Comments on Productivity Commission Draft Report:

Vocational Education and Training Workforce





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Comments on Draft Report: "Vocational Education and Training Workforce"

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Introduction

Service Skills Australia appreciates the effort undertaken by the Productivity Commission in their Draft Report, *Vocational Education and Training Workforce*.

In this submission, Service Skills Australia reinforces some of the key points and recommendations put forward by the Productivity Commission in the Draft Report.

Where opportunities have occurred for Service Skills Australia to impart additional knowledge based on further developments in our recent work since the last consultation, appropriate comments and recommendations have been made.

It is the firm and committed belief of Service Skills Australia and its industry stakeholders that the key points underpinning the national vocational education and training system are the need for:

- An industry-led vocational education and training (VET) system.
- Industry training packages that operate as the national currency for skills.
- Greater national consistency and responsiveness at a system level.
- Continuing improvements in the quality of VET delivery and assessment.
- Systemic support for the service industries in line with their economic and social contribution.

Given that industry is the central stakeholder of VET, it is of paramount importance to Service Skills Australia that any further reforms to the national education system yield solutions that deliver to industry. Accordingly, any changes in the delivery and assessment of VET should be designed specifically to meet the outcomes required by industry.

Service Skills Australia acknowledges the set of challenges articulated by the Productivity Commission in planning for the VET workforce and is pleased to have been a part of the consultation process.

Contact details

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Acronyms

ABS Australian Bureau of Statistics

AQF Australian Qualifications Framework

AQTF Australian Quality Training Framework

ATMA Australian Training Marketing Association

AVETMISS Australian Vocational Education and Training Management Information

Statistical System

AVETRA Australian Vocational Education and Training Research Association

COAG Council Of Australian Governments

IBSA Industry and Business Skills Australia

ISC Industry Skills Council

JMA John Mitchell and Associates

JNCP Joint National Communications Project

LLN Language, Literacy and Numeracy

MCTEE Ministerial Council for Tertiary Education and Employment

NCVER National Centre for Vocational Education Research

P&C Federation of Parents and Citizens' Associations of New South Wales

RCC Recognition of Current Competency

RPL Recognition of Prior Learning

RTO Registered Training Organisation

SOS Student Outcomes Survey

SRA State (and territory) Registration Authority

SSA Service Skills Australia

TAFE Technical And Further Education

TDA TAFE Directors Australia

VET Vocational Education and Training

Comments on draft recommendations

Draft recommendation 7.1

The Ministerial Council for Tertiary Education and Employment should engage the National Centre for Vocational Education Research to develop a comprehensive instrument with which to identify the VET workforce as soon as practicable. This instrument should focus on measuring and describing the workforce, but not unduly increase the response burden for providers.

Service Skills Australia welcomes the recommendation to develop a comprehensive instrument for measuring and articulating the characteristics of the full VET workforce—those working for government-owned TAFE institutes as well as practitioners working for private registered training organisations (RTOs), including enterprise RTOs.

Having reviewed the suggestions listed in the Draft Report (7.9-7.11), it is not enough to stipulate data provision as a precondition of government-funding. In order for the VET sector to finally obtain and begin using data that is representative of the entire VET landscape—and not limited to publicly-funded VET— data provision should be mandated as a condition of registration as an RTO.

As for the means through which the data may be collected, Service Skills Australia supports the establishment of a simple data submission process that allows the statistics required for government planning to be gathered in the form of an administrative byproduct. It is anticipated that this will assist in reducing the reporting burden required of employers.

Service Skills Australia also supports the motion for guaranteeing the anonymity of providers in published reports and analyses, as it is the collation of statistics—and the quality of those statistics—that are of primary concern.

In regards to NCVER's role in developing this instrument, Service Skills Australia strongly advocates that external input and validation be sought. It is our view that this needs to occur through a transparent consultation process incorporating input from a range of industry stakeholders and other invested parties.

Additionally, Service Skills Australia believes it is essential that the data currently sought be collected through a central agency (and not through state and territory training authorities). However, as VET is no longer the sole focus of NCVER, we seek confirmation that the capacity for NCVER to develop such a comprehensive instrument—with external input and validation—does not conflict or interfere with their recently expanded role into higher education research.¹

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¹ Ross, John (2011) "NCVER's integrated role", in *Campus Review*, Feb 7, 2011: http://www.campusreview.com.au/pages/section/article.php?s=VET&idArticle=19803

Recommendation

Service Skills Australia encourages the better provision of data on the VET workforce. Provisions should be made for RTOs to comply via a simple administrative process that provides accurate data in a consistent manner. Finally, the design of this instrument should involve external input and validation through an appropriate consultation process with the various relevant stakeholders and invested parties.

Draft recommendation 7.2

The National Centre for Vocational Education Research should consider the information required to allow the critical determinants of quality teaching to be investigated quantitatively, and considering the best means of capturing student and industry satisfaction with the VET workforce.

Regarding the best means of capturing student and industry satisfaction with the VET workforce, Service Skills Australia refers to the brief discussion on completion rates as an indicator of satisfaction (APPENDIX D.1).

SSA disagrees with the conclusion put forward that "the subject completion rate measure captures the concept it is intended to capture" (D.3). Completion rates as an exclusive measure of effectiveness or satisfaction continues to be a critical concern to the service industries. There is a strong need for the development of nationally-consistent data collection tools that more accurately measure and evaluate course completion and non-completion rates.

While Curtis' review of this instrument is forthcoming, SSA is able to produce some early findings from its research report *Evaluation Frameworks for VET* in which current assumptions about the reasons for non-completions have been investigated. Undertaken by John Mitchell and Associates (JMA), this project considers:

- non-completion data currently being collected
- non-completion data not currently being collected (but should be), and
- a preferred structure, frequency and collection methodology for data on noncompletions.

Overall, a broad range of fifteen (15) reasons why students do not complete programs has been collected. This list includes factors such as relationship with employer, personal barriers, quality of provider, and interest in the job role. Further key findings from this research project indicate that the two primary categories of issues in relation to the current data collection tool for completion rates (AVETMISS) are:

- 1. the potential for significant inaccuracies in the statistics reported (e.g. no universal student identifier), and
- 2. the need for some alternative future approaches that do not automatically interpret qualification non-completion as a negative outcome (e.g. some students may never intend to complete a program, rather only certain aspects).

