ACPET Submission

NSSC Consultation

Standards for VET Accredited Courses

April 2013
Introduction

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 over 1,000 members nationally, delivering a full range of vocational education and training (VET), higher education 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.

ACPET contact

Mr Ben Vivekanandan
National Manager, Policy and Research
ACPET National Office
Suite 101, Level 1, 126 Wellington Parade
East Melbourne VIC 3002
Ph: 03 9412 5912
Introductory comments

ACPET supports structural adjustments to the Standards underpinning VET training products that support RTOs to deliver high quality outcomes that meet the needs of individuals and industry.

ACPET’s broad view is that the accredited VET training products are sound and have the necessary flexibility for RTOs to contextualise them to industry and learners’ needs. However ACPET does note that many VET products have become over complex, burdened with ‘add-ons’ and content duplication and therefore can be difficult to use according to their intended purpose.

The focus on Accredited Courses is a result of the growing need for flexible, specific and tailored skills training. If Accredited Courses standards are intended to be brought into line with Standards for Training Package, the declaration in the Consultation Paper that Accredited Courses simply need to be ‘updated’ could be seen as a lack of acknowledgement of changes to the VET environment which has driven their growth and seen demand for training in addition to what Training Packages offer.

ACPET considers that the Standards underpinning VET training products need to allow for qualifications to clearly delineate training and assessment requirements where necessary, such as in at-risk qualifications or areas of training, so that RTOs have a clear basis for delivering quality outcomes. ACPET therefore welcomes revisions to the Standards that address this need.

In considering the Standards for Accredited Courses, ACPET’s response is based on three broad questions:

- What effect will revising the Standards for VET training products have in supporting today’s VET sector to meet industry skills needs?
- Under the revised Standards, will VET training products be revised and developed that are appropriate to today’s diverse VET sector?
- What effect will the revision of the Standards for VET training products have on revising the Standards will improve the delivery of quality outcomes?

The work involved to date in streamlining the Training Packages under the revised Standards for Training Packages indicates the challenge of the task ahead for revising Accredited Courses. ACPET is also concerned that the challenges of achieving effective industry engagement indicates an equal or greater likelihood of inconsistency in implementing changes to Accredited Courses in line with mooted revisions to the Standards.

While VET Products for the 21st Century Report is the key underpinning reference for changes to the Standards, ACPET believes that an overly prescriptive focus on the recommendations of the report may not make sufficient allowance for what is needed to ensure quality outcomes from the VET sector in the interests of industry workforce needs.

ACPET also queries whether there is a risk that harmonising Training Package Standards with Accredited Course Standards may result in a homogenising of Accredited Courses that counters their function of covering specific skills areas that cannot be met by Training Packages.
Responses to questions

ACPET response to Question 1

Is the design of the draft Standards for VET Accredited Courses consistent with the recommendations of the COAG VET Products for the 21st Century Report and the Standards for Training Packages? If not, how could the design be improved?

The language and layout in the Standards for Accredited Courses go some way to achieve consistency with the Standards for Training Packages. ACPET considers that inconsistencies do remain, however, which would impact on ‘flexibility and consistency within and across Training Packages and Accredited Courses’, as prioritised by VET Products of the 21st Century.

ACPET supports the strengthening of Standards wording to ensure that duplication is minimised. At the same time, ACPET considers that actual reduction of duplication is a separate effort which may not be fully achievable, given the volume of training products.

ACPET has also identified the following in the draft Standards for Accredited Courses and seeks clarification from the NSSC about how they propose to address them:

- **VET Products of the 21st Century** identifies ‘(t)he need to revise the current definition of “competency” to embody the ability to transfer and apply skills and knowledge to new situations and environments’. The Draft Standards make no such reference. How is this to be addressed, particularly where there are qualification outcomes and other Accredited Course content that is not drawn from Training Packages?

- ‘Outcomes’ are described briefly and broadly in Standard 1. ACPET queries whether this is adequate and whether it needs to be set out more explicitly in the introduction to the Standards and/or in the Standards themselves.

- Differences in the language, subject matter and templates of the Standards for Accredited Courses and Training Packages may reduce portability between the two products.

- Training Packages are mentioned only twice in the draft Standards:
  1) in reference to coverage of skills requirements where they are not covered by Training Packages, and
  2) and in reference to credit arrangements.

Given that Accredited Courses must comply with Training Package Standards 4-8 and given the intention for increased portability between the two product types, ACPET considers that the relationship between Training Packages and Accredited Courses should be set out more clearly.

