National Career Development Strategy Green Paper

ACPET submission

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Established in 1992, the Australian Council for Private Education and Training (ACPET) is the national industry association for private providers of post-compulsory education and training. ACPET has 1,100 members nationally, delivering a full range of higher and vocational education and training (VET) and English language courses across all states and territories. As the peak body for private providers, ACPET is committed to ensuring that its policies, products and services contribute to an inclusive tertiary education system. A large proportion of ACPET members are Registered Training Organisations (RTOs) that operate within the national VET system.

In 2012, ACPET prepared its National Career Practitioners’ Engagement Strategy, in acknowledgement of the critical role that career practitioners play in helping students plan for and achieve their career and life goals. As part of this strategy, ACPET has formed strong alliances with key career sector associations, such as the Career Industry Council of Australia (CICA), the Career Development Association of Australia (CDAA) and the National Association of Prospective Student Advisers (NAPSA), together with a range of strategic partnerships at the local State and Territory level, eg ACPET VIC and the Career Education Association of VIC (CEAV).

ACPET welcomes the opportunity to comment on the range of questions raised for consideration in the Federal Government’s National Career Development Strategy Green Paper. In summary, ACPET recommends that the Australian Government:

1. must play a leadership role to enable the formation and execution of world class and responsive career development services for all Australians
2. must introduce a national leadership framework to provide improved and consistent consumer services
3. introduces national standards for all career practitioners, in order to provide accountability and improved consumer protection, including for international students
4. must establish and adequately resourced priorities through a National Career Development Strategy which support all Australians, in particular the most vulnerable, in their career transitioning, regardless of their age or location
5. acknowledges and supports the provision of career advice offered by private Registered Training Organisations (RTOs) as an integral student service in line with the National VET Requirements
6. ensures equitable access to government funded career services for all students, including those electing to study with a private VET and/or higher education training institution
7. supports employers to also better understand and engage with career transition and upskilling services, to build a stronger and more productive work force
8. assists and aids career practitioners to understand the Council of Australian Government’s (COAG) VET reform agenda and the implications for system users
9. consolidates all government funded websites and information sources into the myfuture.edu.au website
10. ensures that school curriculum includes processes to facilitate transition from school to working life, and
11. forms a national leadership body, made up of key stakeholders, to support the Strategy’s execution.
Question 1: Do you have any comments on what you see as the priorities and proposed direction for the National Career Development Strategy (refer to page 9)?

Transition in its various forms and at various stages in a person’s life is an important factor in successful and sustainable employment and ongoing career development. ACPET endorses the principles outlined within the paper on career development and transition, such as:

- career development is important for all Australians (p.1)
- career development is integral to achieving national economic and social goals, as well as an individual’s productivity and success (p. 1)
- career development is essential as a life-long activity (p.1), and
- career intervention needs to occur at the most appropriate time and in the most appropriate way (p.12).

The paper however does not provide adequate detail of priorities and directions for career development. A clearly defined vision, which supports the national agenda for career development would be a useful start. Following on, a range of defined priorities would enable the vision to be realised. ACPET believes that the strategy should focus on national leadership and increased sectorial governance arrangements.

Where the paper acknowledges the breadth of institutions that deliver career development advice and comments on the variable quality of this advice (p.6), it does not offer an approach to unify the sector nor provide the necessary accountabilities to achieve the raising of service provision standards. ACPET was interested to read of the various activities being undertaken in each State/Territory (p. 6-7), but firmly believes that a national leadership framework would be useful in supporting the strategy’s quest for delivery “in a consistent way across the country, regardless of the location or age of an individual” (p. 12). This framework should incorporate service and professional standards, which should in turn, be monitored at the local level.

The paper contradicts itself – despite claiming that career development should be available to all Australians, the proposed support mechanisms (p. 11-12) only appear to target young people. ACPET strongly recommends that these mechanisms are extended to the wider cohort, in particular to the most vulnerable. For example, strategies which provide improved access to relevant work experience and vocational learning experiences (p. 11) are essential for those returning to the work force and the unemployed. And perhaps the resources proposed to fund parent engagement strategies, could be widened to provide improved career information services for all.

Furthermore, the paper endorses that an individual requires career management skills as a necessary foundation for labour market flexibility and life-long learning (p. 1) in line with other OECD countries, yet fails to provide detail as to how this important cultural shift will be realised. In ACPET’s view, this approach would require a well coordinated and funded approach.
**Question 2: Do you have any comments on the possible direction for the Australian Government?**

The Australian Government’s role is essential in leading the formation and execution of world class and responsive career development services for all Australians. Through this activity, ACPET believes that the Government should enable cooperation amongst the various national, state and regional stakeholders.

