



Victorian TAFE  
*Association* Inc  
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# Victoria's Apprenticeship and Traineeship System: A Critical Analysis

*A submission to the Review of the Quality of Training in Victoria's  
Apprenticeship and Traineeship System*

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## Preamble

This submission is made by the Victorian TAFE Association to the Review of the Quality of Training in Victoria's Apprenticeship and Traineeship System – known as the Schofield Review. In particular, consideration will be given to whether or not the current Victorian vocational education and training (VET) system ensures quality educational outcomes for apprentices and trainees.

The Association is well placed to comment on these issues from the TAFE perspective. By way of introduction, this Association is the peak employer body for the TAFE industry in Victoria and we have as our members all of Victoria's TAFE Institutes and the four Multi-sector Universities. Our aim is to support and advocate for Victorian TAFE Institutes in their delivery of world class vocational education and training.

We have represented Victorian TAFE Institutes and Universities with TAFE Divisions in a number of inquiries and initiatives, at both State and Federal level. The Association's Executive Committee has undertaken considerable work in developing its own Vision for the Delivery of VET in Victoria, which includes consideration of the key objectives for the efficient and equitable delivery of vocational education and training, and a proposed model for the delivery of VET in Victoria.

Throughout all of these inquiries/reviews, while acknowledging the reality of fiscal constraints, the Association has stressed that the nature, needs and quality of the system must be the driving force for change, and not arbitrarily decided factors which have been deemed necessary to meet the fiscal demands of government. We have consistently illustrated the unique and worthwhile role TAFE Institutes play in both the provision of VET in Victoria and in terms of community development.

## Executive Summary

The Victorian TAFE Association welcomes the Review of the Quality of training in Victoria's Apprenticeship and Traineeship System. The issue of quality in relation to VET generally, but specifically in relation to apprentices and trainees, is an issue which concerns the Association and our members a great deal. Indeed, we have consistently argued that quality education outcomes must form the basis of public education.

This submission is structured into five parts which focus on the Terms of Reference as well the issues highlighted by Kaye Schofield in the discussion paper prepared for the Review.

Part 1 addresses the thorny issue of defining quality. It begins by critiquing prevailing understandings of quality, arguing that the number of student contact hours delivered in the system is not an accurate assessment of quality. It goes on to suggest that any assessment of quality must focus on education outcomes (as opposed to employment outcomes) and that quality provision of public education must take into account social equity considerations.

Part 2 examines the impact of the rapid growth and diversification of the New Apprenticeship system on the quality of training offered under that system. It argues that the rapid expansion has not taken into account the enormous administrative costs and requirements that have ensued. Furthermore, it questions the total policy focus on apprenticeships and traineeships arguing that, due to inadequate funding adjustments, other areas of VET delivery have suffered.

Part 3 addresses the shift in recent years toward a more competitive based model in the VET sector with the introduction of User Choice. While it reiterates the commitment of Victoria's public TAFE Institutes to User Choice, it is critical of its implementation in that it demonstrates that the competitive field is not level. This section also raises concerns about the impact of User Choice on quality in the sense that contracts are often awarded to the lowest bidder rather than the best provider.

Part 4 examines the concept of work-based learning and again, while reiterating a commitment to the concept of on-the-job training, is highly critical of solely on-the-job training. It argues that a combination of on and off-the-job training is preferable as it results in better educational outcomes and allows reciprocal monitoring.

Finally, Part 5 examines the difficult issue of auditing and, in reference to the recent PETE audits which indicated majority compliance, argues that majority compliance is not adequate. Quality systems aim for total best practice achievement, not partial compliance. This section also briefly outlines some of the possible instances of unethical conduct in the present system.

In essence, this submission suggests that the Victorian apprenticeship and traineeship system is at a cross-roads. Either the Government continues to focus the system on employment incentives, or, it shifts the focus to quality education and training. This requires significant conceptual and financial commitments. The Association is pleased to offer this submission as our contribution to that process and we look forward to being involved in the coming stages.

## PART 1: What is quality VET?

Assessments of the quality of VET, or indeed any form of education provision, are notoriously difficult and contested. There are a number of axes upon which one could measure the quality of the Victorian system, none of which can, in isolation, lead to a concrete assessment of the overall quality of the system.

However, what is clear at this point is what quality is not. In relation to the present system, and contrary to what this Association believes is problematically driving that system, quality does not equate to the quantity of student contact hours (SCHs) delivered in the system. The amount of training delivered is irrelevant if that training does not lead to positive educational outcomes.

One of the most disturbing trends in recent times in the VET sector, particularly in relation to apprenticeships and traineeships, is the focus of the system on employment incentives rather than positive learning outcomes. The consultation we undertook with our members for this Review suggested that this is one of the most pressing issues to be addressed in relation to the Victorian VET system.

Their concerns confirmed Dorothy Kotz' research and similarly, Kaye Schofield's research into the Queensland and Tasmanian VET systems, which found that the policy focus of the systems has become confused.<sup>1</sup> In her report on the Tasmanian system, Schofield points to the confusion generated by the seeming conflict between the employment interests of the Federal Government in relation to New Apprenticeships and the skills development objectives of the State Government.<sup>2</sup>

It is our firm belief that the focus of the VET system in Victoria must be on skills development, that is, on positive educational outcomes. Job creation and training are clearly not the same thing and must not be equated. While we have made this point previously to the Federal Government, for the purposes of this Review, we would like to take this opportunity to again concur with Schofield's recommendation that "traineeships ... should have training outcomes as their primary purpose and employment outcomes as a secondary purpose. Quality skills formation and not job numbers needs to drive the system."<sup>3</sup> Dressing up employment incentives with training rhetoric represents a misguided and irresponsible action by governments.

