

2014–15 Pre-Budget Submission

January 2014

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 approximately 1,000 members nationally delivering a full range of higher and vocational education and training (VET) and English language courses across all States and Territories, and internationally.

ACPET's mission is to enhance quality, choice and innovation in Australian education and training. It represents a range of independent providers, including commercial and not-for-profit entities, community groups, and industry and enterprise-based organisations. ACPET works with governments, other education and training providers, industries, and community organisations, to ensure vocational and higher education and training services are well targeted, accessible and well delivered.

As the peak body for private education and training providers, ACPET is committed to ensuring that its policies, products and services contribute to an inclusive tertiary education system.

ACPET welcomes the opportunity to respond to the Department of Treasury request for a submission on its ideas and identified priorities for the 2014-15 Budget. This submission largely mirrors advice that ACPET has provided to the National Commission of Audit.

In addition, considering the policy change and innovation occurring in the tertiary education sector it is critical that Treasury focus on how tertiary education policy impacts private businesses. Tertiary education policy is increasingly reliant on private providers to deliver the programs that achieve government's tertiary education objectives. However there is a growing concern that government is willing to call on private business to play a critical role in delivering programs, but then walk away from these partners, with little or no warning when there is a policy change. The government must pay closer attention to how policy changes and lack of certainty in operating conditions affect the businesses they rely on to deliver their policy.

The business models of private providers have been put under considerable pressure by changes to government policy. Recently this has been most evident in changes to traineeship incentives. As an outcome of change to policy, providers are downsizing their businesses and some face closure. In the short term this results in job losses, over the medium to long term it may result in the deterioration of the skills and experience base of the sector and affect the long term ability of the private sector to deliver government policy in an effective and efficient manner.

Accordingly Treasury must assess how changes to tertiary education (funding) policy will affect business, and stipulate transition policies are introduced where market distortions will or are hampering business trading conditions as a result of government policy changes.

Recommendations

Recommendation 1: Achieve greater efficiency in the allocation of public funds through market-driven reforms to the training system by providing a national training entitlement that provides equity in access for students of any registered tertiary education provider, without distinctions between public and private institutions, or between higher education and VET providers.

Recommendation 2: Commit to maintaining ongoing funding for the Australian Skills Quality Authority (ASQA). Improve efficiency and effectiveness of the functioning of the tertiary education sector by developing a coherent and consistent regulatory framework across the entire sector, reducing overlap and inconsistency in the regulatory system and the imposition of unnecessary regulatory burdens on providers.

Recommendation 3: Alleviate unnecessary administrative and cost burdens for VET providers through limiting the number and nature of changes imposed upon the sector.

Recommendation 4: Improve the efficiency of the apprenticeship and traineeship system by reducing overlap between the States and Commonwealth, and improving access to funding by employers, including those in regional and remote areas.

Recommendation 5: Streamline governance arrangements in the tertiary education sector by addressing unproductive and unnecessary duplication in the many advisory, policy and funding bodies.

Recommendation 6: Reduce the unnecessary complexity and over-regulation of the delivery of international education by Australian providers through establishing an over-arching national advisory council, addressing regulatory impediments and costs of compliance adversely affecting providers of international education, and eliminating arbitrary distinctions between types of providers in terms of access of students to streamlined visa processing.

Recommendation 7: Scrap the MyUniversity website. In 2010 the Government of the day announced the creation of the MyUniversity website at an initial cost of 1.5 million. Since this time considerable financial resources have been invested in the further development and ongoing maintenance of the MyUniversity website with no value to Australia's 130 non university higher education providers.

Efficient allocation of public funds through market-driven reforms

The Council of The Australian Governments (COAG) agreement to create a National Partnership on Skills Reform in April 2012 aims to deliver a vocational education and training (VET) system with improved quality and greater transparency for students, employers and governments, greater access to training opportunities and improved outcomes for disadvantaged students, and greater efficiency.

A key component of this reform package was to have been the introduction of a National Training Entitlement. However, this commitment to a national entitlement to training is now drifting, with States diverging from the principle of market-driven reform and inconsistencies in the principle of funding higher education and VET not being addressed. At present the only national entitlement is to participation in university courses through HECS. Despite the rhetoric, an interim analysis by ACPET shows that there is no equivalent national entitlement of access to VET (see **Appendix A**), resulting in a situation where there are no limits on funding access for degree qualifications (even in esoteric areas with no labour market linkages), but VET funding is being increasingly constrained and limited – with industry and labour market needs the primary rationale for these limits.