Importantly, this project *does not* argue that completion rates should not be measured, nor does it argue that low completion rates are acceptable—completion rates are clearly fundamental tool for assisting in improving quality delivery of training.

Instead, *Evaluation Frameworks for VET* argues for a better understanding of the issue and a better way of measuring the effectiveness of the system. Qualifications are an important outcome for education systems. Our investigation into this issue is driven by an appreciation that 'life is not linear' and that contemporary measurement systems should accommodate this reality.

Furthermore, to quote Andrew C. Smith et al., "a major shortcoming in the [national VET statistics] collection is the absence of large amounts of data from non-TAFE providers". ² It is our hope that this significant shortcoming be corrected post-haste so that the VET system receives the more representative dataset that it justly deserves.

The complete findings of this research project are due to be published in March 2011.

Recommendation

Service Skills Australia seeks a new way of measuring effectiveness of national investment in training. We see it as important that effective measures of VET produce a set of data that reflects the reality of industry and individual participation in education and training.

Draft recommendation 8.6

State and territory governments should assess the adequacy of funding provisions for ongoing professional development of their VET workforce. Non-government RTOs should identify capability needs within their workforces and target funding accordingly. Professional development should be a joint responsibility of RTO employers/owners and employees. Industry and Business Skills Australia should consult with the sector and develop options for ongoing professional development that address competency gaps and/or contribute to further capability development.

Service Skills Australia agrees that professional development should be a joint responsibility of individual employees as well as RTO employers and owners.

Service Skills Australia recently commissioned Prof Erica Smith (University of Ballarat) to conduct a stocktake of the pedagogical training available for trainers and assessors within the service industries. This research into the VET workforce found that workforce development occurs predominantly on two levels.

1. The individual teacher can be committed to personal and professional development and display a strong 'disposition' towards learning and maintaining currency.

² Smith, Andrew C. et al. (2010) Expanding national vocational education and training statistics collections: Private provider engagement, NCVER, p.8.

2. The RTO can also be committed to developing the capacity of the organisation through the provision of targeted professional development that is integrated into the structure and planning of the organisation in tangible and observable ways.

As reported through the case studies that informed this research study, workforce development for the VET practitioner is best undertaken when there are conditions that allow the RTO perform a number of actions.³ The desirable attributes for VET practitioners are also detailed and the report describes these as including a mixture of affective talents such as empathy and patience, blended with deep industry experience and a predisposition to learn and to teach in responsive and pedagogically-informed and inclusive ways.

The suggestions for improvement of the VET practitioner workforce in these industries include:

- A more effective blend of industry experience and training expertise when recruiting staff.
- A more formal approach to professional development plans which allow staff to document their achievements and set career goals for the future.
- Close liaison between traineeship trainers and company training personnel.
- A flexible smorgasbord of staff development activities, able to be customised to meet local needs.
- The use of technology to support professional networks and conversations.
- Support for teachers to access demonstrations by international industry experts (e.g. master florists, master chefs, etc.).
- Close attention to developments in the industry and to individual companies' requirements.
- A stipulated industry currency requirement that offered 'back-to-industry' programs structured to reduce anxiety on the part of the teacher and have an assessable component.⁴

The document also outlines a vision for staff development as a component of workforce planning and describes the desired nature of VET practitioners for the industry. It details a number of examples and recommendations based on case studies undertaken as part of the research project.

³ SSA (2009) *The New Deal: Workforce Development for Service Industry VET Practitioners*, prepared by Erica Smith (University of Ballarat), Dec 2009, p.74.

⁴ Ibid.

Executive summary (SSA recommendations)

Our recommendations in this submission can be summarised as:

Enhanced data measurements

Our submission has highlighted issues around the way that the VET workforce itself is measured, and the way that the effectiveness of the system is measured (i.e. completion rates). Service Skills Australia advocates for a transparent examination of measurement systems as they apply to VET with greater industry input into the design of a system that supports VET activity into the future.

Greater industry involvement

Service Skills Australia believes that the VET system requires greater industry involvement through Industry Skills Councils—in both the design and implementation of training (in a workforce development context)—in order to achieve improved quality outcomes.

Commitment to RPL

Our submission has highlighted issues pertaining to the current structure of RPL processes, barriers to increased uptake, the application of RPL by the VET workforce, and the capacity of RPL to address the workforce development needs of the VET workforce itself.

Service Skills Australia calls for support to have RPL re-stipulated as a mandatory requirement. This will assist in facilitating greater awareness of its pivotal role in VET, greater engagement from learners with the VET system, and greater utilisation of skills within the Australian economy.

Quantifying of volunteer engagements

Service Skills Australia encourages the expansion of NCVER's Student Outcomes Survey (SOS) to formally include the category "to get skills for community/voluntary work" in its listing of the main reasons cited for undergoing training.

Greater understanding of 'skill'

Service Skills Australia proposes that a more thorough discussion regarding the dynamics of defining 'skill' needs to occur before applying issues of 'skills utilisation', 'skills mismatch' and the like to the VET workforce.

Ensuring workforce capacity and efficiency

Draft finding 8.4

Industry currency is not well-researched or understood. While currency is often equated with industry release, or work in industry, maintenance of currency can occur through a variety of activities. There is evidence of currency gaps in the current workforce, particularly among those who have worked full time in the VET sector for more than 10 years. Continuing professional development systems need to identify and address these gaps. (Draft finding 8.4)

Vocational competency (or industry currency)

In keeping with the comments cited by the Productivity Commission (8.36), Service Skills Australia continues to argue that national action on workforce development is appropriate for the VET workforce.

Through various research activities, Service Skills Australia identified the need for trainers and assessors to undertake further learning to ensure currency of industry knowledge and pedagogical skills. In doing so, Service Skills Australia was advised by industry and regulators to expand its focus and become more involved in the implementation of nationally-recognised training as a means of ensuring the quality and effectiveness of training and assessment. Consequently, Service Skills Australia is currently undertaking steps to address the issues of industry currency and pedagogical skills through a more active industry role with our "Right Way" program (please see Appendix One).

