Submission
Response to Skills Australia
Foundations for the Future Paper
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1. Introduction

The Australian Council for Private Education and Training (ACPET) is the peak, national industry association for independent providers of post-compulsory education and training. ACPET represents more than 1,100 organisations, from schools to higher education institutes, delivering a full range of education, training and English language courses to both domestic and international students.

ACPET welcomes the opportunity to present a response to the Skills Australia’s position paper Foundations for the Future: Draft Proposals for Future Governance, Architecture and Market Design for the National Training System. ACPET also submitted an earlier response to Skill Australia’s previous discussion paper on the Future Governance of the National Vocational Education and Training (VET) System.

ACPET supports the direction of the current government to boost productivity and workforce participation through a focus on education and training. It is important that Australia develops an internationally competitive education and training sector through significant reform and investment.

As part of this investment, ACPET is committed to building an education and training system in Australia which helps all individuals to establish rewarding, social and economic lives that contribute to a productive and socially inclusive nation. Investment in human capital through education and training will help Australia’s future prosperity and the well-being of its people.

2. Key Messages

In responding to the Skills Australia’s position paper, ACPET highlight the need to consider a number of items which impact on the draft proposals for future governance, architecture and market design for the National Training System (NTS) put forward by Skills Australia as the Foundations for the Future.

ACPET strongly advocates that the following actions need to be implemented immediately:

a. One tertiary system - alignment with recommendations from the Higher Education Review in terms of one tertiary sector;

b. Adjustments to qualifications and products in the VET sector - adjustments to the Australian Qualification Framework (AQF) and the Australian Quality Training Framework (AQTF) are needed to allow for qualifications and products to be developed using a broader framework to encourage innovation and flexibility particularly in the development of courses above Certificate IV;

c. Representative decision making and approval processes – the need to establish representative decision-making and approval processes by users (clients and providers) of the NTS and therefore a breakdown of the heavily-burdened bureaucratic and regulatory structures which
have been established and are currently limiting delivery and competitiveness of providers; and
d. The right to choose a quality provider – enabling the fundamental and inalienable right of individual learners and workers to be self-determining in a democratic market economy by being able to choose a quality provider.

a. The proposed move to a single tertiary system

ACPET supports the need for a single Australian system for the higher education and vocational sectors with an integrated continuum of functions, qualifications and providers, and streamlined administration. Australia needs a ‘fit-for-purpose’ qualification and quality system structured around user and supplier performance. There appears no reason against Australia steering all formal post-school education through one efficient, effective, modern system in place of multiple ‘sectors’, to deliver a matrix of qualifications responding to evolving stakeholder needs.

The nation needs:

- One Australian tertiary education system with a continuum of qualifications and removal of artificial sectoral barriers to tailoring and delivering innovative courses utilising both higher and vocational education strengths;
- One Australian tertiary system in which, aligned with national policy, productivity and competition objectives, institutions are not delineated on public or private/commercial business models – the key test should be the provider’s performance in producing quality outcomes for students;
- Student-demand based funding models because all types of students warrant choice to suit their needs and interests and equivalent public support for the range of institutions and courses they select; and
- A streamlined, best-practice regulation and administration system in a single tertiary education system including the removal of anti-competitive elements from regulations and processes and practical implementation of mutual recognition for multi-jurisdictional institutions.

In addition, Australia needs to come to grips with institutional (universities and TAFEs) cost structures including direct and indirect costs of embedded research nexus. Independent education institutions can offer useful models of innovation, efficiency and education results.

ACPET endorses an approach where clients (employers and individuals) can choose the most appropriate provider to meet their needs and where that provider can develop a quality learning program based on delivering the best possible outcomes for the clients. All barriers, such as funding policy, prescriptive training products and excessive and uncoordinated regulation, need to be removed.
b. **Adjustments to qualifications and products in the VET sector**

ACPET support the need to develop a policy framework to enable VET qualifications and products, including Training Packages to respond to changing labour market demand for knowledge and skills needed by industry, employers and individuals.

Skills Australia states that ‘the National Training System (NTS) functions in order to meet the needs of clients’ however the focus of their position paper lies with the needs of industry and employers with limited attention paid to individuals and their needs.

Initially, industry and employers’ needs did drive the structure of the NTS with training models like apprenticeships setting down a model for how national qualifications should be attained in the Vocational Education Training (VET) sector. VET sector qualifications and products have been enshrined in old, inefficient and often outdated industrial training perceptions, functions and practices that are of increasingly limited relevance in an advanced knowledge economy.

