET workforce in teaching students from disadvantaged backgrounds. In contrast, capabilities should be conceptualised as the capabilities needed to achieve good student outcomes and the complexity of teaching and learning that is necessary to support these outcomes. The notion of capabilities also needs to include the institutional frameworks, resources and curriculum models that teachers have access to. This is because while there can be no high quality teaching without high quality teachers (McKinsey & Company 2007), high quality teaching is shaped by many factors.

Moreover, even if it were possible to reduce capabilities to student satisfaction, this would not reveal the *particular* capabilities that are needed to produce these outcomes. The notion of capability is a catch-all category that does not differentiate between different types of capabilities, or the mix that is required to achieve good outcomes. Capability cannot be considered independently of skilled teaching that contributes to good learning.

Student retention

An analysis of the *Draft Report's* discussion of student retention draws attention to its under-developed notion of capabilities. It explains that students from disadvantaged backgrounds have higher rates of attrition than all VET students, and that they are also more likely to cite illness or other personal reasons for discontinuing studies (Productivity Commission 2010: 8.14). The implication is that these factors are outside VET's purview. In discussing attrition in VET and higher education, McInnes *et al* (2000: 33) argue that:

> "The notion of distinguishing between so-called 'personal' and institutional reasons for noncompletion is conceptually meaningful but in practice is quite misleading."

This is because students rarely give one reason only for their withdrawal, and it is likely that the *interaction* between different components contributes to the total picture. Griffin (1998: 6) explains that "reasons offered by the students may mask much deeper more complex issues related to the student's self-perception." Students from disadvantaged backgrounds have more problematic identities as students than those from more privileged backgrounds, and they often have more complex lives (Crossan, Field, Gallacher and Merrill 2003; McGregor 2009; Reay 2001; Stuart 2005). Students and their institutions are likely to mistakenly accept on face value that students discontinue due to factors in students' lives, rather than the way in which curriculum excludes such students and less than inclusive institutional arrangements. It is true that students from disadvantaged backgrounds have many pressures on their lives and this makes it very difficult to study, but these factors should not be considered separately from curricular, pedagogic and institutional factors.

Looking to the future

Currently, the outcomes for students from disadvantaged backgrounds are very poor, yet they express high levels of satisfaction with teaching. In research undertaken by the Martin Institute, students said that a good teacher respected students and was caring and passionate about their teaching (Moodie and Curtin 2010). Students express high levels of satisfaction in part because of the dedication of their teachers. This is particularly so for teachers in foundation skills such as language, literacy and numeracy in lower level certificates. However, as discussed in the next section, the demands made on *all* teachers will increase in response to the changing student profile and the changing nature of qualifications and requirements for work, and we will need many more teachers with high level skills in foundation skills and in teaching more broadly. This shows that the concept of capability is much broader than student satisfaction and must be focused on producing excellent teachers as well as the broader contextual factors that are needed to support high quality outcomes.

The *Draft Report* needs to conceptualise capability as it will be required in the future, and not just on the gaps it has identified in the present. The *Draft Report* identifies gaps in capabilities in VET in:

- Using technology in teaching;
- Working in more commercially oriented environments;
- Implementing recognition of prior learning and current competence;
- Employment based delivery; and,
- Management expertise.

MGSE concurs that these are important dimensions of VET that will become more important in the future. However, as argued above, this list does not take sufficient account of the demands that will be made on teachers – not just to teach higher level qualifications and students from disadvantaged backgrounds – but teaching in general, whether this is in the workplace, community, on campus or in mixed-mode. By focusing on the present without an analysis of future demands, the *Draft Report* does not extend our understanding of the scope of the changes likely to affect VET as it expands, takes on new roles, develops and extends its models of delivery, teaches at higher levels, is at the forefront of learning for innovation at work, and increases the diversity of already diverse student population. In particular, the *Draft Report* assumes that teaching in VET will remain focused on training packages as they are currently constructed, and not on the emerging broader range and requirements of qualifications. Consequently, MGSE believes that the Productivity Commission's final report should more carefully define what it means by capability and the factors that contribute to it and focus on the capabilities teachers will need in the future. This requires an examination of the nature of teaching in VET and the demands on VET teachers.