The "Right Way" program forms part of our strategic work towards achieving quality skills outcomes throughout the service industries. It also aims to:

- Ensure and recognise the provision of quality training and assessment by RTOs.
- Build the capability of trainers and assessors who work in the service industries.
- Promote the development of, and recognise, effective learning resources that align to training package content.⁵

Effective outcomes of training and assessment are inextricably linked to the quality of these core components of the VET system. Through "Right Way", SSA provides industry recognition of facilities, trainers, assessors and learning resources. Participants in this industry recognition system must adhere to standards and provide evidence of quality through an application and assessment process operated by SSA and its network of agencies.⁶

⁵ For further information on the *Right Way*, please refer to: http://www.serviceskills.com.au/rightway.

⁶ Regulation of training organisations is managed by state and territory government registration authorities (SRAs), which audit against the prescribed standards contained within the Australian Quality Training Framework (AQTF). The "Right Way" program for the service industries does not replace or duplicate the role of these government bodies, nor does it introduce any additional standards for RTOs over and above those contained within the AQTF. SRA audits cover the whole of business operation for RTOs. The "Right Way" industry program uses the expertise of industry practitioners to check on and endorse RTO facilities. This important industry recognition supports RTOs to achieve quality delivery and is intended to support the work of regulators.

The core business of SSA is still to address the workforce development needs of our industries. Our input into improving the activity of trainers and assessors extends to supporting their capacity to ensure that the *right skills* are delivered in the *right time* and the *right way* for employers and employees. To the extent of our experience, encouraging providers to become more aware and knowledgeable of their industry—the businesses that they work with—is crucial if the needs of industry are to be addressed. Encouraging trainers and assessors to do this is a challenge for as many reasons, just as updating knowledge and skills in any other workforce is a challenge.

As an Industry Skills Council (ISC), Service Skills Australia believes that it has a key role to play in encouraging and rewarding those training providers who actively seek to improve their skills and knowledge. Service Skills Australia believes that the "Right Way" trainer and assessor program rewards behaviour that encourages greater industry connection. This takes the form of a 'points system' or continuing professional development program (please see Appendix One).

Moreover, the "Right Way" trainer and assessor program acts as a conduit for industry to clearly articulate the important areas to address in improving trainer and assessor work. It is an opportunity for industry to provide structured learning opportunities to trainers and assessors and, thus, encourages greater relationships and connectivity between industry and training providers.

Recommendation

In order to achieve improved quality outcomes, Service Skills Australia believes that the VET system requires greater industry involvement—in both the design and implementation of training (in a workforce development context).

Draft finding 7.2

Wage structures in the TAFE sector take no account of the relative scarcity of industry skills being sought. As a consequence, TAFE can find it difficult to attract and retain some VET trainers and assessors with particular industry skills without resorting to overaward payments, while other VET trainers and assessors may be paid more than is necessary to recruit and retain them as trainers and assessors.

Professional standing, rebranding and career pathways

As it is beyond the remit of ISCs to discuss industrial relations matters such as wages—in accordance with our responses cited in the Draft Report (7.22-7.24)—Service Skills Australia wishes to highlight other factors contributing to the difficulty of attracting and retaining VET trainers and assessors with sought-after industry skills.

The sector begs for more work to be done in regards to raising the status of VET. While SSA has obtained a copy of the final report from the 2008 Joint National Communications Project (JNCP)—which sought "to improve public perceptions of VET"—very little

information regarding the outcomes of this DEEWR-commissioned venture have since been promoted or made widely available to the public.⁷

In a related paper from the 2009 AVETRA conference, the author of the final report noted the following five "corrective action areas" collated from the four pieces of research DEEWR commissioned for the JNCP:8

- 1. **Increasing the status of VET**—improving the esteem held by key individuals and key influencers when comparing VET to other education options.
- 2. **Increasing the knowledge of VET**—improving general information about VET and the career options enabled by VET qualifications.
- 3. **Improving collaborative marketing of VET**—stakeholder collaboration and coordination for more effective VET marketing.
- 4. **Improving channels into VET**—improving and tailoring information about pathways into VET and 'decision support' services.
- 5. **Improving support for VET participants**—accessibility of support information for current students.

Additionally, among the seven macro issue categories developed by Harvey is "Inadequate VET branding strategy".9

Although the JNCP deals more with VET as a study option, these points highlight SSA's earlier concerns raised to the Productivity Commission regarding the branding and positioning of VET (in general) as well as the VET workforce. This has a likely profound effect on the job status (or "professional pride") associated with the VET workforce and, therefore, the ability to successfully attract and retain trainers and assessors who possess the desired skills. Furthermore, Service Skills Australia wishes to reiterate the need for improved awareness and promotion of the career possibilities within the VET workforce. Along with identifying a set of long-term career outcomes, this work would also go some way towards developing and establishing a sense of status (or pride) associated with trainer and assessor job roles.

Recommendation

Service Skills Australia reasons that a broader investigation of the factors affecting the attraction and retention of the VET workforce (beyond wages) is essential to ensuring workforce capacity and efficiency for the future. Service Skills Australia believes that this discourse may be further informed by the research outputs from the DEEWR-funded Joint National Communications Project.

⁷ Harvey, Paul (2008) "VET – An Integrated Marketing Action Agenda", from the *Joint National Communications Project*, DEEWR, September 22, 2008, p.4.

⁸ Harvey, Paul (2009) "Synthesising VET Market Research to Improve Real VET Participation", at the *AVETRA* 12th *Annual Conference*, Paper #59.00 (http://www.avetra.org.au/papers-2009/papers/59.00.pdf), pp.3-4.

⁹ Ibid, p.13.

Implications of a changing environment

Draft finding 8.3 (point 4)

There is evidence of a capability gap in the ability of some VET practitioners and enterprise trainers and assessors to assess RPL and RCC.

Recognition of Prior Learning (RPL)

Service Skills Australia welcomes the Productivity Commission's various observations regarding skills recognition, especially the identification of issues impeding increased uptake of RPL.

CURRENT ISSUES AND DIFFICULTIES

In a recent online survey run by Service Skills Australia to its national RTO database—all of which deliver service industries units/qualifications—respondents identified three critical barriers to greater utilisation of RPL:10

- Lack of understanding of RPL and lack of resources for assessors.
- Inequitable funding mechanisms.¹¹
- Current AQF requirements and inconsistencies with audit practices.