Student-centred funding provides genuine choice for students, which today is not available to them across the two arms of the tertiary sector (VET and higher education). As state and territory governments place increasing complexity around who is entitled to what level of funding at which institution for courses up to and including Certificate III, the costs of VET diplomas are increasing. While diploma level study costs can be offset by the use of a VET FEE-HELP loan, there remains a range of differences in the way HECS HELP and VET FEE HELP loans are administered and the level of public subsidy they attract. Equally most private higher education students are currently ineligible for any public support for the diplomas and degrees they study, simply by virtue of the institution they study with.

Research for ACPET by the ACER, shows that increasing HECS places to the private higher education and TAFE Sectors would increase participation and reduce costs¹. Students should be able to use federally-funded Student Learning Entitlements, including credits for special needs, and HECS-HELP access, with any registered tertiary education provider. Allocation of funding should reward educational quality and outcomes, without distinctions between public and private institutions, or between Higher Education and VET providers.

Commit to maintaining ongoing funding for the Australian Skills Quality Authority

Australia's tertiary education sector is overseen by a number of regulatory, policy and advisory bodies, at both the Federal and State level. This fragmentation contributes to an overall lack of coherence in national strategy, policy, regulation and standards in the tertiary education sector, and with it, inefficiency, inconsistency and duplication of services.

ACPET actively supports the need for a strong regulatory system, but urges the emphasis should be on promoting quality while managing risk. Regulation should apply equally across the sector with the

aim of providing students of all providers the opportunity to access a diverse and high quality education.

Streamlining regulatory and funding arrangements will create greater incentives for integrated tertiary provision by all training and higher education providers, allowing them to focus on meeting the needs of students and employers rather than simply responding to the restrictions and limitations of government policy.

ACPET supports the current changes to higher education regulation being pursued by the Tertiary Education Standards and Quality Agency (TEQSA), following the recent review by Professors Kwong Lee Dow and Valerie Braithwaiteⁱⁱ.

While this review was a positive initiative, ACPET believes the government needs to undertake a more comprehensive review of regulation across the entire tertiary education sector with a view to eliminating overlap and inconsistency in the regulatory system and the imposition of unnecessary regulatory burdens on providers that impedes the efficient functioning of the sector. This would necessarily encompass a review of the Australian Skills Quality Authority (ASQA), the National Skills Standards Council (NSSC), provisions under the Tuition Protection Scheme (TPS) and the ESOS Act, and the Student Visa Program administered by the Department of Immigration, to remove inconsistencies (eg in risk criteria) and to eliminate duplication.

As the Review of Higher Education Report found, currently there is a significant funding differential in the government support provided to the two Commonwealth regulatory agencies. At present TEQSA receives the equivalent of \$117,000 per provider, while ASQA receives a paltry \$9,500 per provider. This inequity is inexplicable – as is the decision that ASQA must shortly operate on a full cost recovery basis while TEQSA is intended to always be partially government subsidised. In making this contrast ACPET wishes to make clear that it does *not* support TEQSA also moving to a full cost recovery basis. There is both a public and a private good from the regulation of tertiary education providers. The government recognises the public and private good in its funding for business regulators such as ASIC and the ACCC. As such, ACPET urges that ASQA's activities be similarly recognised as delivering both a public and private good and the government commit to maintaining ongoing funding for ASQA.

Alleviate unnecessary administrative and cost burdens

ACPET urges the government to pay closer attention to the impact of frequent policy changes and lack of certainty in operating conditions on private businesses in the tertiary education sector. The business models of private providers have been put under considerable pressure by changes to government policy. Recently this has been most evident in changes to traineeship incentives. As an outcome of change to policy, providers are downsizing their businesses and some face closure. In the short term this results in job losses; over the medium to long term it may result in the deterioration of the skills and experience base of the sector and affect the long term ability of the private sector to deliver education and training efficiently and effectively.

The ongoing reform of Australia's training system should continue to focus on removing barriers to education, training and employment for those Australians most beset by them, not introducing new barriers that undermine access and equity for people to improve their own circumstances.

Disappointingly, recent changes to traineeship funding arrangements are mainly affecting hospitality, business and retail employers and their employees. Many employers have relied on modest funding from government to assist them in securing high quality training for their staff. In winding back these incentives, government has failed to recognise that these industries represent significant employment opportunities in regional Australia and for women returning to the workforce.