The nature of teaching in VET and teaching qualifications

The complexity of teaching in VET is increasing and will continue to do so. The specific government objectives for participation and educational attainment in tertiary education (Commonwealth of Australia 2009) mean that the size of VET will increase, more students from disadvantaged backgrounds will be engaged in VET, and VET will have to teach higher level qualifications. The *Draft Report* acknowledges the diverse nature of the VET sector, but the resulting recommendations on teacher qualifications are based on a uniform notion of VET qualifications and teaching. The *Draft Report* proposes that the Certificate IV Training and Education (TAE) remain the base qualification in VET, but it provides no further guidelines for higher level qualifications. It says more professional development is needed, but this a vague motherhood statement that takes VET no further than where it is at present. The first part of this section discusses the changing nature of qualifications in VET, the second discusses diversity of students, and final part discusses the type of qualifications teachers will need and presents a qualifications framework for VET teachers.

The changing nature of qualifications

The qualifications that VET teachers teach are becoming more diverse, as are the learning outcomes required from 'traditional' VET qualifications. VET now teaches school and higher education qualifications. The boundary between VET and schools is very permeable, with 41% of students undertaking the senior school certificate participating in VET in schools (NCVER 2010c). The Victorian and New South Wales Governments have designated a role for TAFE in delivering higher education programs in their state and this will become an important part of TAFE's provision in the future.

At present, most VET qualifications are based on competencies and are derived from training packages. There is pressure on VET to reshape training packages to include a broader range of learning outcomes. This includes:

- Changes to the Australian Qualifications Framework that require *all* qualifications (with the exception of the doctoral qualification) to ensure graduates have the

knowledge and skills they need to proceed to further study in their field. This means that VET qualifications will need to place a bigger emphasis on skills for further study and also theoretical knowledge;
- Facilitating pathways between VET and higher education qualifications;
- An increasing emphasis on language, literacy and numeracy skills and foundation skills as a core part of qualifications; and,
- Requirements that VET qualifications incorporate 'green skills' and skills for lifelong learning and for further learning at work.

The outcomes of VET qualifications go beyond "the skills, knowledge and other attributes needed to be competent in the workplace" (Productivity Commission 2010: 2.4) particularly if this is defined as competence to undertake current specific workplace tasks and roles. The National Quality Council's (2009: 14) revised definition of competence has been broadened to include "the ability to transfer and apply skills and knowledge to new situations and environments." While there are many who argue that changes to the definition of competence and training packages do not go far enough (for example, see Wheelahan 2010), nonetheless the increased emphasis on underpinning knowledge in training packages and on foundation skills has implications for teachers and teaching. The educational purposes of VET are becoming increasingly important as well as its vocational purposes; indeed, achieving the vocational purposes will depend on the extent to which VET achieves its educational purposes. VET qualifications will continue to change to explicitly include broader educational purposes in responses to the factors identified above. Teachers will need the full repertoire of knowledge and skills required for *teaching* required by teachers in the other sectors of education if they are to meet these goals, while the process through which they develop as expert teachers may differ. This is addressed later in this response.

Different student cohorts in VET

The *Draft Report* takes insufficient account of the different student cohorts and their differing requirements within VET, or the extent to which the needs of particular student cohorts are similar to students in other sectors of education. For example, there were 220,000 VET in school (VETiS) students in 2008 (NCVER 2010c: 6), while there were 457,000 students aged under 19 years in VET in 2008 (NCVER 2010b: Table 3). The number of students in VETiS rose by almost 26% from 2007 – 2008 (Productivity Commission 2010: Table B.12). Moreover, there are increasing numbers of young people in this age group undertaking their senior school certificates in VET institutions; the Victorian dual-sector universities offer the Victorian Certificate of Applied Learning and some offer the Victorian Certificate of Education. Many TAFEs offer these certificates in their own right and all are involved in VETiS programs in partnerships with schools.

VET is by far the biggest provider of tertiary education to young people. There were 447,000 students aged 15 to 19 years enrolled in publicly funded VET in 2009 (National Centre for Vocational Education Research [NCVER] 2010b: Table 3). This was 2.1 times the number of domestic students aged 19 or under enrolled in higher education in 2009 (Department of Education Employment and Workplace Relations [DEEWR] 2010: Table 2.2). Furthermore, the number of students in the 15 – 19 year age group in publicly funded VET has grown by 28% in 10 years, more than double the 9.3% growth in the 20 – 24 year old age group which had the second highest growth (Productivity Commission 2010: Table B.15). The number in most other age groups declined over that time. The 19 and under year age group is 27% of all publicly funded VET students and this is the biggest share of any age group. Yet the outcomes for this age group in VET are poorer than for VET graduates as a

whole. Table 1 shows the percentage of publicly funded VET graduates in TAFE who were in employment only and in employment and/or further study from 2001 – 2010. The employment outcomes for all graduates declined in the in the last few years because of the global financial crisis, but the outcomes for young people show a worrying trajectory downwards over the last 10 years at the same time it has grown as a percentage of publicly funded VET students.