From the perspective of learners, some of the factors impeding the uptake of RPL identified by Smith and Clayton are:12

- a profound lack of student awareness of the existence of RPL
- a dearth of information overtly promoting RPL as an avenue to accessing training
- learners devaluing their own experiential learning in comparison to formalised methods of learning
- its reputation as a process that is notoriously complex and costly in nature, and
- the nature of language employed in its associated documentation, and the degree of literacy and communication skills required to adequately decipher what is being asked of the RPL participant.

Further to the final point, it has been argued that RPL (in its present design) lacks relevance to those who have experienced lengthy periods away from the formal education system and/or the paid workforce. Although RPL is aimed at capturing learning that has

¹⁰ This survey, *Recognition of Prior Learning (RPL)*, was sent to 3435 participants and yielded a response rate of 8.7% (298).

¹¹ In seven of the eight states and territories, the proportion of responses indicating that government funding "is relatively easy to access" was less than half—the only exception (Victoria) was marginally higher at 52.9%. To further highlight the difficult experienced by RTOs, six states/territories reported less than 40% and four states/territories less than 30%.

¹² Smith, Larry and Berwyn Clayton (2009) Recognising non-formal and informal learning: Participant insights and perspectives, NCVER, pp.6-7, 11.

occurred in non-formal and informal settings,¹³ the process itself is couched in a (seemingly foreign) language and structure borne out of formal education.¹⁴ As a result, Cameron contends that skills recognition is more conducive to being adopted by people who "work full-time, are established in the workforce and already have significant educational capital to draw from".¹⁵

CAPABILITY IN RPL

These negative outcomes draw attention to several immediate challenges to any attempts to increase the uptake of RPL. However, as highlighted by various participants in the Draft Report (8.24), the VET system must also commit to professional development for trainers and assessors in the application of RPL processes in order to adequately address these challenges.

Skills recognition is essentially about professional judgement. To reinforce the comments made by John Mitchell and Associates in particular (7.31 and 8.24), VET practitioners dealing with anything other than a 'straightforward case of RPL' must possess a broader set of skills in order to exercise the level of professional judgement required. Furthermore, although it is contra to many existing RPL evidence guides and processes, the candidate's role in RPL needs to be limited to knowing and showing what they do in their industry in order for skills recognition to better function.

MORE APPROPRIATE RPL PROCESSES

This draft finding (8.3, POINT 4) is of great interest to SSA as one of our recent workforce development projects—*Discuss, Display, Do*—is concerned with piloting a fully-facilitated RPL model. This is based on a professionally-oriented face-to-face conversation between the assessor and candidate that incorporates three essential steps:

- 1. <u>Discuss</u>: the assessor asks the candidate a series of questions that relate to their work and life experiences (i.e. non-formal and informal modes of learning).
- <u>Display</u>: the assessor asks the candidate to provide any documents and/or materials that relate to their experiences—including job descriptions, performance appraisals, formal reports from workplace supervisors, etc.
- 3. <u>Do</u>: the assessor asks the candidate to demonstrate how they can do a task or activity, which may also involve further discussion or questioning.

Designed for the service industries, the most significant difference with this model is that the burden of proof rests with the assessor (not the candidate) in order to adequately unpack their previously unrecognised skills and knowledge. This is especially practical as

¹³ ABS (2007) 4229.0 – Adult Learning, Australia, 2006-07, pp.28-36; Regarding the types of training often undertaken in relation to the workforce, the ABS identifies three categories: formal learning (i.e. activities that lead to a qualification); non-formal learning (i.e. structured activities that do not lead to a qualification), and; informal learning (i.e. unstructured activities outside of educational institutions such as on-the-job training).

¹⁴ Smith, Larry and Berwyn Clayton (2009) Recognising non-formal and informal learning: Participant insights and perspectives, NCVER, p.14; Halliday-Wynes, Sian (2009) "Keeping informal learning informal," in Quest (Issue 2, Winter 2009), Adult Learning Australia.

¹⁵ As cited in Hargreaves, Jo (2006) Recognition of prior learning at a glance, NCVER, p.6.

assessors—ideally industry-savvy specialists with a deep understanding of the workplace—are consistently more capable of deciding whether or not the information presented to them could be equivalent to a qualification or part of a qualification.

FURTHER WORK AND CURRENT OBSTACLES

Admittedly there is still much work that needs to be done in making RPL more accessible and, subsequently, more utilised. Notable items include:

- The application of flexible teaching and sophisticated assessment practices placing greater responsibility on assessors.¹⁶
- A more concerted effort to meet the needs of (non-RTO) employers.¹⁷
- An obligation to address the following issues primarily affecting RTOs:
 - perceived risks in relation to auditing
 - o potential for inconsistencies in assessments
 - lack of confidence that RPL assessments adequately reflect outcomes parallel to those achieved through a 'complete' training pathway, and
 - o the effort required to facilitate and complete the process.18
- A more concerted effort to meet the following needs of learners:
 - o clearer communication
 - o simplified processes, and
 - o tailored support (including guided reflection). 19

As highlighted in the Draft Report (8.23-8.24), statistics measuring the occurrence of 'successful' or 'granted' RPL are consistently low. Additionally, there is the issue of RTOs failing to offer skills recognition as it is no longer mandatory for RTOs to offer RPL under the Australian Quality Training Framework (AQTF)²⁰—hence the emerging opinion among vocational education and training researchers that RPL is "under-used".²¹

Despite these trends, it remains that learning—regardless of how, when or why it has occurred—can and should be accredited within the Australian Qualifications Framework (AQF) through a systematic and valid process. This reluctance to sufficiently service key areas of the population who are deficient in terms of skills recognition (in the context of being aligned to formal qualifications) is clearly less than ideal and offers much towards explaining the low uptake of RPL to date. Further complications arise from the sense that the phrase 'recognition of prior learning' itself implies a degree of 'recognition of formal learning'. This is, in part, likely to occur from preconceptions of learning and training

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 $^{^{16}}$ Halliday-Wynes, Sian and Francesca Beddie (2009) Informal learning: At a glance, NCVER, p.10.

¹⁷ Ibid.

¹⁸ Hargreaves, Jo (2006) Recognition of prior learning at a glance, NCVER, p.7.

