



## Industry Engagement in Training Package Development

### INTRODUCTION

This submission is made by the Victorian TAFE Association (VTA). The VTA is the peak body for Victoria's public VET providers. VTA members include four dual sector Universities, twelve stand-alone public TAFE institutes and as an Associate Member AMES. Services provided by VTA to members include public policy advocacy, workforce relations advice, and representation, education projects, research, government liaison and representation, and professional development.

VTA is an Associate member of TAFE Directors Australia (TDA). This submission is made in collaboration with TDA. The submission is informed by a focus group of VTA members and member review. VTA members may make submissions individually on matters of particular interest to them.

It is opportune to review the current model for the development and maintenance of Training Packages however VTA maintains that while there is room for improvement the current arrangements carry a level of support. Evidence available from "Summaries of VET Reform stakeholder engagement workshops", the publically available record of the national consultations on VET Reform includes only two references to concerns over the ability of ISCs to effectively develop training products. This is out of approximately 200 bullet pointed "key issues" and "key ideas for reform" that were collected by Department of Industry staff from VET sector stakeholders in all States and Territories in March 2014.

This submission responds to the Discussion Paper *Industry Engagement in Training Package Development*. VTA will also respond to the accompanying Paper, *Review of Training Packages and Accredited Course*, in early 2015.

### RESPONSE

VTA understands that the Government supports a contestable model for training package development that achieves the objectives of:

- Ensuring all industry has a voice in the development of the qualifications
- effective systems and processes to ensure employers feedback is incorporated into the development of the qualifications
- nationally recognised qualifications meeting local needs
- qualifications meeting quality standards, and
- a value for money proposition for VET stakeholders and governments

It is opportune to review the current model for the development and maintenance of Training Packages however VTA maintains that while there is room for improvement the current arrangements carry a level of support. Evidence available from "Summaries of VET Reform stakeholder engagement workshops", the publically available record of the national consultations on VET Reform includes only two references to concerns over the ability of ISCs to effectively develop training products. This is out of approximately 200 bullet pointed "key issues" and "key ideas for reform" that were collected by Department of Industry staff from VET sector stakeholders in all States and Territories in March 2014.



VTA support the central contention that industry should play a lead role in defining the industry standards (competencies) that are required by people working in an industry at a prescribed level. National training products need to enhance workforce capability as a national priority including transferable skills and soft skills.

VTA advocates that RTOs as the educational experts in the delivery and assessment of qualifications, should have substantial input into the development process. TAFE institutes and dual sector Universities across Australia offer qualifications and skills sets from the vast majority of Training Packages and have long histories developing accredited courses. The qualifications offerings span the AQF level 1 - 9. As educational professionals TAFE and dual sector University staff have deep understandings of vocational education and training and the pedagogy to respond to the diverse needs of industry. Their expertise is in the design and delivery of the learning and assessment to meet the requirements of the Training Packages. Staff at RTOs are required to be industry current. The connectivity of staff to industry needs is assured through the standards for NVR registered training organisations.<sup>1</sup> They have demonstrable skills in working with industry. This was very evident in research conducted by Dr John Mitchell for TDA leading to five case studies across different industries and different states and territories.<sup>2</sup>

An essential feature of any industry-defined qualifications must include educational expertise including whether units of competence are deliverable and assessable. There is a fundamental difference between a set of industry standards and the document that is designed to provide benchmarks for delivery and assessment against these competency standards. Educational expertise will bring an essential dimension to the development of training products. The discussion paper is silent on how to incorporate educational perspectives in the development process. This oversight needs to be addressed in whatever approach to change is finally adopted.

Other essential features of industry-driven qualifications and attributes for Training Package Development are included in commentary responding to each of the three approaches to procuring training package development.

## THE APPROACHES

The limited detail provided for each model again makes providing comment difficult. This submission is framed in the current context of training packages. It is very difficult to provide useful comment on the models (the how) when the nature of “training products” – (the what) is under review and may well be redefined. Different training products require different processes and the availability of different capabilities for their successful development i.e. should the new training products that are to replace Training Packages more closely resemble a higher education curriculum then the developers would need the skills and educational expertise more akin to a higher education faculty and not the current skills and capabilities of ISCs which do not have and are not required to have educational expertise.

---

<sup>1</sup> <http://www.asqa.gov.au/about-asqa/national-vet-regulation/standards-for-nvr-registered-training-organisations.html>

<sup>2</sup> **TDA case studies** "Reinventing service delivery - TAFE meeting industry needs and government goals" (by Dr John Mitchell, Feb 2013)



## **APPROACH 1: TRAINING DEVELOPMENT PANEL**

### **Features:**

The Australian Industry Skills Committee will “set priorities for the development and maintenance of industry-defined competencies in the form of Training Packages and skills sets”.