Furthermore, it must also be stressed that neither can quality be judged purely in relation to “efficiency” – that rather nebulous concept which has led to Victorian TAFE Institute’s acquiring a national reputation as slick entrepreneurial public education bodies. Along with the Institute’s business acumen, this reputation is also the result of the fact that the average price of delivery set by the Victorian Government for VET has been significantly lower than the national average for a number of years. It is our firm belief that rather than demonstrating the economic efficiency of the Victorian VET system, these figures reveal how severely under-funded it is. This is, in turn, an indicator of a lack of commitment by the former State Government to a *quality* publicly funded VET service.

#### **a) Quality Provision**

This Association has consistently stressed that quality as a concept in relation to an education system must relate to the quality of education *provision*. That is, while quality training is crucial to the system as a whole, it is only one part of provision generally. As we have argued in previous submissions to Government, due to the severe funding cuts and the inequitable structural funding arrangements our Institutes have been subjected to<sup>4</sup>, areas such as course and content development and student services have been affected and this has resulted in a decline in quality education *provision*. The call for increased funding is often overlooked in its predictability but this makes it no less relevant. While the quality of training offered by our Institutes is world-class, the dramatic funding cuts of recent years are taking their toll.

In short, what the Institutes do, they continue to do extremely well, but the range of educational services they can offer has been reduced under these funding cuts which has resulted in an overall decline in quality provision. Thus, while Victorian TAFE Institutes offer high quality training at a time of increasing fiscal restraint – which is testament to the sound infrastructure of the system generally – this Association has serious concerns about the capacity of the system to maintain or rebuild the overall quality if the severe funding shortages our Institutes have withstood are not reversed. Moreover, there are important equity considerations at stake as funding cuts impact further and further on the wages of Institute teachers.

On a federal level, the amount of Government spending on education in Australia as a proportion of the Gross Domestic Product is slipping below that of many of our neighbours. In the recently released OECD World Education Indicators, Australia ranked 21st out of 29 OECD countries in terms of the proportion of public expenditure on educational institutions.<sup>5</sup> On a State level, as mentioned above, Victorian TAFE is the most under-funded of all the states. It remains to be seen whether the current State Government will make serious attempts to rectify this situation and address the issue of quality v. efficiency by redressing the funding shortages to our Institutes.

#### **b) TAFE's social equity role**

We firmly believe that any assessment of the quality of a public education system must include social policy objectives – due to both the social justice and financial responsibilities of Government. It is this commitment to social equity objectives which, we believe, differentiates public and private TAFE in Victoria. For this and other reasons, we are concerned by the recent change in nomenclature in which TAFE now refers generically to public and private owned TAFE providers. This fails to take into account the very real differences in public expectations of public TAFE Institutes and their history of monitoring social equity objectives.

One of the principal findings of a recent inquiry by the House of Representatives Standing Committee on Employment, Education and Training was that “TAFE fulfils an important social responsibility by broadening access to education and training opportunities for the socially, economically and educationally disadvantaged.”<sup>6</sup> TAFE is very proud of its commitment to lifelong education for all Victorians and concurs with Chris Sidoti, Human Rights and Equal Opportunity Commissioner, that access to education is a fundamental human right which is the responsibility of Government.<sup>7</sup> As the recent UNESCO report *Learning: the Treasure Within* suggests, access to learning throughout life is the “key for equality of opportunity”.<sup>8</sup>

To this end, TAFE Institutes are committed to maintaining the service provision for equity groups including students from non-English speaking backgrounds, students with disabilities, the aged and Indigenous students who have limited opportunities to access education thus diminishing their

ability to fully contribute to the community. Indeed, students with disabilities constitute over six per cent of the TAFE student base<sup>9</sup> and Indigenous Australians are represented in VET training in excess of their representation in the population at large<sup>10</sup> which is to be highly applauded given that a post secondary qualification “increases employment prospects for Indigenous people by between 13% and 23%.”<sup>11</sup>

International comparisons bear out the suggestion that disadvantaged students seem to benefit from and participate in VET. While, for example, participation in VET in public high schools declined in the United States between 1982 and 1994, the exceptions to this rule were participation by black and NESB students whose participation levels increased and students with disabilities whose participation levels remained the same.<sup>12</sup>

Recent studies suggest that the contribution of such members of society is vital to the social and economic prosperity of Australia. For example, “[e]merging evidence shows that active and learning older people not only contribute to society directly, but also contribute indirectly by easing the economic cost of health care and associated services such as home care”.<sup>13</sup> Similar research on the cost of early school leavers – conservatively estimated cost the nation \$2.6 billion annually – bears this suggestion out.<sup>14</sup>

### **c) TAFE in regional areas**

*Regional development has become everybody's policy but nobody's program.*<sup>15</sup>

A large part of TAFE Institute's commitment to social equity policies is their contribution to rural Australia, which cannot be overestimated. TAFE Institutes are often a “vital part of regional life, regional community and certainly regional industry ... In regional Australia our Institutes are looked upon with great pride and ownership.”<sup>16</sup> Accordingly, TAFE Institutes in regional Australia contribute enormously to the social and economic growth of the region.

It is clear that there are major problems relating to access to quality education and training for regional Australians, particularly in isolated areas where many essential services such as schools and banks have closed in recent years.<sup>17</sup> This has severe social and economic ramifications for rural areas including high general and youth unemployment and the

“falling behind in their capacity to expand or attract business investment due to the restricted availability ... of skilled young people”.<sup>18</sup>

A strong regional Institute that has the capacity to offer a range of flexible and innovative training opportunities to its community has a significant effect on reducing the emigration of those seeking demographic stability of rural and remote regions and substantially reduces the financial and social burden on regional families who would otherwise be required to bear the cost of a metropolitan education.

Due to the critical importance of TAFE Institutes in rural Victoria, TAFE Institutes are best-placed to attract those people who are at risk of missing out on further education opportunities as a result of the most significant factors in creating educational disadvantage in Australia: a combination of rurality and low-socio-economic status.<sup>19</sup> The Institutes’ role in attracting such students is multi-faceted. As outlined above, the Institutes’ reputation and geographical proximity are important factors in securing this cohort. The other reasons are perhaps best described as cultural.