Today, the VET sector has expanded to include a wider range of industries and qualifications including different purposes and reasons for why individuals enrol in a VET course i.e.: as entry to a higher level qualification program of study. The NTS was initially established to align qualifications with employment outcomes. The complexity of job and career pathways across the range of industries and the needs of individual clients, dictate that the VET sector should take account of all needs – employers and individuals.

The Skills Australia paper also highlights that users of the NTS are more sophisticated, their needs are complex and as consumers they want tailored, easily accessible and creative, responsive, and flexible service. This statement is particularly applicable to the individual learner as well as the needs of industry.

It is particularly important that the AQF and AQTF explicitly expand vocational recognition of and responsiveness to the urgent occupational need for higher order skill development. This is needed to better facilitate advanced level technical training above Certificate IV level, in addition to the supervisory and management priorities currently privileged in Training Package qualifications at this level. Such technical training may be discipline specific, but may also be cross-disciplinary where technologies are rapidly converging. Advanced technical qualifications at this level warrant a degree of customised specificity, best developed as innovative accredited courses designed for specific purposes. It is this approach which will help to negotiate change and resolve current and emerging issues with respect to sustainability across all sectors of the Australian economy.

Today, recognition of increased cognitive thought processes is needed for qualifications which are suitable for the Para-professional within the industry or the student utilising the VET qualification pathway as a transition to a higher education qualification. Also, the advanced development of employability skills needed for Para-professional and managerial levels of work and therefore more
applied use of cognitive thinking on top of acquired knowledge and skill levels supports this case. A smoother transition between VET and higher education qualifications can result if there is recognition of cognitive thinking at all levels of qualifications, no matter what system of assessment is used.

However, the current requirements around Training Package qualification packaging and alignment, particularly above AQF Certificate IV level are acting as a barrier to the needs of learners, particularly if not yet set on distinct occupational goals, and the need of industries undergoing massive change.

Currently, there are too many under-utilised and patently unsupported VET qualifications - 80% of publicly funded VET enrolments are in only 180 out of 1,592 Training Package qualifications with 70 qualifications not used at all in 2006¹. This alone is a very serious indictment of the lack of relevance and efficacy of the Training Package strategy to date, despite its mandatory nature, and does not auger well for the future.

ACPET support the use of broader statements of learning outcomes, based on different levels and combinations of skill development and cognitive thinking, underpinned by the employability (soft, core, generic, etc) skills and personal attributes.

Independent providers, with their ability to quickly adapt, to be time responsive to the needs of clients (individuals and employers) and flexible in their approach to delivery, would welcome a change to VET specific qualifications and products to allow for:

- Qualifications at AQF Level IV and above be re-designed to provide greater flexibility to cater for individual client needs;
- Accumulation of credits towards higher education qualifications; and
- A system of crediting all types of learning towards the achievement of a qualification level.

ACPET recommends a partial deregulation of the VET system, with revisions made to the AQTF, to permit accreditation on merit of differentiated VET courses especially above Certificate IV level i.e.: AQF Diploma, Advanced Diploma levels and above. Training Package qualifications at Certificate I-IV levels that have and continue to prove useful, particularly where pertinent to trades training with licensing implications, should be retained and maintained.

This suggestion for partial deregulation would progressively free up the sector, allowing the educational pendulum to swing back to a more productive and more competitive, middle ground with incentive for providers to innovate and invest in growing VET scope and scale of operations.

c. Representative decision making and approval processes

ACPET endorses the need to reform the governance of the VET sector so that providers can operate effectively without being restricted by unnecessarily complex regulation. ACPET supports a

¹ NCVER Literature Review pp 11-12
governance model that allows for streamlined and transparent decision-making processes and where users and suppliers (public and private) of education and training have a strong representation at the highest levels.

ACPET supports a National Training System (NTS) driven by industry needs however, we urge that providers of education and training must also have an effective voice in Government policy making and the delivery of education and training. This should occur by representation at all levels including Skills Australia and Industry Skills Councils.

ACPET would like to make a significant contribution to the work of Skills Australia. The private education and training sector has an essential role to play in meeting the Government’s targets and should be involved at all stages from policy development through to delivery of the program and outcome evaluation.

ACPET seeks a further appointment to the Board of Skills Australia representing the private education and training sector. To produce quality education and training outcomes, there needs to be a partnership arrangement between employers and providers. Not allowing education and training providers to be represented at governance level, especially considering their level of input into the process of training, promotes a ‘master/servant’ relationship between industry and training which is not conducive to a strong working relationship. Without an equitable relationship and respecting and valuing the contribution of each party, the quality delivery needed to prepare the nation’s workforce will not be achievable.