¹⁹ Smith, Larry and Berwyn Clayton (2009) Recognising non-formal and informal learning: Participant insights and perspectives, NCVER, pp.6-7.

²⁰ Please note that NCVER's latest report on publicly-funded VET from 2010 shows that approximately one-fifth of all graduates (18.1%) and over one-quarter of all module completers (28.9%) indicated that—on enrolment—their training provider did not offer to assess their prior experience and skills related to their training: NCVER (2010) *Student Outcomes* 2010, pp.6.18.

²¹ Halliday-Wynes, Sian and Francesca Beddie (2009) Informal learning: At a glance, NCVER, p.10.

being wedded to institutions as opposed to those forms that occur informally (e.g. on-the-job) or non-formally (e.g. non-certified short courses).

Even with such obstacles to successful implementation, the criticism of RPL is consistently levelled at its existing *presentation* and *process* (rather than the actual *concept*)—the key problem being that "there is no 'one-size-fits-all' strategy" in order for increased utilisation of RPL.²² More to the point, **one size fails all**.

RPL models need to provide an easy-to-adopt framework that is flexible enough to cater to and deal with the specifics of individuals, their situation and their concerns. The system as it stands—including the statistics associated with it—paints a clear picture that RPL (for reasons many and varied) is not a worthy pathway for learners to undertake. Yet researchers note its vast potential as a "key plank in lifelong learning, a critical strategy for enhancing skill development and addressing skill shortages, and a mechanism for promoting equity and social inclusion".²³

ENHANCING WORKFORCE CAPACITY AND EFFICIENCY THROUGH RPL

Rather conveniently, as suggested in the Draft Report (8.12), RPL itself—if executed in the ideal way outlined above—may be one productive solution to speeding up the process of professional development (or 'up-skilling') for trainers and assessors, and subsequently increasing the internal capacity of the VET workforce. Indeed, the direct benefits experienced by those who participate in RPL process are many, with positives including:

- identification of skills and knowledge gaps
- reduced repetition and/or duplication of training
- formal validation of skills and knowledge acquired outside formal education
- reduction of study time and costs
- improvements in one's self-confidence, self-esteem, motivation levels and self-awareness, and
- enhanced employment prospects.²⁴

Moreover, some of these benefits also provide a direct advantage to any employer (existing or prospective) of these RPL participants—particularly those that impact on an individual's capacity to be efficient and productive in the work they undertake.

This adoption of RPL for workforce development purposes has proven to be a successful strategy in our *Discuss, Display, Do* project where the fully-facilitated RPL model has been piloted within the Federation of Parents and Citizens' Associations of New South Wales (P&C). This process has included 'gap' training and involved over 100 participants in four priority regions across the state.

The full reports for *Discuss, Display, Do* from Service Skills Australia and the P&C are due to be published by June 2011.

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²² Young, Colleen (Ed.) (2004) "RPL can build on a solid foundation," in *Insight* (Issue 15, August 2004), NCVER, p.4.

²³ Smith, Larry and Berwyn Clayton, (2009) *Recognising non-formal and informal learning: Participant insights and perspectives*, NCVER, p.11.

²⁴ Ibid, pp.12-13.

Recommendation

Service Skills Australia argues that there is an explicit need to re-evaluate the recognition of prior learning policy (including the name). At present RPL is underused and irrelevant to the needs of the nation's learners. Processes for **skills recognition** that are not so heavily reliant on evidence in hard copy format will help employees and remove barriers to participation.

Additionally, the education system(s) needs to create and offer a range of flexible skills recognition models—like the *Discuss, Display, Do* skills recognition model—in tandem with funding models that cater for the flexibility inherent in these RPL processes.

Finally, Service Skills Australia calls for support to have RPL re-stipulated as a mandatory requirement. This will undoubtedly facilitate greater awareness of skills and knowledge previously unrecognised by qualifications, greater engagement with VET, and greater utilisation of skills within the Australian economy.

Draft finding 6.1

Over the medium term, in the context of a tightening labour market, the VET workforce will be expected to deliver a great volume of training, increase the quality and breadth of its training, cater for a more diverse student population, and operate under a more contingent and contestable funding system.

Skills policy agenda

Service Skills Australia agrees that an expected outcome from delivering on COAG's skills-deepening policy (6.7-6.8) is the need for more 'vocational educators' with the necessary skills for delivering the inevitably higher volume of training—including greater capacity and capability for the delivery of skills recognition (i.e. RPL and RCC).

Moreover, Service Skills Australia supports the Productivity Commissions comments regarding the greater provision of language, literacy and numeracy skills (LLN)— particularly that a greater knowledge of teaching theory and practice may be required, as well as the provision of resources for locating and assessing those in need of such training (6.9).

Student and industry expectations

Enhancing skills for volunteer roles

Service Skills Australia appreciates the Productivity Commission taking the initiative to identify students looking to "enhance skills to bring to volunteer roles" as an additional audience and consumer of the VET system (5.2).

Given that the ABS identifies sport and recreation organisations—one of our industries—as having the largest share of the nation's self-identified volunteer numbers, volunteering involvements and annual hours of voluntary work, the initial estimates produced by the Productivity Commission in the Draft Report are of great interest to our organisation.

Recommendation

Service Skills Australia encourages the expansion of NCVER's Student Outcomes Survey (SOS) to formally include the category "to get skills for community/voluntary work" in its listing of the main reasons cited for undergoing training.

Skills utilisation

As an extension of the discussion on "Skills supply-demand mismatch" (5.12), SSA advocates for a broader discussion with industry on the issue of 'skills utilisation' (including its associated phrases 'skills mismatch', 'overskilling' and 'under-utilising skills'). At present, it is worth considering that the data on this topic is not so much evidence of poor skills utilisation by industry as it is evidence of industry's requirements needing to be better addressed through the education system.