Studies have shown that the likelihood of a young person deciding to pursue further education is influenced significantly by their parent’s attitude to education.<sup>20</sup> Given TAFE’s commitment to *lifelong* learning via providing second chance education and the popularity of TAFE and CAE courses among mature members of society, one could commonsensically concur that as more and more parents re-enter the education system, a significant improvement in their regard for further education will result over time.

The trickle down effect of this cultural shift in attitudes toward education should not be underestimated, particularly in regard to the benefits to self-esteem that result from further education. Changing attitudes toward education is extremely important to the general well-being of disadvantaged groups which, in this context, include groups from low socio-economic backgrounds, rural and regional groups and Indigenous Australians. These cohorts face significant cultural (as well as financial) barriers in accessing further education which are gradually broken down as more people – particularly older, respected people – in the cohort enter or re-enter the education system. The rising instance of Indigenous students accessing VET training is indicative of this powerful cultural shift.<sup>21</sup>

The chance to increase educational opportunities for disadvantaged groups (taking into account the connection between education and self-esteem) is vital in a country such as Australia which has a significant youth and general suicide problem, particularly in rural areas. Indeed, nationally Australia's suicide toll is one of the highest in the world and exceeds the annual road toll.<sup>22</sup> As Senator Carr recently suggested in Parliament, if international studies are taken into consideration, the evidence does suggest that education has a positive effect on the physical and mental health (in regards to self-esteem) of socio-economically disadvantaged citizens and their children.<sup>23</sup>

To this end, assessments of the quality of the VET system in Victoria and its various components must take into account social equity considerations. Delivering low cost courses in low cost areas with limited commitment to student welfare and other services may well be economically efficient in the short term but we believe it represents a misguided decision in the long term for the state and the nation. As stated above, this is due in part to the social costs of ignoring the educational needs of disadvantaged citizens but it is also important to note that these costs are economic, particularly in the long term.

#### **d) TAFE's economic role**

The contribution that TAFE makes to the economic prosperity of Australia guarantees a responsive and contemporary training system, equipping Australian industry with the skills needed to compete globally. According to a recently released Australian Industry Group report, the skills of the Australian workforce "has long been internationally recognised as one of its key competitive strengths and is identified as one of the main reasons to trigger new investment."<sup>24</sup> This skill level needs to be maintained and constantly improved for the benefit of the social and economic health of the state and the country and this can only be achieved by a VET system focussed on quality education outcomes.

Furthermore, TAFE Institutes make a significant contribution to Australia's export income. National figures show that there were 40,978 international students at vocational education and training institutions in 1997, providing

over \$790 million in export revenue. It is estimated that \$350 million of this is provided in fees directly to the institutions, with much of the remainder spent on the consumption of goods and services.<sup>25</sup> The statistics also show phenomenal growth in international student numbers, which increased by 105% between 1993 and 1997.

Victorian estimates in 1997 looking at the total international student numbers show that in Victoria alone, more than 35,000 overseas students contribute over \$756 million annually to the State's economy.<sup>26</sup> Moreover, whereas Victoria TAFE Institutes are involved in training projects in more than thirty countries across the world, such as Thailand, the Philippines, Vietnam and China, these international student figures only include the revenue sourced from international students studying in Victoria and not from the revenue activity generated off-shore.

It is clear from these figures that the VET system is essential to the Victorian and national economies. Local and international public and industry faith in the quality of the system is crucial if this significant income stream is to be maintained. By failing to acknowledge the value of education to the nation and prioritising short term economic considerations, governments are putting the economic, intellectual and social prosperity of our state and country at risk.

PART 2:  
Growth and  
diversification  
of the New  
Apprenticeship system

Serious concerns have been raised about the effects on quality of the rapid growth of the apprenticeship and traineeship system in the research (mentioned above) into Queensland and Tasmania's VET systems. These concerns are aptly applied to Victoria. The fundamental issues at stake in relation to this issue are that the rapid growth is potentially indicative of a system focussed on quantity rather than quality and, that such enormous growth is likely to result in a "system ... in survival mode, not in a solid planning and management mode".<sup>27</sup> A discussion of these issues follows.

**a) Administration Issues**

Due to the Federal Government's policy focus on New Apprenticeships, the growth in apprenticeships and traineeships in Victoria has been enormous in recent years – 74.3% between 1998 and 1999. While such growth is widely applauded, it has had some serious ramifications for our Institutes not the least of which has been the increased administrative strains they have suffered. While RTOs, including TAFE Institutes, are not funded for the administration of apprenticeships and traineeships, they routinely do it. Again, as Schofield found in relation to Queensland's system, the administrative costs in this area are extremely high which led to her recommend that "[t]he User Choice funding schedule for 2000 should be amended to ... explicitly specify and cost the education and administrative services required of RTOs".<sup>28</sup> We call for a similar recommendation to be made in this Review.

**b) Public Expenditure**

At present, public funds dedicated to apprenticeships and traineeships constitute approximately one quarter of the total public VET funds, or for 1999, \$89 million. Most of these funds are contestable and approximately \$60 million of them were awarded to TAFE Institutes in 1999. In addition to this, individual students and sections of Industry also contribute significant amounts of money to traineeships and apprenticeships.

Clearly, "[t]raineeships (and apprenticeships) are expensive relative to many other forms of training such as institutional training, especially when direct government subsidies are factored in".<sup>29</sup> Thus, it is in the interests of all stakeholders in the system that the system functions so as to deliver quality outcomes and thus value for money.

In general terms, analysis in this area has been too focussed on relatively remedial considerations such as the number of SCHs delivered and the number of entrants into the scheme. If these considerations are paramount over and above quality education outcomes, and if the resultant de-skilling of the population is not of concern, then it could be argued that Government need not invest in the training aspect of New Apprenticeships at all. That is, if getting people off the unemployment queue is the impetus behind this scheme then surely there are cheaper options (in the short term at least).