If the Government is to achieve its education and training objectives, it is essential that private providers have input to Skills Australia. The private education and training sector delivers the greatest number of post compulsory education courses in Australia across all regions. It is the provider of choice to over 2 million Australians and 70% of international students. It also provides over 15,000 jobs in teaching and administrative positions. Its voice needs to be heard.

It is important that in streamlining regulation and decision-making processes, that the Federal Government recognizes the different input of the stakeholder groups and ensures that there is equality of representation. At this stage, the system of one vote per representative on committees and working parties, where the number of government department or industry representatives outweighs the stakeholder representatives, is not representative of input.

For the education and training industry to become more dynamic and responsive, communication and participation within the Industry Skills Councils’ (ISCs) framework by all stakeholder groups needs to be more effective. To this end, it is vital that private providers also have a direct role in the governance of ISC’s as members of relevant Boards. Providers regular contact with employers and individual workers and learners, ensures that they would have significant input and add value to the process of decision-making.
d. **The right to choose a quality provider**

ACPET fully support a system of funding following the client rather than funding institutions. As part of this approach it is important to expand the income contingent loan system for all education and training. With improved information and support on how to access and use this information, the client can make an informed choice and with funding available can choose the most suitable education and training provider.

At the same time, the NTS must also be driven by the needs of industry, otherwise employers will move away from the NTS to non-accredited programs particularly if the systems in place for accredited education and training do not provide for the preparation, up-skilling and re-training of the employees needed by industry for today’s labour force needs and to compete internationally in future markets.

However, ACPET reinforces the need for a national training system driven by client-demand where individuals can choose their provider and are also financially supported to gain a Certificate IV level or equivalent qualification. Individuals should then be able to access income-contingent loans to access higher level qualifications as is the case for higher education.

ACPET supports a strong integrated national training system (NTS) which allows for local diversity and flexibility but sees that the current, non-competitive practices in relation to purchase of training, restricts the delivery of flexible, time responsive training. Clients should be able to make an informed decision and access education and training, from which ever provider (public or private) is chosen as the most suitable to meet their needs.

Learner-centred funding and income-contingent loans for education and training above AQF Certificate IV level would develop a demand driven system of education and training (based on client needs) rather than the current supply driven system where Governments, use ‘not in time data’ to make decisions to purchase education and training for clients and direct provision of funds to institutions.

ACPET supports contestable funding for all education and training as the only fully effective means to ensure total flexibility in post compulsory education and training offered in Australia. Contestable funding ensures the most efficient delivery of high quality, relevant and targeted courses to meet the needs of industry, enterprises and learners by opening up the education and training system to greater marketplace competition through a properly regulated tender process.

An important feature of the right to choose is also the need for a guarantee of quality. The client, in making a choice, must be able to trust that the regulation and accreditation bodies have set a quality benchmark standard and can ensure that all providers operating in the system, have either reached or surpassed that benchmark. At the same time, these bodies must ensure that the systems and processes that are put in place, do not hinder innovative and quality delivery of programs for clients.
The current level of regulatory burden placed on providers must be streamlined and then enforced sufficiently to guarantee that the client, when choosing a provider, is assured of quality outcomes.

There is an evident need to strengthen the quality audit process, to come to grips with aspects of standards, quality, performance and student learning.

3. **Response to the Recommendations**

a. **Setting a unified national vision**

ACPET support the establishment of a single Ministerial Council for Tertiary Education for training, higher education and employment participation BUT stresses that the new arrangements for industry advice as a central feature of the governance framework includes representatives from all stakeholder groups within the education and training industry. This would mean that the establishment of a Peak Industry Advisory Group would include representatives from both the public and private sector of the education and training industry. ACPET would therefore support a national network of industry advice coordinated through Skills Australia provided there is a balanced representation from the education and training industry.

Overall, ACPET endorses the recommendation to establish national statutory arrangements for VET regulation and in time, alignment and integration with those for higher education. ACPET understands that there are sensitive policy issues around sector delineation but considers the new system should be developed with a view to a continuum of AQF qualifications and other features without sector divisions.

In this respect ACPET draws upon the collective experience of public and private dual sector educational providers, to note that the most significant legislative and bureaucratic impediments to immediate implementation of an operationally integrated tertiary education sector in Australia involves the question of institutional VET vs. Higher Education registration, which in turn imposes commensurate sectoral constraints on tertiary course content and delivery methodologies.

Compliance with either VET or Higher Education or both quality assurance regimes currently entrenches a costly duplication of effort to secure mutually exclusive approvals in each sector. These approvals overtly restrict RTOs to delivery of VET qualifications under AQTF Scope of Registration requirements and/or self accrediting or non-self accrediting Higher Education institutions to deliver Higher Education qualifications under very different governance, pedagogic and academic criteria specifically relating to the National Protocols governing registration as a Higher Education Provider and the accreditation of higher education curricula.