Definitions of skill are contingent on the perspective that both the worker and employer bring to the delivery and utilisation of the skill. Early findings from a research project undertaken by the University of Ballarat (commissioned by SSA and forthcoming) demonstrate the range of perspectives given the context of who is measuring 'skill':

- Where 'all-round' perceptions were able to be accessed, it seemed that those in trade occupations viewed their jobs as more skilled than those in non-trade occupations.
- However, it was also the case that managers viewed the non-trade occupations as more skilled than the actual occupants of those jobs.
- Few participants were willing to entertain the notion that any jobs in the economy were without skill.
- Participants had different bases for their perceptions of skill in the researched occupations. Their perceptions were variously based on the amount of training required to do the job, the value that workers provided to people, the physical demands of the job, as well as the amount of time they spent interacting with people.

Indeed, as noted in the Draft Report, "Only in the last two years has the phrase 'skills utilisation' entered the general VET lexicon" (5.12). Therefore, until industry have a clear understanding of what is meant by terms such as 'skills utilisation' and 'overskilling', SSA would be cautious of providing feedback. Our experience to date is that the very definition of skill needs to be examined and industry's requirements should be understood first before examination of 'overskilling' and 'under-utilisation' can be understood.

By way of example, SSA wishes to highlight concerns with the practice of VET in Schools (VETiS) to illustrate how important it is that industry's skill needs are properly understood. Our recently completed research project in this area²⁵ indicates there are such fundamental differences in VETiS practice—resulting in inconsistent outcomes—that there is an urgent need to confirm a common purpose. Any discussion on 'overskilling' in such a context would need to first address a consistent purpose prior to engaging in a conversation about skills utilisation.

Recommendation

Service Skills Australia proposes that a more thorough discussion regarding the dynamics of defining 'skill' needs to occur before applying issues of 'skills utilisation', 'skills mismatch' and the like to the VET workforce.

²⁵ For final report on *Service Industries VET in Schools Project*, please visit: http://www.serviceskills.com.au/vet-in-schools

Appendix One: Right Way Trainer and Assessor – Policy for Program

Right Way Trainers & Assessors

Individual trainers and assessors who have the required industry experience, current vocational competencies and a qualification in training and or assessment can achieve industry recognition as a Right Way Trainer and or Assessor. To maintain this recognition, they must participate in professional development activities.

Using the Training Package as the Starting Point

Each service industry Training Package outlines stringent assessor requirements, outlined in the Assessment Guidelines document, which have been determined through the in-put of industry practitioners. It is an industry quality assurance requirement that trainers and assessors:

- have achieved a qualification in training and or assessment
- have relevant experience in the sector in which they are training and assessing vocational competence in various units of competency
- have comprehensive current knowledge of the industry, current industry practices and the job role against which performance is being assessed
- participate in industry specific professional development activities to update the currency of their industry experience

These requirements have been used as the basis for Right Way Trainer and Assessor recognition.

For some Service Industry Training Packages, assessors must also have achieved a vocational qualification (e.g. a hairdressing or beauty qualification).

The Right Way program facilitates all trainers and assessors to meet these important standards so that the service industries can be assured that practical development of student skills and knowledge is conducted by qualified trainers and assessors who know the current practices of the industry.

Training and Assessment Skills

Any Right Way industry recognised trainer or assessor will need to have a qualification in workplace training and or assessment. This ensures that they will have the planning, communication, competency based training delivery and assessment skills to effectively participate in the VET system.

Those who have a training and assessment qualification will be granted recognition as a Right Way Trainer and Assessor (provided they meet other Right Way standards).

Those who have a Statement of Attainment in Assessment will be granted recognition as a Right Way Assessor (provided they meet other Right Way standards).

Recognised trainers and assessors must engage in continuous improvement of their training and assessment skills.

Relevant Vocational Competence - Industry Experience

The V in VET is vocational and, in the context of the training system, it takes on the most basic definition. A vocation simply means a particular occupation, business, or profession—a job.

Vocational training involves teaching people how to do a job.

Industry holds a view that a trainer's ability to train and an assessor's ability to assess is directly linked to their vocational competence—they must have had experience in a job in order to teach someone else how to do it and to assess that they are doing it properly.

The service industries and the Right Way program, therefore, defines a vocationally competent trainer and assessor as one who has:

- actually worked in a job where they would have applied the particular Training package competencies that they will now use in training and assessment activities.
- sufficient breadth, depth and length of industry experience in their field of service industry operation
- industry experience that is specifically relevant to their current role in training and assessment. For example, fitness sector experience may not be useful if delivering and assessing in the field of outdoor recreation, food and beverage experience not useful for training front office competencies.

Currency of Industry Skills and Knowledge

Currency of vocational competence is crucial to the success of training and assessment outcomes for the service industries. It ensures that those involved in training and assessment processes have current industry knowledge, expertise in current operational practice and knowledge of what workplace equipment and resources are currently used so that training and assessment activities reflect up to date workplace practice.

Right Way recognition of trainers and assessors is based on currency of vocational competence which can be maintained through such activities as:

- recent and relevant part or full time employment in a commercial service industry environment
- participation in return to industry programs to achieve currency of vocational skills and knowledge
- participation in industry based professional development activities to update knowledge of current industry practice

Continuous Improvement of Training, Assessment and Industry Skills

Maintenance of status as a Right Way Trainer & Assessor is dependent on the trainer and assessor participating in professional development activities which will enhance their training, assessment and industry skills.

A Points System Applies to Right Way Trainers and Assessors

In order to maintain status as a Right Way Trainer and Assessor, participants must engage in professional development activities within the life of their registration which will:

- enhance their training and assessment skills
- enhance and update their industry skills and knowledge of current industry practice

Points are allocated to each of these activities and Right Way Trainers and Assessors must achieve points as follows:

Training & Assessment PD	Industry Skills PD	Total points
50 points annually	50 points annually	100 points annually
150 points over the previous three calendar years	150 points over the previous three calendar years	300 points over the previous three calendar years

A schedule of points is provided to each applicant.

Service Industries Professional Development Activities

Service Skills Australia (SSA) develops programs to enhance trainers' and assessors' knowledge and skills in key aspects of competency based training and assessment.

Other programs relate directly to current industry practice and any changes affecting the future operation of service industry businesses.

These are delivered either directly by SSA or by its network of agencies to ensure national coverage. A fee is charged for participation.

An annual program is planned and distributed to all interested trainers and assessors.

Points will be allocated to each program and SSA issues a certificate of attendance which indicates the points achieved. Renewing trainers and assessors can claim these points by providing a copy of this proof of attendance

Other Professional Development Activities

The Right Way program recognises a vast range of professional development activities available to service industry trainers and assessors. Again, SSA allocates points according to the type of activity and renewing trainers and assessors can claim these points by providing proof of attendance.