Table 1: employment and further study outcomes for all publicly funded VET graduates and graduates aged under 19 years 2001 - 2010

	Aged under 19 years		all graduates	
	% Employed after training	% Employed or in further study after training	% Employed after training	% Employed or in further study after training
2001	73	90	74.4	87.5
2002	71	89	73.8	87.4
2003	68.7	92.1	73.9	92.3
2004	68.3	83.6	74.6	85.7
2005	70.8	86.8	76.5	87.8
2006	71.5	85.1	77.4	86.7
2007	69.9	84.3	78.8	88.3
2008	70.2	84.9	78.2	88.5
2009	n/a	n/a	74.7	86.4
2010	67.8	83.5	74.5	*86.6
2001-2010	-5.2	-6.5	0.1	-0.9
2003-2010	-0.9	-8.6	0.6	-5.7

*Includes 65 years & over
Sources: DEST (2006); DEEWR (2008; 2009); NCVER (2010a)

There are also parallels to be drawn between students aged under 25 years in VET and higher education. Table 2 shows the numbers of domestic students aged under 25 years in each sector. While the age group aged under 19 years in VET is more than twice as big as in higher education, the numbers aged between 20 – 24 years are very similar. Young people are a bigger percentage of the higher education sector, however there are many more of them in VET. Overall, students aged under 25 years make up almost 44% of the VET, yet they account for almost 51% of hours of delivery (Productivity Commission 2010: Table B.15).

Table 2: no. aged under 25 years in VET & higher education & percentage of sector in 2009

	VET	**HE***
Aged under 19 years	460,300	216,109
Aged 20-24 years	287,400	278,783
Total aged under 25	747,700	494,892
% of sector	43.8	60.8

Source: NCVER (2010a: derived from Table 3); DEEWR (2010: derived Table 2.2 All Students)
*Domestic students only

The needs of young people in VET aged under 19 years are similar to those in schools undertaking VETiS and the senior school certificates more generally. The needs of young

people aged between 20 – 24 years are also similar. All groups require an education that will prepare them for work, for further learning, and for their broader development as the basis of their participation in society. The nature of provision may differ according to the different outcomes sought in each case, but expert teaching is needed in all cases to ensure good student outcomes. Arguably, students in VETiS in schools and students in VET aged under 19 years need the *most* skilled and qualified teachers because the outcomes for these groups are poorer than for other students, and the risks are greater (Polesel 2008). The *Draft Report* poorly serves the needs of this group of VET students despite their vulnerability and their importance to the future productivity and social cohesion of Australia.

The above example discusses the specific needs of one group of students – young people aged under 25 years. Similar arguments can be made for other groups of disadvantaged students, such as adults with low language, literacy and numeracy skills, refugees, prisoners, the long-term unemployed and adults with low level skills already in work in contingent employment. They need highly qualified teachers with specialised skills. Students undertaking higher education in VET institutions need access to teaching staff with similar skills to those in universities and other higher education providers. The needs of different groups of students within VET differ, and in some cases they are similar to students in other sectors.

Teachers' qualifications

The *Draft Report* argues that despite the controversy concerning the Certificate IV TAE that most participants in the consultation felt that it "meets the essential knowledge and skills needs of new practitioners" if it is delivered appropriately (Productivity Commission 2010: 8.4). This does not reflect the level of controversy over the Certificate IV TAE; there are many who agree that the key problem is the quality of delivery, but there are also many who argue that the Certificate IV is inadequate for new teachers *and* that the quality of delivery within the sector is problematic (see Wheelahan and Curtin 2010). Recent research by Clayton et al. (2010: 34) argues that the Certificate IV:[1]

> "...when taught well, can provide some if not all of the essential skills required of new practitioners, particularly if they undertake the program with some understanding of VET or familiarity with training. Further, with appropriate recognition and integration of the experiences that individuals bring with them into the learning and assessment process, there is considerable potential for the qualification to achieve the goals set for it within the sector."