As well, it has an important role to play to ensure that all Australians have access to professional and high quality career services. ACPET understands that this sector is not currently regulated. Through the planning of the *National Career Development* Strategy, it is timely that the Australian Government considers legislating the sector, to eradicate ad hoc service provision and raise the consistency and quality of services. This is particularly important for the most vulnerable, such as students with disabilities.

As part of the development of a *National Career Development* Strategy, ACPET recommends that government also reviews the barriers that currently exist for students with a disability. For example, students who are currently working with an Australian Disability Enterprise (ADE) are unable to register with a Disability Employment Services (DES) provider and therefore cannot receive career guidance to support transitioning to open employment. As such, this Strategy must transcend education policies to incorporate government’s active employment agenda.

The Australian Government also has a role to play in ensuring all Australians have equitable access to up to date information about jobs and the associated training market. Accordingly, ACPET supports the redevelopment of the *myfuture.edu.au* website to a more citizen-centric approach however urges the Government to consolidate the vast range of government websites that are currently available into *myfuture.edu.au* website, or at the very least, convert this website as a portal.

The paper does not acknowledge the effort of Registered Training Organisations (RTOs), both public and private, in this space and of concern, fails to connect the mandated career development activities undertaken by RTOs as part of their contractual requirements against the Federal *Standards for NVR Registered Training Organisations (RTOs)* 2011. Specifically, *Standard 5.1 (for newly registering RTOs)*, which specifies that an RTO must have a strategy in place detailing how it will establish and meet the needs of clients and *Standard 16.1 (for existing RTOs)*, whereby the RTO must establish the needs of its clients, and deliver services to meet these needs.

Currently, publicly funded career development activities lie predominantly within schools, Jobs Services Australia (JSA) and DES agencies and public training institutions. It is not equitable that students electing to study with a private VET and/or higher education institution, do not have access to funded career services. To ensure that all Australians have equitable access, ACPET recommends that the Australian Government reconsiders its funding model to include provision for publicly funded career services to students of private training providers.

In late 2011, ACPET conducted a focus group of school based career practitioners, and was alarmed that overall, despite being aware of the full tertiary education sector, the practitioners did not understand the benefits of the private training system in offering real choice to their students. The Government therefore also has a role to educate career practitioners on COAG’s VET reform agenda and the implications for system users.
COAG is committed to lifting Year 12 or equivalent attainment to 90% by 2020 and at least halving the gap in attainment for Indigenous Australians. Through delegating responsibilities for youth, careers and transition programs to the States and Territories as part of the National Partnership Agreement, and despite spending significant funds on school business partnership brokerage programs and the Connections Program, outcomes are variable. ACPET believes that the Australian Government needs to reconsider its role and provide increased leadership and support for the States and Territories to deliver real outcomes. It should also reconsider the recipients of funding by acknowledging that youth complete their Year 12 or equivalent studies at a broader range of training institutions than schools alone. It is well known that private VET training providers in particular, do not receive funding to support youth in transition, despite providing an alternate learning environment for youth who cannot engage in a school community.

The Green Paper also fails to recognize the needs of international students, with international education placed as Australia’s third largest export industry. International students deserve access to quality career development. Whilst it is recognised that international education is a fee-for-service activity, through the mandating of professional standards, this cohort may also be assured of quality service provision.

In addition, ACPET fully supports Autism Queensland’s recommendation that the Australian Government has an important role to play in improving the dissemination of information to possible employers of people with disabilities on the supported wage system and the value of employing people with disabilities. ACPET recommends that this strategy is replicated for all disadvantaged groups.

**Question 3: Do you have any comments on the ongoing and future role for the state and territory governments?**

ACPET believes that the development of a national framework for career development will support the State and Territory Governments to better understand their role and provide greater unison of effort. There should therefore be representation from States and Territories on the proposed national leadership body (refer to Question 4).

The importance of career development as a contributor to Australia’s economic and social prosperity, begs a bipartisan approach.

**Question 4: Do you have any comments on the formation or proposed direction for a national leadership body?**

ACPET welcomes the formation of a national leadership body (p. 10). ACPET considers that membership of this body must include key stakeholders alongside State/Territory government representation.

ACPET envisages that this body could be responsible for:

- the development and reinforcement of national standards for career practitioners
- undertaking research, especially to identify and promote best practice
- monitoring trends and outcomes
- the provision of independent advice and recommend strategies and projects to address market failures, and

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1 Autism QLD is an active ACPET member
identifying work force capability development initiatives, in order to continuously raise the professional standard of practitioners.

Question 5: Do you have any other comments?

ACPET fully supports Autism Queensland’s recommendation that the Australian school curriculum includes processes to facilitate transition from school to working life, and that transition programs are included in all schools across the public and private school sectors, supported by both public and private training providers.