Trainer and Assessor Networks

SSA and its local agencies operate trainer and assessor networks, participation is free and all Right Way Trainers and Assessors are advised of how to participate in network activities. The purpose of these networks is to:

- provide a mechanism for the exchange of ideas and information on training and assessment practices
- moderate and validate assessment practices and tools
- provide coalface feedback on government initiatives and policy change

Trainers and assessors can also participate in other networks not operated by SSA. Participation in any network is encouraged; SSA allocates points and renewing trainers and assessors can claim these points by providing proof of regular participation.

Evaluation of Applications

Applicants will be assessed against the Right Way trainer and assessor recognition standards and evidence requirements.

Service Skills personnel will assess the applications to ensure that applicants have the appropriate training and assessment qualification and that renewing trainers and assessors have participated in sufficient professional development activities to maintain Right Way recognition.

However, SSA personnel may or may not have had current industry experience in the field relevant to the applicant trainer and or assessor. Particular job tiles and associated duties may be unfamiliar to them.

Assessments will, therefore, involve industry practitioners, known as Industry Advisors who are currently working the particular sector relevant to the applicant trainer and or assessor. Their role is to:

- validate that the applicant has had relevant industry experience in the field in which they are training and assessing. (field may be tour guiding, commercial cookery, nail artistry, personal training etc)
- validate that they have actually worked in a job where they would have applied the particular competencies relevant to their training and assessment activities
- assist SSA personnel to identify the relevance and value of professional development activities undertaken by renewing applicants

Any Service Skills Australia (SSA) personnel and Industry Advisors involved in a trainer and assessor evaluation will use consistent guidelines and checklists which are derived from the relevant Training Package and the trainer and assessor recognition standards.

Period of Right Way Recognition and Renewal

Right Way Trainer & Assessor recognition is granted for an initial period of three years and can be renewed for subsequent three year periods. Applications for renewal should be lodged no later than two months prior to the expiry date of recognition. Applicants renewing will be required to provide evidence of professional development activities undertaken with the preceding three year period.

Standards for Right Way Trainer & Assessor Recognition

Standard 1: Right Way trainers & assessors are qualified in training and or assessment

- 1.1 A Right Way industry recognised trainer or assessor has a qualification in workplace training and or assessment.
 1.2 The Right Way program recognises the following VET training qualifications:

 TAA40104 Certificate IV in Training and Assessment
 - TAA40104 Certificate IV in Training and Assessment
 - TAE40110 Certificate IV in Training and Assessment
 - Any higher education degree in education which contains any of the abovementioned VET qualifications.

Those who have a training and assessment qualification will be granted recognition as a Right Way Trainer and Assessor (provided they meet other Right Way standards).

1.3 The Right Way program recognises the following VET assessment qualifications for those who provide assessment only services:

Statement of Attainment in Assessment from TAAO4 including all three of the following standards:

- TAAASS401A/B/C Plan and organise assessment
- TAAASS401A/B/C Assess competence
- TAAASS404A/b/C Participate in assessment validation

Statement of Attainment in Assessment from TAE10 including all three of the following standards:

- TAEASS401A Plan assessment activities and processes
- TAEASS402A Assess competence
- TAEASS403A Participate in assessment validation

Those who have a Statement of Attainment in Assessment will be granted recognition as a Right Way Assessor (provided they meet other Right Way standards).

1.4 A Right Way industry recognised trainer or assessor will have recent training and or assessment experience.

Evidence

Trainers and assessors will provide a copy of their qualification which must show a list of competencies and which must be certified as a true copy by a Justice of the Peace or Solicitor. They will provide details of recent training & assessment experience.

The desk evaluation by SSA verifies the validity of the qualification and recency of training & assessment experience.

Standard 2: Right Way trainers & assessors have the relevant vocational competencies

2.1 Recognised trainers and assessors have relevant industry experience in the service industry competency field in which they are training and assessing. (Fields are nominated in competency standards e.g. floristry design and construction, fitness, events, food and beverage, nail services.)

In order to successfully train and or assess, they must have experience in workplace application of the specific units of competency. This means they have actually worked in a job where they would have applied the particular Training package competencies that they will now use in training and assessment activities.

- 2.2 Recognised trainers and assessors will have sufficient breadth, depth and length of industry experience in their field of service industry operation.
- 2.3 Relevant industry-based supervisory and or management experience in the field would be of benefit but this is not a condition of recognition.
- 2.4 A vocational qualification would be of benefit for all applicants but is only a condition of recognition as follows:
 - Trainers and assessors for Beauty
 - Trainers and assessors for Hairdressing

Full details are contained in the Beauty and Hairdressing Competency Standard & Qualification Checklists.

Evidence

Trainers and assessors provide evidence of relevant industry experience in a range of jobs where they would have applied the particular Training package competencies to be used in their training and assessment role.

This may include such things as:

- employment or consultancy contracts
- statements of employment
- job descriptions
- references

Trainers and assessors will provide a description of their job activities and length of service in each job to demonstrate a breadth, depth and length of industry experience in their field of service industry operation.

Where required, Trainers and assessors will provide a copy of their vocational qualification which must show a list of competencies and which must be certified as a true copy by a Justice of the Peace or Solicitor.

The desk evaluation by SSA and Industry Advisors verifies the relevancy of vocational competence and breadth, depth and length of industry skills and experience.

Standard 3: Right Way trainers & assessors engage in continuous improvement of their training and assessment skills.

- 3.1 Recognised trainers and assessors must engage in continuous improvement of their training and assessment skills on an annual basis.
- 3.2 The Right Way program recognises the following types of professional development activities for VET trainers and assessors:
 - a program operated by a state or territory recognition authority (15 points)
 - a public program operated by any public or private Registered Training Organisation (15 points)
 - a private in-house program operate by any public or private Registered Training Organisation specifically designed as a professional development activity for employed or contracted trainers and assessors (15 points)
 - participation in trainer and assessor networks (15 points)
 - a program operated by Service Skills Australia or its local agent (25 points)
 - enrolment in a VET or higher education course which provides a qualification exceeding the Certificate IV in Training and Assessment e.g. a Diploma, Vocational Graduate Certificate, Vocational Graduate Diploma covering VET competencies, a Bachelor of Education (25 points)

The subject matter of any of the above mentioned programs must be specifically designed to enhance **training and assessment** skills.