They go on to say however:

> There are, however, key messages from this research for registered training organisations delivering the Certificate IV in Training and Assessment. As identified by the participants in this study, greater emphasis needs to be given in the program to developing the basic knowledge and skills required to motivate, manage, teach and assess learners with diverse needs, with some degree of confidence, if not expertise. Those undertaking the program need to gain an understanding of how people learn and to develop methods of training which are appropriate to the

[1] Clayton et al. were researching the Certificate IV Training and Assessment which was the mandated teaching qualification in VET until the Certificate IV TAE was introduced in 2010. However, there are no substantive differences in content between the two qualifications even though it is been restructured (IBSA 2010).

> context and relevant to their needs. They also need to be given the opportunity to observe new training practices and to try them out and receive useful feedback on areas for improvement. Critical to this approach is the provision of time, space and program flexibility to practise and reflect on new training practices in an environment that supports such activities.
>
> While the certificate IV is deemed entry-level training, it is evident that it cannot possibly meet the initial preparation requirements of all beginning trainers and assessors wishing to engage in vocational education and training. As participants noted in this study, there is a need to develop differentiated qualifications which have the capacity to directly address the diverse experiences and job roles of VET practitioners in the sector and to back these up with continuing professional development tailored to meet the specific needs of individual practitioners.

This is endorsement of the certificate IV as a basic entry level qualification with many caveats; caveats that go to the heart of the knowledge and skills that new teachers need. The *Draft Report* argues that the core units in the Certificate IV provide the foundation competencies needed to cater for individual learner groups, "and deeper competency development can be pursued through electives" (Productivity Commission 2010: 8.14). This argument does not bear scrutiny. The mandated core of the Certificate IV consists of seven units of competency and three elective units of competency. Three mandated competencies are dedicated to competency-based assessment, one is on using training packages, one on facilitating learning in the workplace, another is on facilitating group-based learning, and the last is on designing and developing learning programs (Commonwealth of Australia 2010). An analysis shows that the units of competency, their elements, performance criteria, required knowledge and skills, range statements and assessment guides minimally address inclusive practice and the learning needs of disadvantaged students (and some not at all); a focus on language, literacy and numeracy in the mandated core can barely be discerned, and the emphasis on theories of learning is negligible. This is not a basis for new teachers to begin VET teaching, particularly for those who will be teaching students without foundational skills, and it is irrelevant for those teaching the senior school certificates and higher education qualifications.

A qualifications framework for VET teachers

VET teachers need an appropriate entry level qualification that is nested in higher level VET teaching qualifications. It is important that VET is able to attract industry experts to teaching, and the entry barriers must not be too high. The *Quality of teaching in VET: Options paper* (Wheelahan and Moodie 2010) canvassed as one option a VET teaching workforce that differentiated teachers and the qualifications they need by the level of responsibility they have for teaching and assessing. Such a framework would enable appropriate qualifications to be developed for industry experts who teach intermittently, while allowing appropriate qualifications to be developed for those with higher level responsibilities. A nested framework of qualifications would support new VET teachers from industry who enter VET teaching as a career to gain the skills they need, while preparing them to undertake higher level VET teaching qualifications as they progress in their career.

MGSE supports the development of a new certificate IV that emphasises teaching and assessment, pedagogy, how people learn, and student diversity and inclusiveness for those entering VET. MGSE also supports the development of a range of higher level qualifications designed to meet specific requirements. A uniform approach will not meet the diverse needs of VET students nor VET teachers. Teachers should be required to acquire higher

level qualifications as a condition of progression. The knowledge and skills involved in teaching are derived from a professional body of knowledge and teachers are required to exercise high levels of judgement in their teaching, regardless of their context. A certificate IV is a low level qualification that may provide teachers with entry level skills, but it cannot be the only mandated qualification for VET teachers.

Those who already have teaching qualifications should not be required to undertake the Certificate IV, particularly if it emphasises teaching and learning and pedagogy. They should be required to undertake induction or professional development that introduces them to VET and CBT if they are to teach VET qualifications. Teachers who teach VETiS, the senior school certificates, and higher education qualifications will need qualifications similar to the required qualifications in the school and higher education sectors respectively. Particular attention is needed on developing qualifications specialising in foundation skills and language, literacy and numeracy.

