Luke Behncke  
Director  
Office of the National Skills Standards Council

By email: luke.behncke@natese.gov.au

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Dear Luke

Thank you for the invitation to provide feedback on the NSSC’s consultation paper Implementing Quality Measures in Industry Training Packages.

In considering ACPET’s feedback on the consultation paper, I would like to confirm that as a matter of principle, if there are legitimate reasons for industry to require greater specificity in Training Packages in relation to delivery and assessment measures, ACPET supports measures to facilitate such a change.

However we have real concerns about the process taken to develop this consultation paper; with the approach used by the consultants in developing the paper; and with the amount of public funding we understand has been spent on the work. In addition, we believe we have identified gaps and internal inconsistencies within the document’s proposals.

As a result we would urge the NSSC to step back from the timeframes we understand are being pursued, to get recommendations for change to the November 2013 meeting of the COAG Standing Council on Tertiary Education, Skills and Employment. Instead we recommend that the NSSC start afresh and undertake a thorough and detailed consultation process with the sector, which does not start from the perspective of the current consultation paper.

The NSSC should instead commission work to look at the level of specificity currently being included within Training Packages (despite national guidelines and processes there are wide variations in the content of Training Packages across different industries), as well as critically examining the level of inconsistency within individual Training Packages (ACPET members consistently identify the confusion created for them and the regulators when different parts of the one Training Package states ‘must’, ‘may’, and ‘should’ in relation to the same requirement for the same qualification in different parts of the one Training Package).

Once that detailed ground work is done and the amount of specificity currently contained in Training Packages is known, as well as the extent of inconsistency; then the sector, the NSSC and ISCs are in a position to discuss what additional quality measures are needed.

ACPET notes the advice of the Enterprise RTOs Association and considers it reflects the need for greater clarity and widespread consultation on what changes might be required and why. If enterprises which are also RTOs do not see a need for greater consistency, but some non-enterprise providers (represented by bodies like ACPET) believe that greater clarity is useful, it points to a tension in how industry representatives’ views are included in the Training Package development process and how improvements can be made to make Training Packages clearer, without the end result being highly bureaucratic processes which serve to make Training Packages more difficult to use rather than more straight forward.
Turning to the specific proposals in the paper:

ACPET is confused by aspects of each of the paper’s stated need (page 13) to:

- set clear standards for delivery and the quality of assessment (the delivery measures set out later in the paper do not contain mention of standards, likewise it is not apparent why there is a need to be clear about the ‘quality of assessment’ but apparently not the ‘quality of delivery’),
- strengthen the current outcomes based model of quality assurance by offering delivery measures that are necessary to ensure assessment outcomes can be met (the italics are ACPET’s, but surely it is the assessment measures in the paper which are primarily intended to strengthen the assessment outcomes), and
- make these quality improvements in a way that does not create barriers to flexibility and innovation or impose excessive costs and complexity (ACPET supports these good intentions but sees little in the remainder of the paper to suggest the authors seriously address this aim).

With confusion in two of the three stated reasons for the paper’s proposed measures and little detail on the final dot point – it is unsurprising that there are further inconsistencies elsewhere in the paper.

ACPET finds the description on page 14 of the delivery measure, ‘range of training conditions’, to be confused when it initially states “specifies different environments and conditions that may affect training” (a very broad definition) – and then subsequently states “range is restricted to essential operating conditions and any other variables essential to the learning environment” (a much narrower definition).

The paper also asserts that an assessment validation model is a “quality review process… checking that the assessment tool produced valid, reliable, sufficient, current and authentic evidence to enable reasonable judgements to be made as to whether the requirements of the relevant aspects of the Training Package to be met” (page 15). The paper reports on page 20 that, should the paper’s recommendations be implemented, ISCs expect to have relatively low levels of use and assign relatively low levels of importance to a provider’s assessment tools – but conversely assigns high importance and relatively high levels of use to more specificity of a provider’s assessment validation model. This tension is compounded on page 24. Essentially, as ACPET reads the report, the authors and ISCs are recommending little guidance on assessment tools but a high likelihood of greater specificity on validation models at the qualification level. Such a recommendation is clearly unworkable. ISCs cannot prescribe validation models for individual assessment tools if they have little to say about different tools. Furthermore it is impractical and unworkable for providers to be asked to introduce different assessment validation models for each qualification on their scope. The only sensible way to tackle assessment validation improvements is at the provider level (or in providers with a large scope – at the faculty or industry level). As such, this measure should be further specified in the Standards for RTOs, not in the Standards for Training Packages. The same logic applies to any proposed changes to introduce greater specificity in validation specifications.

Returning to the delivery measures, ACPET asserts that it is incorrect to claim on page 22 (Table 4.1), that the proposal to introduce specific trainer requirements is not similar to any existing measures in the current regulatory regime. In fact Standards 15.4 (b, c and d) of the Standards for National VET Regulation provide an existing framework that would need to be reviewed and might need amendment to accommodate greater specificity in the Standards for Training Packages in relation to specific trainer requirements.
Section 4.3 of the report (page 25) makes the claim that the current Review of the Standards for VET Regulation being undertaken by the NSSC is likely to see changes made to the Standards, particularly in relation to “measures related to training delivery”. To date the NSSC has not proposed more than a very small number of changes which relate to training delivery and ACPET seeks confirmation from the NSSC that additional work on training delivery measures is not underway or planned (outside of the proposed changes specified in the standards policy framework, Improving Vocational Education and Training: the Australian Vocational Qualification System).

When the authors state on page 25 of the paper that “the Standards for RTOs would contain both general quality provisions in the form of a delivery system, and a schedule of specifically designed measures such as those set out in Table 3.1” it is unclear if the proposed ‘schedule’ is seen as an addendum to the Standards for RTOs or as the ‘bookend’ referred to earlier and contained in changes to the Standards for Training Packages – which is mostly where Table 3.1 recommends the specific delivery measures be included.

ACPET strongly supports the recommendation at the top of page 26, that measures “could be less prescriptive and could be expressed more as benchmarks or could describe typical practice relevant to the qualification or (sic) unit...” ACPET acknowledges that the regulators have at times cautioned against descriptors of ‘typical practice’ because auditors and providers can congregate towards what is ‘typical’. ACPET contends that with ongoing professional development of the auditor pool it is entirely possible to recognise typical practice and make judgements about it, as well as to be presented with atypical practices and make similarly defensible judgements.

ACPET is concerned by the report findings on page 34 (Table 5.8) that ISCs see themselves as ideally placed to deliver externally designed and reviewed assessment systems. ACPET believes such a situation would lead to the potential for both conflicts of interest and a substantial narrowing of the flexibility and innovation of the training system; in essence a move back towards the former system of national curriculum, instead replaced with national assessment. ACPET has the same concerns about the ISCs’ perceptions of the role they should play in relation to centrally developed assessment tools.

ACPET looks forward to further discussions with the Council and the broader sector on proposals to improve delivery and assessment in VET.

Yours sincerely

Claire Field
Chief Executive Officer