### **c) Sacrificing Other Areas of Delivery**

Contrary to the perception that prevails in some sectors of the community, TAFE Institutes are not primarily centres for the acquisition of trade skills apprenticeships and traineeships. While apprenticeships and traineeships are an extremely important part of an Institute's profile, it is necessary to acknowledge that they constitute approximately 17% of the total SCHs delivered by TAFE and that TAFE Institutes perform varied roles in the provision of VET in Victoria including, but not limited to: vocational education; adult and community education; second chance education; and, special needs education.

One of the particularly difficult aspects of the policy focus on apprenticeships and traineeships has been the fact that as a result of federally directed funding arrangements, TAFE Institutes are obliged to offer training to all apprentices and trainees who apply to train with them. If the number of apprentices and trainees who enroll in any one year exceeds the funding allocated for their training, no commensurate funding adjustment is made.

Therefore, the Institutes have two options, the first of which is to reduce SCHs in non-trade areas and transfer those hours into apprenticeship programs. The consequence of this option is further compounded by the fact that apprenticeship and traineeship training is capital intensive and is thus far more expensive to deliver per SCH than most other courses. It is one thing to transfer hours, but this does not mean that there is an equivalent transfer of funding because the price paid for one SCH in apprenticeship training does not equate to the price of one SCH in non-trade courses.

Furthermore, if the Institute decides to reduce SCHs in non-trade courses to offset increased apprentice and trainee enrollment, they must do so on a compounded basis to compensate for the higher cost of SCHs they now must deliver. For the sake of illustration, the total purchase price of every Chainsaw/Forest Plant Apprentice was \$17.87 in 1999 compared with \$6.36 for Business Studies.<sup>30</sup> Therefore, to cross-subsidise a Chainsaw/Forest Apprenticeship, almost three hours of Business Studies would need to be sacrificed.

This option is obviously undesirable for all concerned. It narrows the breadth of courses offered by TAFE Institutes which represents a decrease in service provision to the community and Industry. One example of the many problems caused by this narrowing is the reduction in the number of SCHs available for delivery in Diploma courses, one potential effect of which is to disrupt articulation to Higher Education. Surely this is in itself antithetical to the Government's vision of Seamless Education?

The other option Institutes face in order to avoid under-delivery in non-trade areas is to cross-subsidise the cost of delivering Diploma courses through increased commercial activities. These significant policy shifts by the Federal Government in the area of apprenticeships and traineeships impose serious staffing and other resource ramifications upon our Institutes, as staff skills are generally not transferable between courses or within the time-frames of the Federal Government's objectives without necessary additional funding. The Government must take this into consideration when formulating training policy.

#### **d) Role Confusion**

The rapid expansion of the apprenticeship and traineeship system has also resulted in confusion about the roles of the various stakeholders in the system which has been further compounded by the introduction of User Choice and the resultant growth in the number of stakeholders. The crux of this problem is, as alluded to above, policy objective confusion. New Apprenticeships are marketed to employers as wage subsidies and as such, their "real" purpose – that is, training – is subsumed under employment and labour goals. This has resulted in many employers not being aware of their training and administration obligations in relation to trainees and apprentices.

Furthermore, ideological shifts in the system have caused confusion. De-regulation of the training market, for better or worse, has led to an identity crisis for both public and private education bodies. TAFE Institutes have had to become more commercially competitive while still maintaining their commitment to social policy objectives, and private providers have become part of the public education infrastructure and are publicly funded. The all-encompassing word TAFE is used to describe the two and the principal clients of the system – industry and students – are often left wondering what the difference is. It is our strong belief that there are tangible differences between the two which should be acknowledged.

Similarly, the traditional differentiation between traineeships and apprenticeships has become subsumed under the panoramic title of New Apprenticeships. The motives for the collapsing of these two quite different programs are not clear and, again, leads to confusion for the clients of the system, many of whom still conceive of apprenticeships in the former sense of a three or four year course combining on and off-the-job training with an employer and at a TAFE Institute.

PART 3:  
Cumulative Impact of  
market-like mechanisms

There has been considerable emphasis in recent times on the effect of the “User Choice” system which introduced significant levels of competition from private providers for VET funding in Victoria. While the Association believes that the maintenance of adequate public provision of VET through TAFE Institutes is essential to the health of every community, we also acknowledge that our Institutes are extremely competitive in the User Choice system. Contrary to suggestions that TAFE Institutes are unable or unwilling to compete with private providers, it is significant that “not one of the TAFE representatives who appeared before the [House of Representatives Standing Committee on Employment, Education and Training] attempted to argue that TAFE should not have to compete against other providers”.<sup>31</sup>

**a) Accountability Requirements**

What is of concern to our Institutes is that private providers should have the same accountability requirements that TAFE Institutes are subjected to by Government. During Ms Schofield’s consultation with TAFE Institute representatives for this Review, she suggested that, according to research by Coopers and Lybrand, public and private TAFE providers have roughly the same accountability requirements with the possible exception of industrial relations matters. We feel that such a suggestion requires clarification.

Firstly, it is important to note that if industrial matters are the exception to the rule, they constitute a large and important exception. The ability of public TAFE providers to compete economically has often been restricted by adherence to higher employment standards than is the case with most private providers because of the differences in award conditions and other industrial relations arrangements.

Moreover, we feel strongly that it would be difficult to justify the contention that public and private providers of education face the same community expectations – whether legislated or otherwise. It is expected that public TAFE will provide a wide range of essential student services such as career and student counselling, childcare, student welfare services, library services and disability and Indigenous support teachers. Many of these services are not deemed “economically efficient” by private providers, which arguably have more of a business culture than an educational one.