Lack of responsiveness in the continual updating of training packages is directly contributing to findings of non-compliance during the regulatory audit process. It also typically requires considerable efforts and imposes unnecessary costs on providers to apply to add the 'updated' qualifications to their scope of registration, to amend all of their course documentation and to transition students into the 'new' qualifications. Recent examples highlighted by ACPET and others in the sector indicate that in some industry areas Training Packages are changing at an alarming rate, for example the Business Services Training Package originally developed in 2007 is now on its 9th version. Four of the most recent version changes (all approved by the Standards settings body for the sector, the National Skills Standards Council) have been made in the last 19 months. This Training Package also had an 'ISC update' change in the same 19 month period –meaning the 3,800 providers delivering from this package have been faced with unending change. This is far from the only example and in fact, the Industry Skills Council for the energy sector, E-Oz Energy Skills Australia, made the following observation in its most recent environmental scan about the pace and nature of the policy driven changes bedeviling the sectorⁱⁱⁱ,

a packed policy environment, with numerous initiatives and reviews at various stages aimed at achieving both social and economic objectives. The danger of implementing so many initiatives simultaneously is that focuses and outcomes might become mixed.

Improving employer access to funding for apprenticeships and traineeships

ACPET supports simplification of Australia's apprenticeship system and increased transparency in funding to employers, to ensure the system is meeting the nation's skills needs efficiently and effectively.

Currently, funding arrangements for apprenticeships and traineeships vary between States and Territories, with some States funding training for trainees in specific industries and others providing no funding at all. The current system has also historically involved Commonwealth government-funded employer incentives for taking on an apprentice or trainee, which have been used by employers to fund training by an RTO and go a very small way towards defraying additional costs (eg in time off the job, supervisory arrangements and replacement workers).

Within the broader context of workforce development, incentives have also been available to employers who encourage existing workers to enroll in apprenticeships or traineeships.

It is difficult to get a coherent overall picture of what employer-based training is being funded by the two levels of government, but the recent trend has been for States to limit or withdraw funding for traineeship training, at the same time access to Commonwealth funding has become increasingly restrictive, particularly with the removal of all incentives for non- National Skills Needs List traineeships for existing workers.

In June 2012, there were 90,800 trade and non-trade commencements in Australia by apprentices and trainees. In June 2013, the commencement figure was 58,700, a 30 per cent decrease. The NCVER^{iv} noted that “the substantial growth in non-trade commencements leading up to the June quarter 2012 and the subsequent decline is predominantly due to changes to Commonwealth incentive payments for existing workers, namely the removal of the commencement incentive payment for those apprenticeships and traineeships not on the National Skills Needs List (NSNL).”

In addition to its funding to employers with apprentices and for some of those with trainees, the Federal government is projected to provide an additional \$700 million (over five years) to assist employers to upskill their workforce and assist with workforce development costs through the National Workforce Development Fund. The fact that 18 months after the NWDF was launched the Department of Industry’s website contains only case studies of the effectiveness of this program is of concern. Equally concerning is the lack of data on the Fund available from the Australian Workforce and Productivity Agency, which administers the Fund. There are references in its annual report to AWPA assessing 440 successful applications for funding which were anticipated to fund around 35,000 training places. An evaluation by the NCVER of the Fund’s outcomes has not been made public.

Against a backdrop of a dramatic decrease in apprenticeship and traineeship commencements and persistently low completion rates, and the lack of data on the outcomes achieved through the NWDF, ACPET believes reforms are necessary to the support provided to employers to train their workers, including:

- a specific commitment from COAG that Australia’s apprenticeship and traineeship system has a key role in developing the workforce of the future,
- provision of adequate and consistent government funding to support employers to train their workers, with priority areas for government funding to be:
 - small and medium enterprises
 - employers in regional areas (where the general population typically has lower skill levels than in metropolitan areas)
 - large employers only where there is a need to significantly restructure their businesses as a result of industry change, and
 - to assist with the implementation or take-up of an innovation.

- clarifying the roles and responsibilities of different agencies involved in providing funding to employers to upskill their existing workforce, and
- supporting the role of RTOs in ensuring a fair deal for apprentices and trainees and increasing completion rates.

ACPET supports a continuation of the current State/Federal delivery and funding partnership model for employer based training, including apprenticeships and traineeships, only if the system is simplified and made more flexible to ensure it meets the nation's diverse training needs.