Darling-Hammond found that teacher preparation and certification are strongly related to student achievement. She says that:

> "…states interested in improving student achievement may be well-advised to attend, at least in part, to the preparation and qualifications of the teachers they hire and retain in the profession. It stands to reason that student learning should be enhanced by the efforts of teachers who are more knowledgeable in their field and are skillful at teaching it to others. Substantial evidence from prior reform efforts indicates that changes in course taking, curriculum content, testing, or textbooks make little difference if teachers do not know how to use these tools well and how to diagnose their students' learning needs…" (Darling-Hammond 2000: 32 - 33)

Developing a qualifications framework for VET teachers will help to address concerns about poor quality in VET that have undermined confidence in VET qualifications. VET providers should be required to demonstrate that they have employed teachers with the appropriate qualifications to support the qualifications on their scope of registration. Requiring VET providers merely to demonstrate that their staff undertake continuing professional development is not an onerous requirement and could be easily evaded by problematic providers. It would be more difficult to fudge evidence about the qualifications that their teachers have. This would help to build public confidence in VET qualifications, and improve the quality of provision and outcomes.

Supporting the development of the VET teaching profession

The *Draft Report* argues against registration for VET teachers. It focuses on 'traditional' registration models that are mandatory. MGSE accepts that mandatory registration for VET teachers may not be appropriate, particularly if it places barriers to entry to VET teaching for industry experts. However, the *Draft Report* also opposes funding or government support for the development of a voluntary professional development body for VET teachers. It argues that:

> "The Commission believes that any such scheme would confer benefits almost solely on its members, and should therefore be member funded." (Productivity Commission 2010: 8.41)

In arguing for this position, the *Draft Report* compares and contrasts the self-regulation by accountants through their various professional bodies, and the potential that exists for self-regulation by VET teachers (Productivity Commission 2010: F.17-18). It argues that the key reason the accounting profession is able to self-regulate so effectively is because of the highly competitive market for accountants. Members of professional bodies are able to accrue competitive advantage by membership in such bodies by providing the public with information to differentiate them from unscrupulous providers. The *Draft Report* argues that the VET workforce is unlikely to face the same market environment thus removing the key incentive for such a scheme.

This is a very limited understanding of the role of professional bodies and their potential to self-regulate their industry. The Australian Association of Social Workers (AASW) has 6000 members.[2] It is a highly effective body that strongly influences its profession. It accredits university social work degrees – all 27 universities that offer social work qualifications are accredited by the AASW. The AASW requires an accredited qualification as a condition of membership. Many employers make membership of the AASW a mandatory prerequisite for employment. Unlike accountants, social workers are more likely to be employed in the public sector or in the non-government sector.

This provides a more realistic model for VET teachers, although it would be years before such a body could attain the influence of the AASW. It would result in benefits *beyond* its membership because it would help encourage the profession to take responsibility for its own development and to raise standards. The *Draft Report* focuses on the regulatory mechanisms that can be used to support quality. Arguably, these regulatory mechanisms have not been particularly successful in assuring public confidence in the quality of VET, particularly in the international student market. Unless VET teachers are encouraged to develop as a profession and to take responsibility for the outcomes in VET, the only alternative is increasing regulation. There is considerable research that shows that there needs to be more emphasis on the professionalism of teachers and less on regulation (see particularly Schofield and McDonald 2004). The *Draft Report* does not offer any suggestion on how the professional identities of VET teachers can be supported and how the profession can be encouraged to take a greater role in its development. There is considerable support for a VET professional body and this idea is being seriously considered by various peak bodies. For example, Skills Australia (2010: 60) says that: "The role of a professional body to support the development of professional VET practice might also be a consideration for the future." While such a body would require government support in its establishment years, this would be an investment in the development of the VET profession.

The *Draft Report* also says that it has reservations about a national VET workforce development plan, while at the same time arguing that more professional development is needed (Productivity Commission 2010: 8.36). Its reservations seem to be based on the different needs of VET teachers and students, and the different factors that will shape that. This is a very narrow view of a professional development plan. It seems to be based on the notion that specific developmental activities will be implemented nation-wide in the same way with the same outcomes. A national VET workforce development plan would, in contrast, specify the goals for the development of the VET workforce, the outcomes that are needed, and the types of qualifications that may be required. It would be very broad, while at the same time providing enough support to ensure that VET's systemic objectives are being met. It would consider the obligations and responsibilities of individual teachers, their employing institutions (public and private), government and other bodies with a role in this area (such as Skills Australia and the Skills Councils). MGSE supports a national workforce development plan along these lines.

[2] See: http://www.aasw.asn.au/ viewed 15 January 2011.

Conclusion

MGSE has focused principally on the nature of capabilities, teacher qualifications and development and support for the VET teaching profession in this response to the *Draft Report*. MGSE would be pleased to provide comments on other aspects of the *Draft Report* if the Productivity Commission were to find this helpful.

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