Similarly, public TAFE providers are committed to (and in any case are obliged to) offer concessions on fees to eligible students. In short, those TAFE Institutes with a high level of students eligible for a concession on their fees forgo a considerable amount of revenue which, in effect, disadvantages those Institutes which are arguably most in need of that revenue.<sup>32</sup> For example, according to our research, the Northern Melbourne Institute of TAFE, Victoria University and Swinburne University each forewent in excess of \$2 million income in 1998 due to fee concessions while overall, Victorian TAFE Institutes forewent almost \$18 million income in the same year.

The impact of fee concessions results from both State and Federal Government concessional entitlements. In the latter case, eligibility for concession on the basis of Commonwealth Health Care Cards has a significant economic impact on Institutes. The Commonwealth in particular, continues to pin so many of its social and equity programs on the expectation that TAFE will continue in its pre-eminent role as the provider of value-added products and services to the community. Neither the State (until recently) nor Federal Governments recognise the shortfall in revenue generated by the mandatory application of these concessional arrangements, which leads to the dichotomy of Institutes being asked to be commercially competitive while simultaneously differentially funding the Government's social welfare policy.

Whereas there is a dearth of publicly available information regarding the equivalent impact on private TAFE providers, it would be reasonable to assume (for reasons of conventional economic wisdom) that the incidence of students eligible for concession fees who enroll with private providers, on a *per capita* basis, would not be as high as with public providers. It is the Association's position that both State and Federal Governments should take responsibility for their social initiatives and provide further funding to Institutes for TAFE students who are eligible for concessions. The potential fees income foregone through fee concessions represents an overbearing burden on TAFE Institutes already straining under other funding constraints.

A further aspect of the community's expectation of public TAFE is that it will offer a wide variety of courses whether they are commercially competitive or not. This is particularly relevant in rural areas where student numbers

are often not sufficient to justify running a course in economic terms but where the community need and expectation is such that it is justified overall. Similarly, capital intensive areas such as engineering must be maintained – despite their costs – for the good of the nation and economy.

That is, public TAFE Institutes do not have the luxury of “cherry picking” their students and courses. Many disadvantaged learners require extra support and services and a number of courses in capital intensive areas are so expensive that, in the short term, they are not necessarily commercially viable. This does not justify the exclusion of such courses and learners unless we want to, as the often used phrase goes, “deepen the social divide” and end up with an oversupply of Business Studies graduates.

### **b) Competition and Cooperation**

Along with the under-funding of VET in Victoria, one of the less positive outcomes of User Choice has been the pressure it has placed on key education bodies. According to advice from the Office of Post Compulsory Education, Training and Employment (PETE), there are 995 RTOs in Victoria, excluding public TAFE Institutes. Many of these RTOs “receive government funds and they are competing fiercely to maintain or strengthen their market position.”<sup>33</sup> While this has arguably made public education bodies more accountable and while we are not advocating a return to a protected system, praise of this system needs to be tempered with the acknowledgement that competition often precludes cooperation. This can be to the detriment of service provision in the sense that institutional needs and sectoral interests may drive the system rather than the needs of the students in that system.<sup>34</sup>

### **c) Lowest cost delivery v. best quality delivery**

Though not intrinsic to the concept of User Choice, there is also growing concern that User Choice contracts are awarded on the basis of lowest tender price. Schofield’s research in Queensland found that “User Choice contracts are not awarded competitively according to the known quality of training resources ...”.<sup>35</sup> As suggested above, this belies the whole point of the VET system. If apprentices and trainees are not receiving quality training, what is the point of funding that training?

## PART 4: Work-based Learning

While we support Industry's call for on-the-job training, there is a question of balance to be addressed. That is, there must be an acknowledgement that none of us can "do it all". Off-the-job training at TAFE Institutes which provide monitored broad skills-based training by qualified teachers on a range of equipment has its place, as does so-called "hands on" and specific on-the-job experience. Perhaps the principal benefit of the combination of on and off-the-job training is that it generates reciprocal monitoring of quality and safety which is beneficial to the Training System at large.

Combined on and off-the-job training benefits both the employee and industry. The narrowing of the skills base of Australia's trainees and apprentices is of serious concern as it, in essence, represents a de-skilling of the workforce at a time when Industry is calling for higher skills. Furthermore, the employee loses in this system as their training is too specific and their skills base is not portable – thereby restricting their future employment potential.

A recent forum on "Employment, Work and Leisure" at the Research Centre for Vocational Education and Training found that "the greatest economic benefit for the country was likely to be found in improving the productivity of workers over their whole working life rather than in their current period of employment."<sup>36</sup> At present this is not occurring as the checks and balances to monitor quality educational outcomes are not in place. Therefore the standard of apprenticeships and traineeships is suffering which will only induce a further lack of confidence and investment by Industry in our apprentices and trainees.

The inadequacy of training offered to trainees and apprentices on-the-job is not necessarily or even likely to be the result of unethical employers. Rather, it is likely to be the result of their inability to provide the necessary time, equipment and teaching expertise to deliver and assess a "broad range of competencies, transferable skills and underpinning knowledge ..." particularly at AQF Levels 3 and above.<sup>37</sup>

There is sufficient anecdotal evidence (which, unfortunately we are restricted to due to the lack of research in the area) to suggest that underpinning knowledge is not being developed during much on-the-job training and training by private providers generally. We heard of many

instances in which trainees and apprentices, in order to progress to the next AQF level, come to an Institute for further training only to discover that they have not developed sufficient competencies in the previous level to continue. In many cases, the Institute then offers the necessary bridging training without commensurate funding.

PART 5:  
Audit evidence of  
poor/non-existent  
training

In the discussion paper prepared for this Review, it was stated that in 1999, 250 Victorian RTOs were audited by the State Government and the majority were found to be compliant. It is our firm belief that the fact that “the majority” were found to be compliant is not sufficient reason to applaud the system. Given the significant financial and social costs of non-compliance, even so-called small percentages of non-compliance are cause for serious concern – particularly due to the damage this non-compliance does to the reputation of the sector generally. A quality system aims for widespread best practice, not partial compliant practice.