Consistency of financial support is essential to an effective system: during the last two years the introduction, delay and removal of incentive payments designed to encourage the take-up of apprenticeships and traineeships by enterprises and individuals has been enormously disruptive for employers, individuals and the RTOs that work with them.

The way forward lies in a simplification of the current system of financial support. Who is eligible for what kind of financial support is unclear and complicated, and feedback from employers indicates that red tape and onerous regulation present barriers to them taking on apprentices or trainees, or seeking other financial assistance that may be available to them. The burden on business has increased as the system has become more fragmented, and there is a clear need to streamline the current system of incentives and support payments.

Another area of weakness in the traineeship system is in regional Australia. ACPET believes the current system does not adequately recognise and support the training needs of industry in regional and remote areas, and that funding should be targeted to employers in regional and remote areas to invest in training that would not otherwise occur.

Streamlining governance arrangements for the tertiary education sector

ACPET urges the government to remove the unnecessary overlap amongst the many advisory, policy, funding and regulatory bodies in the tertiary education sector. Substantial time and effort is spent by providers on meeting overlapping reporting and accountability requirements at both the Federal and State level.

For example the Standing Council on Tertiary Education, Skills and Employment is supported by two Principal Committees (one focussed on tertiary education, quality and pathways; the other on data and performance measurement), a Committee of Senior Officials, the National Skills Standards Council, the National VET Equity Advisory Council, and the Australian Qualifications Framework Council. SCOTese Ministers own the NCVET, which collects and reports VET data and undertakes research on behalf of Ministers. SCOTese receives regular reports from the Chair of the Higher Education Standards Panel, and SCOTese Ministers receive regular reports from the VET regulator ASQA. In total, and at any given meeting, it is conceivable that SCOTese Ministers could be given regulatory advice from:

- their officials (NSOC)
- the NSSC
- the Principal Committee on Tertiary Education, Quality and Pathways
- the Higher Education Standards Panel
- the AQFC (the AQF is part of the regulatory arrangements for tertiary education)
- the Principal Committee on Data and Measurement (data is increasingly being used to measure risk and outcomes as part of the sector's regulatory arrangements)
- the NCVET (for the same reasons the Principal Committee on Data and Measurement might give advice)
- Industry Skills Councils (Training Packages are a part of the regulatory arrangements for tertiary education), and
- ASQA.

Streamlining governance arrangements and making them more consistent and transparent will improve efficiency in the sector. It will also create greater incentives for integrated tertiary provision by all training and higher education providers, allowing them to focus on meeting the needs of students and employers rather than becoming mired in unnecessary red tape.

Promoting greater efficiency in the delivery of international education

Over the last thirty years Australian education institutions have attracted large numbers of international students to study in Australia and in the process a major export industry has been created. International education now generates approximately 127,000 full-time equivalent Australian jobs^v and was worth \$15 billion in 2012^{vi}.

The international education industry has faced turbulent times in recent years, which have seen a steady decline in Australia's international education sector as students have chosen other destinations offering lower visa fees, faster bureaucratic processes, more affordable living and, importantly, coordinated global marketing by foreign governments that better recognise the value of international students.

Despite several positive measures arising from the Knight Review and the subsequent Assessment Level Framework Review designed to strengthen Australia's international education sector, deep divisions remain between the treatment and regulation of different parts of the sector.

In an attempt to reduce the negative impact of international students selecting a narrow range of courses in the VET sector, the policy pendulum has swung too far to the higher education sector, and particularly the university sector, through initiatives such as post-study work rights and streamlined visa arrangements favouring the higher education sector. This is leading to the unintended consequence, once again, of a concentration of enrolments in one sector at the expense of other sectors.

Over-arching national advisory body

While ACPET considers that some parts of the tertiary education sector have too many advisory councils and committees, in the international education sector the reverse is true.

At present there are a number of key agencies (mostly at the Commonwealth level) whose work is fragmented and uncoordinated. This lack of coherence and consistency acts against Australia's interests and as such, ACPET urges the establishment of a high level Ministerial Coordinating Council on International Education, as recommended by the International Education Advisory Council^{vii}, to oversee the strategic direction and operating environment of the sector at the national level. This would address one of the main sources of unnecessary complexity and over-regulation in the international education industry. In addition to Ministerial representation, ACPET believes it is necessary for the Council to have representation from senior business leaders, States most prominent in the export of education, and experts from each of the education export sectors.