Industry training co-ordinators, based in the Department of Industry, will draw on a pool of technical writers from the Training Development Panel.

“The level of industry support and the potential for private financial contribution would be an important criterion for determining priorities for development and review of Training Packages”

Priorities for development and review of Training Packages will be set by the Commonwealth Department.

### **Comment:**

While this approach has the advantages of greater coordination across industry sectors and a level of independence from dominant industry voices, it may prove costly for small enterprises to commit time and effort resulting in limited engagement. Further it fails the test of continuity and stability. time and effort resulting in limited engagement. Approximately 85% of Australian enterprises are SMEs often they these don't have the capacity or there is difficulty in engaging them to provide a sound broad perspective of an industry's view. These voices must be heard in the development of training products.

The discussion paper is unclear if the industry training coordinators are within the government department though it is reasonable to assume that would be the case. VTA is not confident that there would be continuity of individuals in the roles of industry training coordinators. Ongoing relationships with industry would inevitably be impaired where longer term relationships cannot be developed with individuals. The governance arrangements as described in the discussion paper are simplistic and lack an appreciation of the complexities of prioritising the development and review of Training Packages. A revolving door of representatives to the Australian Industry Skills Committee must also be avoided.

VTA is concerned that the approach completely overlooks the critical underpinning development of language, literacy and numeracy skills and the ‘soft’ skills or graduate attributes associated with employability and heightened productivity.

A model based on industry sector committees could lead to Training Packages being developed in isolation and miss the opportunity to create efficiencies where competencies may be more efficient and effective (eg WHS).

This approach is not preferred by VTA.

## **APPROACH 2: INDUSTRY ASSIGNS RESPONSIBILITY TO PREFERRED ORGANISATIONS**

### **Features:**

Industry forms sector committees.



The industry sector committees would “represent their <the industry’s> skills needs and develop and maintain industry defined qualifications”

**Comment:**

This approach, as described in the discussion paper, lacks sufficient detail for VTA to support it.

It seems to be a blueprint for industry peak bodies or large enterprises to be the dominant voice. It is hard to see how the interests of smaller enterprise, the largest employers of Australian employees, would be heard.

VTA maintains that the criterion of “potential for private financial contributions” favours big employers and is a potential conflict of interest. An equitable process is required for the development of national training products to ensure independence of the training product. Capacity to pay should not drive development of training products.

Industry already provides input into the development and maintenance of Training Packages. Requests to provide additional financial input may be seen as too heavy an impost and drives some enterprises out of the nationally accredited VET system.

This approach is not preferred by VTA.

**APPROACH 3: GOVERNMENT CONTRACTS FOR DESIGNATED VET SECTOR BODIES**

**Features:**

Under this approach six (approx.) designated VET Sector Bodies would be established.

**Comment:**

VTA supports this approach in-principle. In our view such an approach will offer the widest industry engagement, will offer transparency and consistency. These industry sector bodies could engage across the sector and balance the needs of different industry groups, large and small. Additionally these bodies would have a capacity to reflect the national nature of Training Packages (or their replacement) and to work with the cross sectoral nature of qualifications. Technical competence is a pre-requisite for taking on the task of developing Training Packages but this goes hand-in-hand with an ability to write competency standards, to liaise with industry to elicit information and having a thorough understanding of the VET sector. Technical competence includes an intimate understanding of what a training package *is* (set of industry standards) and what a training package *is not* (a delivery plan for training and assessment). Approach 3 offers the best chance of harnessing all these attributes while ensuring the independence of developers.

The proposed lead VET Sector Body could develop quality policies and procedures across all VET sector bodies.

**VTA offers support for Approach 3 with the following caveats:**

1. **That RTOS are involved in the development and maintenance of all Training Packages throughout the development and sign off period to ensure that the packages are deliverable and assessable.**



2. That RTOs be regarded as “the peak industry” for the development of the Training and Assessment qualifications.
3. That strong controls need to be agreed and implemented to achieve compliance with standards for development of Training Packages, further streamlining and efficiencies in Training Packages and consistently high service standards from any new Designated VET Sector Body.
4. Access to some kind of ‘future scan’, including qualitative and quantitative research are required of the Designated VET Sector Body.
5. Membership of the each Designated VET Sector Body includes the requirement for high level educational and regulatory expertise.

#### KEY CONTACT

Nita Schultz  
Interim Executive Director  
Victorian TAFE Association  
E: [nschultz@vta.vic.edu.au](mailto:nschultz@vta.vic.edu.au)  
P: 0396398100

23rd December 2014