Furthermore, these audits did highlight significant problems in relation to New Apprenticeships and delivery to overseas students. The principal areas of deficiency were said to be the use of inappropriately qualified staff and, delivery and assessment recording.

This Association has been advocating for a more strategic approach to auditing in the VET sector for some time due to our concerns about some private providers and service provision to overseas students in particular. Again, it is arguable that exploitation is inevitable when education bodies are encouraged to operate more like businesses than centres of learning. The latter does not preclude smart business practice but the focus of any publicly funded education body should be on learning outcomes and the conduct of that body must be consistent with the ethical and social justice responsibilities of the State.

While we welcome the strategic approach to auditing by PETE, we nonetheless remain concerned about the auditing process. Our concern has not led to the conclusion that increased rules and regulations are the answer. Nor will an increase in the number of audits conducted solve the quality issue alone – although we do believe that the overall audit findings must be tempered with consideration of the fact that only 250 out of just over 1000 RTOs were audited.

Schofield, for example, in her report on Queensland recommended that “VETEC/DETIR should ensure that by no later than March 2000, on-site audits have been conducted for at least three-quarters of all RTOs, to ensure their compliance with the ARF.”<sup>38</sup> In general, we believe that registration and compliance audits of RTOs must be tightened and that, in essence, a system which clearly defines and focuses on quality education outcomes must be developed. A discussion of the specific issues follows.

#### **a) RTO registration process poor and too “front end”**

One of the findings of Schofield’s previously cited research, particularly in Queensland, was that the RTO registration process was too “front end”.<sup>39</sup> That is, the system is focussed on registration compliance rather than delivery compliance. Once again, we are restricted to anecdotal evidence due to the newness of the current audit arrangements but such evidence certainly does suggest firstly, that the registration process is too front end in Victoria too and that the process itself is flawed. We have heard of many instances in which RTOs are ill-equipped and have insufficiently qualified trainers. In short, more rigorous preventative measures need to be put in place and the assumption that employers can and will provide adequate training (especially on-the-job) should not be made if we want safe workplaces that offer quality training.

#### **b) Problems with auditing arrangements**

As stated above, one of the central problems with auditing arrangements in Victoria is that the system has not clearly defined what the government is actually purchasing. That is, is it purchasing SCHs, reduced unemployment figures, training and/or quality training? To date, the system has functioned by measuring throughputs rather than outcomes.

One of the outcomes which requires serious review is whether or not competencies have actually been achieved. Our consultation with members for this Review suggest that there are sufficient instances of this not occurring to warrant further investigation into the issue. These discussions suggest that the “tick and flick” mentality is prevalent enough to cause concern.

A further outcome which is of concern is the completion rates for apprenticeships and traineeships. This is a complex area because, according to our consultation with PETE for the review, there is a lot of missing data in this area. Furthermore, we do acknowledge that there are several reasons that someone may exit training which have nothing to do with the quality of training and support they receive.

However, according to PETE, while there were just over sixty five thousand apprentices and trainees in training in 1999, just under twelve thousand

completed training in that same year. While these figures do not mean that the difference between the two figures is indicative of the number of people who have exiting training, the PETE consultant suggested that approximately one third to one quarter of apprentices and trainees complete their training. That is, up to three-quarters of those engaged in Victoria as New Apprentices do not graduate from their training. If the Government is seriously purchasing quality education outcomes this is of great concern.

### **c) Non-compliance with contracts & Training Agreements**

It is a well-known fact in the Victorian VET sector that many of the stakeholders in the system are unaware of their contractual obligations – especially in regard to Training Agreements. It is often argued that the apprenticeship and traineeship system is too complex and embroiled in red tape and that many employers and RTOs are unaware of the “fine print”. This argument is a precarious one in the sense that excusing non-compliance to contracts undermines the seriousness of the contract itself. In what other situation would an employer or individual sign a contract worth thousands of dollars without reading the fine print?

However, it is arguable that when Training Agreements are sold to employers as wage subsidies, there is bound to be little understanding of the training requirements and focus of the Agreement. The focus on marketing Training Agreements must therefore shift to training rather than employment.

Furthermore, one way to potentially alleviate the lack of understanding by employers of their obligations, is to make Training Agreements conditional upon their signing off by an RTO. Therefore, employers and trainees will have the opportunity to clarify their rights and responsibilities before money is exchanged.

### **d) Unethical practice v. illegal practice**

One of the issues that Ms Schofield raised during her previous research into Tasmania and Queensland, and during her consultation with TAFE directors for this Review, was the issue of illegal practice versus unethical practice in the system. She indicated that there seems to be confusion, for

example, about what constitutes sensible business practice and what constitutes unethical practice. In short, our response would be that while sensible business practice is important to the VET system, a focus on it to the exclusion of education principles is unethical. To this end, we concur with her prior recommendation that one of the purchasing principles of Government should be ethics and fair dealing.<sup>40</sup> A discussion of possible instances of unethical or unfair dealings follows.

#### *Registered Training Organisations (RTOs) as employers*

The effect of an employer being an RTO is often that the breadth of training offered to the trainee or apprentice is narrow and RTOs frequently only deliver training that is relevant to their core business. That is, an employer may require a particular skill to be performed and thus may train the employee only in that specific area. This costs them significantly less than employing a person who is already competent to perform the same job – not only because trainees and apprentices command lower wages, but because as both an employer of a trainee or apprentice and as an RTO they accrue twin subsidies from the Government.

Furthermore, the cost to the employer of providing broad-based training is unrecoverable except in the relatively unlikely event that that particular job requires all of those skills. Thus, there is a financial disincentive to provide training beyond that which is required in the short term for that particular business. This arguably constitutes sensible business practice for that business – in the short term at least – an approach which is often labeled as being responsive to the needs of Industry!