Improvements to the ESOS Framework

ACPET also urges improvements to the Education Services for Overseas Students Act 2000 (ESOS Act) and its associated legislative framework.

Originally created to provide a national quality assurance and consumer protection framework to support what was then a growing industry, the ESOS Act has, over time, become prescriptive and restrictive, imposing an excessive administrative burden and a complex fee regime on providers which also serves as a disincentive to new providers wishing to enter the market.

Successive reviews of the ESOS Act have added layer upon layer of regulation. In some cases this has duplicated existing regulatory processes; either State/ Territory based processes, as in the case of schools, or those of other quality assurance bodies such as the Tertiary Education Quality Standards Agency (TEQSA) or the Australian Skills Quality Authority (ASQA). The overall regulatory framework is now highly complex, where similar providers can be charged differential fees for international education participation depending on where their domestic accreditation lies.

Recent changes to the ESOS Act included the establishment of the Tuition Protection Service (TPS). The TPS was recommended by the Baird Review and was designed to streamline the financial requirements of the ESOS Act and provide government managed central student placement services in the case of provider default. While the TPS was set up to fulfil a valuable role for industry, providers struggle to meet the associated and excessively onerous reporting obligations. The limitations on collection of tuition fees and record keeping requirements for fees paid to providers are clear examples of where proportionate deregulation is the only answer. All sectors of industry agree that the administrative burden imposed on providers by these requirements is out of all proportion to the issue at hand, ie the calculation of fees owed to a student in the case of provider default.

A further issue for ACPET regarding the TPS relates to the prepaid tuition fees a provider can collect from the student before they commence the course and, after commencement, before the second study period.

The issue with limiting payments to one period of study is that students undertaking a course will often search for cheaper alternatives while in the first study period and move to the cheaper alternative for the second period of study. Not only does this diminish the quality of education to the student, due to disruption in course delivery, but makes it very difficult for the original provider to plan in financial and administrative terms and creates an unfair scenario due to the original provider doing all the initial ground work.

In addition, the potential foray by the TPS into the commercial insurance market to ensure the Commonwealth can manage the risk of potential calls on the Overseas Student Tuition Fund, places similar insurance arrangements held by other businesses, including ACPET, at risk. ACPET warned when the TPS arrangements were set-up that the initial government contribution of \$5 million to the OST Fund was insufficient.

The TPS was set-up in an era when the sector was governed by a fragmented approach to international education and fee protection for international students. At the time the TPS was established ACPET advised that a preferable, less costly arrangement, would be to follow the successful approach of the New Zealand and Singaporean governments and protect student pre-paid fees via a trust account/trust deed arrangement. These arrangements have been highly effective in protecting students and have proven significantly less onerous for providers.

ACPET members operating in Singapore and New Zealand (as well as Australia) are clear that these international arrangements are more effective (for students and providers) than the current Australian TPS arrangements. ACPET urges a review of the TPS and its replacement with an industry-led scheme based on successful models in key competitor countries.

The failure of previous, fragmented, industry managed approaches were a result of the requisite divisions in the previous arrangements (with each industry association running separate Tuition Assurance arrangements). The sector has matured sufficiently that it is ACPET's position that an industry-wide approach is now both feasible and preferable.

The Student Visa Program

Where the ESOS Act is primarily concerned with quality assurance and consumer protection, the main concern of the Student Visa Program is to maintain the integrity of Australia's visa processes and to manage migration risk. While this is understood by industry, ACPET believes there are steps that can be taken to make Australia more competitive internationally in attracting overseas students. The cost of Australian visas is of very real concern to the industry as Australian student visas are substantially more expensive than those of our competitors such as the UK, NZ and Canada. And it is

not only initial student visa costs which are high. From 1 July this year the cost of a subsequent temporary visa application was raised to \$700 without reasonable justification or consultation. This will increase the costs for all students who apply for another visa while they are here in Australia, including a visa for further studies.

At the same time, student visa policy is clearly differentiating between sectors with streamlined visa processing (SVP) being made available to a limited number of institutions offering restricted qualifications. Reasons for differentiation of SVP are twofold. Firstly, SVP is limited to specific sectors, ie higher education providers offering Bachelor degrees and above, with the inclusion of nominated pathway partners for ELICOS and other pathways giving significant market advantage to a small segment of such pathway providers Secondly, the initial data assessment undertaken by the Department of Immigration and Citizenship requires a minimum of 100 overseas students be enrolled, limiting the number of eligible institutions.

