AQF Council
Development of an Australian VET Graduation Statement
Consultation paper

Australian Council for Private Education and Training (ACPET)

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1. Introduction

The Australian Council for Private Education and Training (ACPET) is the peak body for private education and training providers in Australia. Australia’s private education and training sector offers quality, diversity and choice to students from Australia and around the world.

ACPET’s core purpose is to enhance and promote the role of private tertiary education in order to achieve educational outcomes of the highest quality for individuals, their employers and communities.

Background

Privately-owned Registered Training Organisations are key players within the Australian Vocational Education and Training system, and, as the sector’s peak body, ACPET has a leadership role in facilitating input on proposed changes to RTO requirements.

ACPET is pleased to have the opportunity to respond to the questions in the AQF Council’s (the council) discussion paper regarding the proposed Australian VET Graduation Statement. We note that a number of ACPET members have participated in AQF Council focus groups nationally and may have provided additional suggestions and feedback on the ideas canvassed in the discussion paper.

Question 1: How well do you think a VET Graduation Statement, with a design as outlined in Section 4, would meet the aims outlined in Section 3? Are there any modifications which could be made to better achieve those aims?

and

Question 3: Are there any other options or implementation issues that you would like considered?

ACPET member RTOs will have expressed a range of views on the proposed Australian VET Graduation Statement (VETGS) in line with their diverse delivery models, qualification levels, student cohorts and client profiles.

While supportive of the concept of the VETGS, ACPET’s view is that the discussion paper raises a number of other questions in relation to those included in the paper itself. The aims of the proposed statement are broad and modelled on those of the Australian Higher Education Graduation Statement (AHEGS), with three key benefits identified, including use of the graduate statement as:

- a pathway ‘passport’ for graduates to employment or other learning institutions
- a conduit to domestic and international graduate mobility (for work and/or further study) through providing a range details about the qualification and any regulatory requirements met by the graduate, and as
- a way of meeting Australia’s international obligations (with regard to information to graduates and the portability of AQF qualifications).

The proposed VETGS mirrors the design of the AHEGS, which the council reports is used by all universities and some 40 private Higher Education providers. Anecdotal feedback from ACPET members suggests that international students find the AHEGS a useful document. ACPET supports plans by the AQF Council to conduct a validation survey/review to seek the views of a range of stakeholders on the usefulness of AHEGS and whether or not it is fulfilling its intended purpose.

With regard to the proposed VETGS, it is important to note that there is agreement among members that the issuing of a VETGS should be voluntary, and that, as proposed in the discussion paper, implementation be staged over a period (of years) following a pilot program. ACPET will support workshops and other communication activities as part of the pilot – through contact with members and
ongoing reporting and promotion - and agrees that a central contact point for advice on implementation issues will be essential.

While the design elements outlined in Section 4 of the discussion paper align with the AHEGS elements and would appear to meet the aims outlined in Section 3, ACPET recommends that the council consider the impact of the following factors – including implementation issues - in finalising any VETGS design.

Draft VETGS template

The proposed elements are self-explanatory, although current mechanisms for approval of AHEGS templates (ie by institutions through the Department of Education) would not appear to be replicable given the large number of RTOs who would be eligible to issue a VETGS.

- ACPET sees value in the publication of templates for a VETGS as suggested in the discussion paper. This should, however, be in a format that will allow providers to extract data from their student management systems to produce a VETGS, as well as allow for the customisation of statements (ie deletion of optional sections) by RTOs.

1. The Graduate

- We expect that information about the graduate would align with the graduate’s name and unique student identifier (when applicable) on the qualification or testamur.

2. The Qualification

- Members have suggested that the proposed summary could be provided by Industry Skills Councils (which may be impractical given the number of qualifications on offer) or alternatively be a prescribed extract from the qualification descriptor within the relevant training package. The summary and qualification sections could be combined, or a link provided to current training package information on the national register (training.gov.au).

- It is not clear how including entry requirements for the qualification already awarded to the graduate would be useful, unless an employer or institution wanted to confirm that the graduate had met any entry requirements. Once again, this information is contained within training packages.

- While licensing and regulatory information may be useful for students seeking employment in specific areas, ACPET suggests that this information (as well as entry requirements) could be optional and included where it is relevant. Unless a Registered Training Organisation is able to provide details on licensing and regulatory arrangements in a wide range of jurisdictions (including, eg, how graduates could seek overseas recognition for licensing purposes) the VETGS has less value as a passport for international mobility.

- ACPET supports the notion of the VETGS providing clearer understanding and greater use of pathways between AQF qualifications for/by graduates and institutions. As per the examples in appendix D, members have suggested that a generic statement about pathways would be appropriate (as per the example of the mandated statement on pathways) with a link to current pathways information on the RTO’s website, which could include details on pathways within the institution and any articulation arrangements with other institutions (including overseas institutions where relevant).