Questions arise here about just who “Industry” is. Is Industry (as is too readily assumed) a conglomerate of discreet employers? If that is the case, how can one speak with any surety about the views of Industry? In some industries, where there is unanimity of views, such a conclusion would be acceptable. However, it is well known that in industries with a more diverse cohort of employers it is unsafe to assume that such a single voice exists. Furthermore, whereas it is the views of industry – read Industry Associations – that promote the competency standards to be achieved, it is individual employers, often with what must be questionable competence to do so, that are called upon to assess the efficacy of the training outcomes.

When training is secondary to the operational needs of business, the engagement of trainees again becomes an employment issue rather than an education and training issue. The conflicting interests between the needs of an individual employer for whom “just in time” training may be adequate and their duty as a trainer to provide for the long-term needs of the “Industry” is clearly apparent. Training which focuses on the long-term needs of the Industry as a whole is essential to the health of the Australian Training System and Industry.

Training a highly skilled workforce ought not to be interpreted as training a narrow and specialist workforce. If we are serious about providing a training system that has as its goal a training culture embraced by all sections of Australian society, for the benefit of the workforce as a whole, then we must ensure that the existing system is not being corrupted by those with vested interests whose depth of commitment leads them only to aspire to the provision of “just in time” – “just for me” – specialist training.

#### *Group Training Companies as RTOs*

There is growing concern that some Group Training Companies (GTCs) are taking advantage of the User Choice system. Many Institutes reported incidents where students (and/or their parents) were concerned that they were not offered the choice to train with their local TAFE Institute. Anecdotal evidence suggests that some GTCs – contrary to User Choice principals – demand that their clients train with them. Of course, there are many quality ethical GTCs but again, this cannot be assumed.

#### *Private Brokers*

Concern was also expressed about the role of brokers in the recruitment process. When an individual who would like to become a trainee or an apprentice approaches a broker or is approached by a broker, they are often not sure of who they are dealing with. One could argue that because they are not education bodies, brokers prioritise economic imperatives over education ones and advise the potential trainee or apprentice on that basis. We have heard evidence of brokers failing to undertake proper selection and recruitment procedures in order to cut costs. They then sell traineeships to Registered Training Organisations which conduct employment and training counselling only to discover that the Trainee has

been guided into the wrong path and/or has insufficient skills. This is a costly error as by this stage; both the broker and the New Apprenticeship Centre (NAC) have received Government funding.

We heard further examples of brokers masquerading as NACs who approach employers and offer them money (that is, government employment incentives) without explaining their training obligations and costs. Thus, by the time of sign-up, the employer is irate and the RTO is left to iron out the problems. Moreover, by this stage, the employer's confidence in the system has potentially been undermined.

#### *NACs as RTOs*

There is also significant anecdotal evidence to suggest that a conflict of interest is played out by NACs who are also RTOs. That is, there is concern that User Choice principles are compromised in this situation due to the self-referral by such NACs regardless of whether or not they are the best RTO for the training. Furthermore, as Schofield suggests in relation to Queensland's system, "[t]here is a developing network of relationships among some NACs, RTOs and others which involve cross referral and/or commissions associated with Training Agreements. The effect of such relationships include the diminution of User Choice goals ..."<sup>41</sup>.

## CONCLUSION

The provision of VET through New Apprenticeships is an area which concerns this Association and our members a great deal and thus we welcome this Review. In general terms, we believe that earlier analysis in this area has been too focussed on (and thus sidetracked with) throughput considerations. While such considerations are important, we emphatically believe that what needs to be researched and mapped are the outcomes of this type of training. Outcome focussed research must be prioritised over and above the current more process oriented research.

Unfortunately, there is a distinct lack of this research and hence much of the evidence contained in this submission is anecdotal in nature, having been collected for this submission from our members. This is not to say that this evidence is not legitimate – indeed, anecdotal evidence is often far more qualitatively relevant than statistical evidence. However, we do recognise that sustained and long-term research into this area is required and suggest that the overwhelming anecdotal evidence on several issues could help steer that research.

In essence, we believe that the apprenticeship and traineeship system in Victoria is at a cross-roads. That is, we concur with Schofield that

*[g]overnments face a clear choice about the future of traineeships. If they want the traineeship system to serve as a job creation program with some useful training that meets immediate employer and employee needs, then they should make this objective explicit. They should then reduce complexity and cost by uncoupling the traineeship system from the NTF and the AQF and pay considerably less for the training.<sup>42</sup>*

However, we wholeheartedly believe that this path would be disastrous for the state and nation. The benefits of a quality public education system have been sufficiently championed elsewhere and need not be dealt with explicitly at this point. Indeed, they are commonsensical.

Furthermore, we suggest that there are two essential issues that are relevant to the apprenticeship and traineeship system and which must be dealt with swiftly. One is, of course, the issue of auditing. As suggested above, there is sufficient evidence to suggest that the RTO registration process is seriously flawed and that compliance audits are infrequent and insufficiently thorough. Recent audit evidence of “majority” compliance is

not sufficient to lead to the conclusion that the Victorian system is a quality system. Quality is guaranteed by best practice culture and compliance, not minimum audit compliance.

The second major issue is the type of training delivery. In short, we have argued cogently that the best form of delivery is a combination of on and off-the-job training as it results in the development of broad-based skills and reciprocal monitoring.

A quality VET system is crucial to the Victorian economy. While the system is relatively healthy – particularly in light of the fact that it has been so drastically under-funded for so long – there is significant room for improvement. The purpose of apprenticeships and traineeships needs to be clarified so that public and industry faith in the VET system can be maintained – and in some cases rebuilt. We welcome this Review as an important step in that process and look forward to the opportunity to further contribute to the debate.