- Foundation Skills are required to be set out in the Implementation field and also in unit of competency structure (as per Training Package Standard 5). Since the ISCs have not achieved unanimity in their approach to Foundation Skills and given lack of consistency in VET sector and industry engagement around foundation skills, ACPET queries how the Standards are to ensure consistency in the description of foundation skills in revised Accredited Course content.
• The NSSC has made it clear that credit arrangements will feature prominently in VET training products. However, none of the Standards describes credit arrangements. It is not clear to ACPET how this system is to be described in Accredited Courses apart from their description in the draft course information template, which points to an expansion of current approaches but nothing more systemic.

• Recommendation 6 of VET Products for the 21st Century stipulates the need for a review of Accredited Courses; in particular:
  – the development and approval of Accredited Courses
  – how Training Package content is duplicated and how duplication is dealt with, and
  – improving consistency across the ISCs and with the accrediting bodies.

The Consultation Paper does not identify how these issues are to be considered and dealt with during the revision and implementation of the draft standards for Accredited Courses. ACPET would like to know how these Recommendations are to be addressed in the review.

• Recommendation 8 of VET Products for the 21st Century aims at securing a stronger focus on preparatory and enabling qualifications by incorporating such qualifications into the national framework in a more explicit and systematic way. The Foundation Skills Training Package has now been endorsed, but it is not clear how this would be incorporated into the Accredited Courses Standards. ACPET wishes to know how this would be addressed in the review.

• Recommendation 9 stipulates that Certificates I and II need to be clearly identified as either preparatory or entry-level qualifications. The Consultation has not indicated how this is to be addressed in the review of Accredited Courses with qualification outcomes.

**Question 2**

Is the transition period of three years post endorsement of Ministers appropriate for all VET Accredited Courses to meet the draft Standards for VET Accredited Courses?

It is a positive move that the Standards for Accredited Courses are to be better aligned with Training Package Standards. However, it is hard to envisage how this process is expected to roll out in the indicated time for Accredited Courses, which do not sit within an industry network with dedicated Training Package professionals to manage the process.

ACPET queries how the logistics of consultation, revision and reaccreditation under the revised Standards are to be managed. It is not clear whether course developers would be required to re-establish the need for their course, re-investigate possible duplication with Training Package content and re-seek advice from the national regulator about accreditation requirements. There is the risk that course holders may find these requirements too burdensome of their time and resources and opt to let their courses lapse.

The volume of work required to adjust Accredited Courses to the Standards may also result in a backlog of administrative work from the regulatory bodies, especially since it seems unlikely that revised products can be ‘bundled’ in the same way as Training Packages and examined as one lot.
Question 3
What are the potential implementation implications of the draft Standards for VET Accredited Courses for your organisation?

Keeping up with endless ‘continuous improvement’ of VET training products is a heavy administrative and financial burden for RTOs, which are already bracing for the progressive rollout of the streamlined Training Packages and the implications of changes to coding on their own processes.

Another element is to be added to this with adjustment of Accredited Courses. ACPET queries how this is to be achieved without putting serious strain on the VET sector and whether the effort and investment involved in this work will sustain and improve quality outcomes.

ACPET anticipates considerable challenges with communicating to VET stakeholders and conveying the potential impact of changes to the Standards for Accredited Courses because their ‘niche’ characteristics and dispersal across course developers make it difficult for there to be a convergence of stakeholder engagement around them, unlike Training Packages with ISCs and other organisations which act as hubs of dialogue and engagement.

Since the holding of a course depends on an RTO’s gaining the permission of the course copyright holders, this could seriously impact RTOs delivering that course which if the course holder decided not to renew their course registration and it ceased to exist. This could also impact the specialist nature of many accredited courses, with a re-homogenising of VET Training products.

Concluding comments

Given the existing and intended interconnectivity between the Standards for Training Packages and Training Package, ACPET would like to know how the NSSC envisages the interrelationship between Standards and VET Training Products is expected to develop and be maintained.

ACPET wishes to know how or whether the NSSC envisages the Standards for Accredited Courses will make provision for Accredited Courses to specify teaching and assessment requirements, especially in courses with qualification outcomes and where there is potentially a high risk component either in the training area or associated with the qualification itself. ACPET believes that the current dialogue around how Training Packages may need to specify trainer and assessor competence as it refers to Training Package competencies and industry skills areas with Training Package coverage, needs to include accredited courses.

ACPET has concerns about how the autonomy of Accredited Courses and their lack of industry oversight will impact on the revision of the Standards and of these training products overall. The Consultation Paper does not mention how the opaqueness of Accredited Courses is to be addressed and ACPET believes this is a major concern for the proposed undertaking.

ACPET also questions the feasibility of the Standards’ becoming a mechanism to drive systemic implementation of credit arrangements. With lack of understanding and in some instances confidence in the VET sector and a seeming bias towards large institutions, credit arrangements remain firmly as agreements between individual institutions rather than systemic across the tertiary sector. This is likely to remain so for the foreseeable future. ACPET supports the structuring of credit arrangements under the revised Standards but is not confident that this will make much practical difference in driving national systemic change.