This differentiation within industry and further, within sectors, has the potential to create imposed and arbitrary market differences between providers. To date, the entire university sector has been eligible to participate, however with the addition of selected higher education providers, it is likely that SVP participation is going to become a bone of contention between those who are eligible and those who are not.

The joint peak bodies advocate that an industry-wide provider risk rating approach would be more appropriate to assess migration risk. A simplified and transparent risk-based approach for all providers would overcome the need for the multiple processes administrative burden required for differential arrangements, as is the case with SVP, for different sectors and providers, depending on size of international student cohort.

ACPET believes that a proportionate and transparent risk management approach is the best possible way to ensure that Australia's international education export services remain high quality, affordable and low risk from a compliance perspective.

Such an approach would impose the greater burden on high risk institutions, while freeing up low risk institutions to focus on education. ACPET believes that it is possible for both the ESOS Framework and the Student Visa Program to utilise risk management principles which are transparent and consistent, taking into account both education quality and migration risk. It should be possible, in consultation with industry, to determine common criteria for risk across frameworks, as well as sector specific components of risk that might apply only within an ESOS or a migration context.

The streamlining of processes for low risk providers both in terms of quality assurance and reporting and compliance will go a long way to meeting the stated goals of the Australian government to *"improve the overall efficiency and effectiveness with which government services and policy advice are delivered"* and to rebuild the international education industry for the future.

MyUniversity website

ACPET takes this opportunity to call for the scraping of the MyUniversity website (www.myuniversity.gov.au). The Government of the day announced the development of the MyUniversity website in 2010. At this time \$1.5 million was provided to develop the website. Since this time further considerable financial resources have been invested in the ongoing development and maintenance of the MyUniversity website with no value to Australia's 130 non university higher education providers.

The front page of the MyUniversity website states:

“MyUniversity provides students with a broad range of information about Australian universities and other higher education providers.”

ACPET contends that it is virtually impossible for students to find information on the ‘other higher education providers’ on the MyUniversity website. Accordingly, the MyUniversity website is in essence providing a commercial and marketing advantage to universities that are in competition with the 130 non university higher education providers.

The MyUniversity website does not have the capacity to provide complete, current and relevant information to prospective and potential students seeking information on higher education course options. Given it is unable to fulfil its purpose the Australian Government should cease providing ongoing funding for the website. Such funding could be better used for other tertiary education initiatives as outlined in this submission.

Conclusion

In May 2011 the OECD published a review of VET^{viii} across its member countries. While this submission by ACPET focuses on VET, higher education and international education, the conclusions we reach are remarkably similar to those reached by the OECD. The OECD's recommendations are reproduced below.

ACPET considers that if they had been implemented when the OECD provided them, there would be considerably less waste and duplication in the current arrangements, and the system would be delivering more for students, employers and the broader community at a reduced financial cost for the Australian Government.

1. Commonwealth, state and territory governments should seek to agree common principles for VET funding and provision and to achieve as much administrative consistency as possible, bearing in mind the appropriate interests of local democracy in a context of devolved government. Costs and benefits arising from local variations and from duplication of responsibilities should be quantified.
2. Students should be entitled to pursue VET qualifications without charge up to the level normally attained at the end of schooling, that is, up to Certificate II or III. Fees for higher-level VET qualifications should be levied on the same broad basis as for higher education and defrayed through HECS income-contingent loans.
3. Students entitled to funding should be able to choose VET providers. Open competition should be accompanied by support measures designed to ensure that a good range of provision is accessible to all, including disadvantaged groups, that better information is available to potential students on the quality of providers, and that different types of providers can compete on a fair basis.
4. Skills forecasts are often unreliable and should not be the foundation of central planning. In future, there should be more emphasis on a system driven by student demand balanced by employer willingness to offer workplace training.
5. A broader range of quality and outcome data at the provider level should be developed and made available. This will support student choice and provision driven by student demand. Data should become a systematic element of programme and policy decision making. Efforts should be made to fill the data gaps, including an extension of the Student Outcome Survey.
6. The commendable reforms that base apprenticeships on competencies now need to be translated into action, allowing flexibility in the length of apprenticeships and supporting that through a common procedure for their assessment. Costs and benefits of apprenticeships should be analysed, reforms should be evaluated and the results used for policy planning. Ways of integrating apprentices into the production process earlier during their training

should be explored.