## End Notes

- <sup>1</sup> In her research on VET, the Hon. Dorothy Kotz found that “[s]ome training programs have been offered in the past as a means to reduce unemployment statistics.” See, “Students and trainees in VET” *Market for Vocational Education and Training: who pays and who profits*. Adelaide: NCVET, p.302.
- <sup>2</sup> Kaye Schofield. *A Risky Business: Review of the Quality of Tasmania’s Traineeship System*. (December 1999) p.viii.
- <sup>3</sup> Kaye Schofield. *Independent Investigation into the Quality of Training in Queensland’s Traineeship System*. Department of Employment, Training and Industrial Relations (2 July 1999) p.vii.
- <sup>4</sup> See, Victorian TAFE Association. *The Quality of Vocational Education and Training: A Submission to the Senate Employment, Workplace Relations, Small Business and Education Committee*. (December 1999). See, “Part 2: An evaluation of the performance of TAFE”, pp.13-19.
- <sup>5</sup> OECD. *Education at a Glance: OECD Indicators 1998*.(Paris) p.31.
- <sup>6</sup> The House of Representatives Standing Committee on Employment, Education and Training (herein referred to as The Committee). *Today’s Training, Tomorrow’s Skills*. The Parliament of the Commonwealth of Australia (July 1998) p.26.
- <sup>7</sup> Margaret Alston. “Education and Training in Regional Australia.” *Regional Australia Summit Unit*. Centre for Research and Learning in Regional Australia, University of Tasmania (27-29 October 1999) p.2.
- <sup>8</sup> Jacques Delors. *Learning: the Treasure Within: Report of the International Commission on Education for the Twenty First Century*. UNESCO, Paris (1996) p.3.
- <sup>9</sup> Approximately 75 000 (or 6.1%) TAFE graduates in 1997 identified themselves as having a disability. National Centre for Vocational Education Research. *Exhibit No.25, p.49*.
- <sup>10</sup> See Australian Bureau of Statistics. *Education and Training in Australia*. (1998) p.54.
- <sup>11</sup> Professor John W Chudleigh. “Education and Training in Regional Australia.” *Regional Australia Summit Unit*. Centre for Research and Learning in Regional Australia, University of Tasmania (27-29 October 1999) p.4.
- <sup>12</sup> National Centre for Education Statistics. *Vocational Education in the United States: Toward the Year 2000*. U.S. Department of Education, Office of Educational Research and Improvement, (February 2000) p.vii.
- <sup>13</sup> Ian Falk & Sue Kilpatrick. “Re-focussing in Learning Regions: Education, training and lifelong learning for Australia’s well being.” *Regional Australia Summit Unit*. Centre for Research and Learning in Regional Australia, University of Tasmania (27-29 October 1999) p.8.
- <sup>14</sup> Anthony King. *The Cost to Australia of Early School Leaving*. Dusseldorp Skills Forum, Canberra (October 1999) p.1.
- <sup>15</sup> Mark Latham. “Government is lacking education policy.” *Financial Review* (22 November 1999).
- <sup>16</sup> Mr Ralph Clarke, Council President, Wodonga Institute of TAFE. *Transcript of Evidence*, p.307-8 in: Op.cit., The Committee, p.23.
- <sup>17</sup> For further explanation see, Op.cit., Margaret Alston p.1 and Op.cit., Professor John W. Chudleigh p.3.
- <sup>18</sup> Ibid., Professor John W. Chudleigh, p.1.
- <sup>19</sup> Ibid., p.3.
- <sup>20</sup> See Ibid., p.3.
- <sup>21</sup> National Centre for Vocational Education Research. “Indigenous students succeeding against the odds”. *Media Release* (17th November 1999).
- <sup>22</sup> See, *Table 9.3. International Comparison of Selected Causes of Death*, on the Australian Bureau of Statistics’ Web Page: [www.statistics.gov.au/](http://www.statistics.gov.au/).
- <sup>23</sup> Dr Bob Boughton, Co-operative Research Centre for Indigenous and Tropical Health at the Menzies School of Health and Research. Cited in, The Hon. Senator Kim Carr. *Federal Parliament of Australia – Hansard*. (22 November 1999) p.10257.
- <sup>24</sup> Australian Industry Group. *Training to Compete: The Training Needs of Industry*. Prepared by the Allen Consulting Group (1999) p.i.
- <sup>25</sup> National Centre for Vocational Education Research. *Overseas Students in Australia 1996/1997*.
- <sup>26</sup> The Hon. Phil Honeywood. *Ministerial Taskforce to Study Effects of Asian Currency Crisis on International Students in Victoria*. Media Release (October 1997).
- <sup>27</sup> Op.cit., Schofield, (Tasmania) p.vi.
- <sup>28</sup> Op.cit., Schofield, (Queensland) p.iv.
- <sup>29</sup> Ibid., p.iv.
- <sup>30</sup> Office of Training and Further Education. *1999 Purchasing Model: Purchase Price and Costing Codes*. Melbourne (December 1998).
- <sup>31</sup> Op.cit., The Committee, p.18.
- <sup>32</sup> See, Ibid., The Committee, p.xxv.
- <sup>33</sup> Geoff Maslen. “Schofield finds poor training in Victoria, too.” *Campus Review*. (March 8-14, 2000).
- <sup>34</sup> An example of this is the culture of competition that has developed between RTOs and secondary schools in the provision of VET in Schools. See, Victorian TAFE Association. *Increasing education opportunities for young people in Victoria: A submission to the Ministerial Review into Post Compulsory Education and Training Pathways*. (February 2000).

<sup>35</sup> Op.cit., Schofield, (Queensland) p.vi.

<sup>36</sup> Research Centre for Vocational Education and Training. *Pictures of the future: What is the future of VET? Summary papers from the National Issues Forum*. Sydney (21 June 1999) p.4.

<sup>37</sup> Op.cit., Schofield, (Queensland) p.44.

<sup>38</sup> Ibid., p.xi

<sup>39</sup> Ibid., p.x.

<sup>40</sup> Ibid., p.xiii.

<sup>41</sup> Ibid., p.37

<sup>42</sup> Op.cit., Schofield, (Tasmania) p.42.

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