3.3 Renewing recognised Trainers and Assessors must achieve a minimum of 50 Right Way points annually and a minimum of 150 points over the previous three calendar years.

Evidence

Trainers and assessors provide a copy of any documents that substantiate their participation in professional development activities. This may include such things as:

- enrolment documents
- tax invoices for fees
- Certificates of Attendance
- qualifications or Statements of attainment

Trainers and assessors provide a description of the activity or any brochure materials which describe the activity.

The desk evaluation by SSA verifies the participation in and validity of the professional development activity.

Standard 4: Right Way trainers & assessors maintain current vocational competence

4.1 All recognised trainers and assessors have current industry knowledge, expertise in current operational practice and knowledge of what workplace equipment and resources are currently used so that their training and assessment activities reflect up to date workplace practice.

The Right Way program recognises that some recognised trainers and assessors will maintain part or full time employment in industry and work for an external RTO on a part time basis.

They may also be working in a service industry job and provide in-house training and assessment activities to other employees.

The Right Way program will allocate 85 points annually to those trainers and or assessors who have regular recent and relevant paid work on a part or full time basis in a relevant commercial service industry environment.

- 4.2 Recognised trainers and assessors must engage in continuous improvement of their industry skills and knowledge on an annual basis.
- 4.3 The Right Way program recognises the following types of professional development activities for those VET trainers and assessors *not* currently working on a part or full time basis in a commercial service industry environment:
 - participation in return to industry programs to achieve currency of vocational skills and knowledge (15 points for one to two weeks, 30 points for three to four weeks)
 - regular participation in training and or assessment activities conducted in the workplace (30 points).
- 4.4 The Right Way program recognises the following types of industry based professional development activities, for *all* VET trainers and assessors, to enhance and update their industry skills and knowledge of current industry practice:
 - involvement in professional industry networks, memberships, trade shows, events competitions etc (15 points for three different activities)
 - conduct of relevant projects and research activities in conjunction with or on behalf of industry (15 points)
 - a private in-house program operate by any public or private Registered Training Organisation specifically designed as an industry update activity for employed or contracted trainers and assessors (15 points)
 - an industry program operated by Service Skills Australia or its local agent (25 points)
 - enrolment in a VET or higher education course which provides a vocational qualification which is higher than one currently held e.g. upgrade from a Certificate III to a Certificate IV in any service industry qualification. (25 points)

The subject matter of any of the above mentioned activities must be specifically designed to enhance and update industry skills and

knowledge and must be relevant to the service industry field in which the trainer and assessor operates.

Evidence

Trainers and assessors provide evidence of current industry employment in a part or full time job where they will be currently applying the particular Training package competencies relevant to their training and assessment activities

Trainers and assessors provide evidence of return to service industry programs in which they have been engaged in workplace activities relevant to their training and assessment activities.

This may include such things as:

- employment or consultancy contracts
- statements of employment
- iob descriptions
- references

Trainers and assessors provide a copy of any documents that substantiate their participation in professional development activities. This may include such things as:

- copy membership card for professional associations
- copy of accreditation confirmation
- copies of brochure materials
- enrolment documents
- tax invoices for fees
- certificates of attendance
- qualifications
- Statements of Attainment
- published articles
- research reports

Trainers and assessors provide a description of the activity or any brochure materials which describe the activity.

The desk evaluation by SSA Industry Advisors verifies the participation in and validity of the professional development activity.

Points for Trainer & Assessor PD Activities

In order to maintain status as a Right Way Trainer and Assessor, participants must engage in professional development activities within the life of their registration which will:

- enhance their training and assessment skills
- enhance and update their industry skills and knowledge of current industry practice

Points are allocated to each of these activities and Right Way Trainers and Assessors must achieve points as follows:

Training & Assessment PD	Industry Skills PD	Total points
50 points annually	50 points annually	100 points annually
150 points over the previous three calendar years	150 points over the previous three calendar years	300 points over the previous three calendar years

Continuous Improvement of Training and Assessment Skills

Professional development activities specifically designed to enhance training and assessment skills.	Points per program annually
A program operated by a state or territory recognition authority	15
A public program operated by any public or private Registered Training Organisation	15
A private in-house program operate by any public or private Registered Training Organisation specifically designed as a professional development activity for employed or contracted trainers and assessors	15
Participation in trainer and assessor networks	15
A program operated or endorsed by Service Skills Australia or its local agent	25
Enrolment and significant participation in a VET or higher education course which provides a qualification exceeding the Certificate IV in Training and Assessment e.g. a Diploma, Vocational Graduate Certificate, Vocational Graduate Diploma covering VET competencies, a Bachelor of Education.	25

Maintenance of Current Vocational Competence

Professional development activities specifically designed to enhance and update industry skills and knowledge.	Points per program annually
Involvement in professional industry networks, memberships, trade shows, events competitions etc.	15 for three different activities
Conduct of relevant projects and research activities in conjunction with or on behalf of industry.	15
A private in-house program operate by any public or private Registered Training Organisation specifically designed as an industry update activity for employed or contracted trainers and assessors.	15
Participation in return to industry programs to achieve currency of vocational skills and knowledge - for one to two weeks (only for those VET trainers and assessors <i>not</i> currently working on a part or full time basis in a commercial service industry environment).	15
An industry program operated by Service Skills Australia or its local agent.	25
Enrolment in a VET or higher education course which provides a vocational qualification which is higher than one currently held e.g. upgrade from a Certificate III to a Certificate IV in any service industry qualification.	25
Regular participation in training and or assessment activities conducted in the workplace (only for those VET trainers and assessors <i>not</i> currently working on a part or full time basis in a commercial service industry environment)	30
Participation in return to industry programs to achieve currency of vocational skills and knowledge - for three to four weeks (only for those VET trainers and assessors <i>not</i> currently working on a part or full time basis in a commercial service industry environment)	30
Those trainers and or assessors who have regular recent and relevant paid work on a part or full time basis in a commercial service industry environment.	85