7. Training packages should be replaced by simple and much briefer statements of skills standards. Consistency in standards throughout Australia should be achieved through a common assessment procedure to determine whether the necessary skills have been acquired.
 8. Initiatives in which trainers work part-time in VET providers and part-time in industry should be encouraged. Innovative strategies are necessary to sustain the numbers and skills of the teacher and trainer labour force in providers. Better data on VET teachers and trainers should be systematically collected, published and used for planning and evaluation purposes.
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Appendix A

ACPET's Interim Analysis of the Implementation of the National Training Entitlement

	Vic	SA	QLD	WA	NSW	ACT	NT	Tas
Program	Victorian Training Guarantee	Skills for All	Great Skills. Real Opportunities	Future Skills	Smart & Skilled	-	-	Skills for Work
Timing	2008	July 2012	July 2013 (trial)	Jan 2014	Jan 2015	2014 tba	2013, expanding July 2015	Jan 2014, expanding Jan 2016
Providers	VIC-based or history of VIC delivery	Open	Open	Open (tbc)	NSW-based or NSW presence, staff & history (tbc)	tba	Currently public providers only	
Criteria	Approved as per Statement of Expectations 3yr contracts for some RTOs	Approved as per Skills for All guidelines	Approved as Pre Qualified Supplier	Current providers + new RTOs via EOI.	Plans to approve as per NSW Quality Framework	tba	tba	Must meet Skills Tas quality definition
Eligibility	Cert II up to Diploma	Cert II & III multiple + Foundation skills	Cert III (currently 10 quals under trial) + Foundation skills	Cert II up to Diploma. Foundation skills & Access programs only at TAFE.	Cert II & III first qual'n Foundation Skills Reduced subsidy for > Cert IV	Cert III Foundation Skills and wrap-around support	Cert III	Cert III first qualification Foundation Skills
Student contribution	Optional (ie RTO not compelled to charge)	Optional	Mandatory but RTO determines fee	Mandatory & set by Govt	Mandatory & set by Govt in 1 st year.	tba	tba	tba

ⁱ Edwards & Radloff (ACER), 2013, Higher Education enrolment growth, change and the role of Private HEPs: Prepared for the Australian Council for Private Education and Training [http://acpet.edu.au/uploads/files/ACER%20Background%20Paper%20for%20ACPET%20-%20Growth%20in%20HE%20FINAL%20131115\(1\).pdf](http://acpet.edu.au/uploads/files/ACER%20Background%20Paper%20for%20ACPET%20-%20Growth%20in%20HE%20FINAL%20131115(1).pdf)

ⁱⁱ Lee Dow & Braithwaite, 2013, *Review of Higher Education Report* <http://www.innovation.gov.au/highereducation/Policy/HEAssuringQuality/Documents/FinalReviewReport.pdf>

ⁱⁱⁱ E-Oz Energy Skills Australia, 2013, *Environmental Scan 2013* http://www.ee-oz.com.au/images/Reports/Environmental_Scans/E-Oz%20Enviromental%20Scan%202013.pdf

^{iv} NCVER , 2013, *Apprentices and Trainees, Early trend estimates, 2013 June quarter* <http://hdl.voced.edu.au/10707/265740>

^v Deloitte Access Economics, 2012, *The economic contribution of international students* Prepared for the Australian Council for Private Education and Training [http://www.acpet.edu.au/uploads/files/Deloitte%20ACPET%20Economic%20contribution%20of%20international%20students%2005FEB2013%20\(Exec%20summary\).pdf](http://www.acpet.edu.au/uploads/files/Deloitte%20ACPET%20Economic%20contribution%20of%20international%20students%2005FEB2013%20(Exec%20summary).pdf)

^{vi} Australian Education International, 2013, *Export income to Australia from international education activity in 2012* Research Snapshot <https://aei.gov.au/research/Research-Snapshots/Documents/Export%20Income%202012.pdf>

^{vii} International Education Advisory Council, 2013, *Australia: Educating Globally* <https://aei.gov.au/IEAC2/theCouncilsReport/Documents/Australia%20%E2%80%93%20Educating%20Globally%20FINAL%20REPORT.pdf>

^{viii} OECD (Directorate for Education, Education and Training Policy Division), 2011, *OECD reviews of vocational education and training: Learning for Jobs – Pointers for Policy Development* <http://www.oecd.org/education/skills-beyond-school/47955326.pdf>