- Links to national searchable databases may be useful for large institutions (including public providers) but could be counterproductive for smaller niche RTOs where links may be limited and local. ACPET suggests that including database links and details of provider to provider arrangements in pathways fields should be optional for RTOs. Including other links (eg to ISCs
and MySkills) should be optional if the links are already included in other parts of the VETGS – namely with regard to qualification and institution details.

- ACPET suggests that if the VETGS is to allow for/recognise global mobility of students, information about global pathways and possible articulation arrangements with local institutions in students’ countries of origin should also be included. The VETGS should allow for as much customisation to individual students’ needs and aspirations as possible in this regard.

3. Awarding Institution

- In addition to an overview/brief history of their organisation, ACPET sees merit in all RTOs including links to their details on MySkills and on the national register (training.gov.au) and CRICOS, as well as their provider registration details (ie legal name and RTO ID number).
- ACPET does not see that Government approval of information about an institution would be necessary. The VETGS would form part of an RTO’s suite of marketing documents and the requirements of respective regulatory standards would apply (ie ethical and accurate marketing consistent with an RTO’s scope of registration).

4. Graduate’s Academic Achievements

- ACPET suggests that the proposed title of the section could be revised to allow for the (optional) recording of a graduate’s personal rather than academic achievements (eg extracurricular involvement with an RTO’s student support unit or community organisations or in-house or external training awards). The notion of academic achievements and associated grading and the example of references to prizes is at odds with the VET model of competency-based assessment and description of outcomes (ie competent or not yet competent).
- Given the template example suggests that units of competency undertaken would be listed in this section, ACPET members have questioned whether this proposed element of the VETGS would complement, duplicate or replace the current record of results, Members have suggested that RTOs that choose to issue a VETGS would include the record of results in either this section or with the testamur as is the current requirement.
- Members have questioned the relevance of including references to work placements when there is such a diverse range of provider delivery models, from entirely workplace-based delivery to blends of distance and online learning modes (with students already employed in industry). Members believe that identifying the mode of delivery and/or assessment of a qualification is not relevant or meaningful for employers or other parties. The student’s achievement of a qualification - and therefore confirmation of their competence in demonstrating required skills and knowledge - is (or should be) the key performance measure. Additional information that is relevant to an employer (eg elective units or occupational stream) can be included in the qualification summary.

5. Description of the Australian Vocational Education and Training System

- ACPET agrees that information in this section should be standardised and available for downloading from the authorised source and included as part of any AQF template. ACPET’s view is that it should also be as brief as possible with links to the relevant Department website provided for additional details given the frequency of changes to regulatory frameworks, governance arrangements and terminology. The overview of the tertiary system in the current AHEGS statement is lengthy and its relevance for graduates, employers and other institutions questionable. This assertion could be tested as part of a review of the AHEGS with lessons for the VETGS.
Questions 3 and 4: (SMS capacity to produce a VETGS and RTO willingness to participate in a pilot)

- As regulatory standards require all RTOs to have a system with the capacity to produce a Unique Student Identifier and to collect AVETMISS-compliant data for all courses, ACPET’s advice and experience is that the majority of providers have systems with the capacity – or the capacity to be modified - to produce a VETGS. ACPET would anticipate that resources required (ie time and cost) by RTOs for any system modifications could be quantified as part of the pilot.

- ACPET suggests that the burden of system changes will be greater for smaller providers, with this assertion to be tested as part of the pilot.

- ACPET can assist the AQFC in inviting members to participate in a pilot and hosting workshops and/or focus groups as required.

Further comments

- ACPET suggests that the AQF Council consider members’ comments about whether secondary schools, enterprises and some specialist RTOs will be required (in time) to issue a VETGS and who the key beneficiary/audience for the statement will be. Questions about the relevance of the VETGS for some VET graduates underscore the need for a pilot, followed by voluntary issuance of the VETGS where providers and students see it as valuable.

- The AQF Council should also consider whether an RTO that chooses to issue a VETGS should do so for all of the qualifications on its scope of registration. ACPET’s view is that if RTOs ‘opt-in’ and choose to issue a VETGS, they should do so for all qualifications on their scope for all students. While the council has suggested that the VETGS only be issued for full qualifications (ACPET has not surveyed members on this question), the AQF Council should consider whether or not (and why or why not) the VETGS should be issued for all qualifications starting with a Certificate I.

- The council should also consider whether RTOs would be required to issue a separate VETGS for two or more qualifications if students enrol in a higher level qualification before completing a related lower-level qualification, and whether this is of any value for graduates, employers or other institutions.

ACPET would be pleased to provide more details on any of the comments provided in relation to the discussion paper.

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