In terms of endorsing NARA as the national regulatory body, ACPET questions whether sufficient investment will be made in this body to capture and implement the diversity and fresh good practice approaches used by some of the current State and Territory RCABs. The support for one body must
guarantee that current inconsistencies in interpretation and application of the AQTF will be addressed. NARA must also address the need to streamline regulation so that the number and type of audits faced by providers are rolled into one process, including the State and Territory purchasing audits. Other questions that need to be answered if NARA is to be supported in this role:

- Will NARA be sufficiently funded to set and enforce a quality benchmark standard to guarantee clients of their choice of provider, as current RCABs are not sufficiently resourced to enforce the required standards set down in the AQTF?
- Should the same body which regulates practice also be responsible for identifying quality practice as well as managing the development of the quality products i.e.: Training Packages, used to underpin development of this practice?

ACPET reinforces the need for representation on an independent board established for the purpose of national regulation. As the peak, national industry voice for private education and training, ACPET would expect to be represented on this body.

b. Providing the evidence base for policy and reform

Based on the need to change the methodology and conditions around how evidence is gathered to determine how education and training is purchased, ACPET would see the need to change how labour force trends are measured. Although the current process of collecting industry intelligence through environmental scans by Industry Skills Councils in collaboration with stakeholder groups is an improvement, ACPET does not see that this information will be time responsive enough to meet Australia’s current and future workforce demands.

ACPET supports the need for an effective nation-wide network of skills planning and industry advisory arrangements provided there is recognition of the contribution made by the education and training industry, including representation on all network groups i.e.: Boards of National Industry Skills Councils. This representation is not only an acknowledgement of education and training as an industry in its own right but also an acknowledgement of the valuable industry intelligence that providers of education and training services can provide as a result of regular engagement with employers.

A strong example of the value of providers ability to contribute to industry intelligence and therefore in assisting with the evidence base for policy and reform is shown in a recent article by Dr John Mitchell in the Campus Review and repeated in ACPET’s weekly e-newsletter. This article questions CEOs of education and training providers to provide answers to the question of ‘whether it is possible for training providers to craft effective strategies amidst the current economic turbulence’.

Mr. Terry Richards, CEO of the Australian College of Training, a private provider and the winner of the 2008 national award for excellence for small training providers, responded that as a flourishing enterprise, he has not given up on long-term planning, but has a flexible approach to it.
“We have a long-term plan, for example a three-year strategic marketing plan, but we probably revise it every three or four months. But in terms of what we’re doing, we can revise that three or four times within a month sometimes, depending on what’s happening and also where things are working and where things are not.” ……. In the vocational training sector everything we do generally has a direct relationship to a decision that one of our clients has to make. We’ve got to wait and see which way our client wants to go, so when they do make a decision, it automatically creates a huge flurry of re-positioning for us to accommodate that client. ……. We re-invent our business model with every new client. Not only that, every time we see a shift in our clients’ business we immediately re-negotiate and re-invent the business model for that client. I think if you were to describe our organisation in one word it would be fluid, because we continually have to be flexible.”

c. Investing wisely and effectively in skills and workforce development

ACPET supports a strong integrated national training system (NTS) which allows for local diversity and flexibility but sees that the current, non-competitive practices in relation to purchase of education and training, restricts the delivery of flexible, time responsive training. Clients should be able to make an informed decision and access education and training from which ever provider (public or private) is chosen as the most suitable to meet their needs.

ACPET support a demand driven funding approach and recommend that all training up to Certificate IV is fully funded with an income contingent loan system available to individuals for higher qualifications.

ACPET advocate for a system of funding which follows the client rather than funding institutions. As part of this approach it is important to expand the income contingent loan system for all education and training. With improved information and required support to access the information, the client can make an informed choice. The client (employer or individual) can choose the most suitable education and training provider based on the financial support available.

ACPET support the Boston consulting Group (BCG) recommendation from 2007 that there should be a ‘truly competitive national VET market’. Full contestability for the public training dollar including User Choice funds will help to improve the quality of delivery. Due to different state/territory policies in regards to User Choice, there is very limited access to this funding by private institutes particularly in states such as New South Wales.

The OECD report review of vocational education and training (VET) in Australia Learning for Jobs (November 2008), the OECD policy study of VET – a program of analytical work and individual country reviews designed to help countries make their VET systems more responsive to labour market needs - also recommended the need for a competitive national VET market and use of student-centred funding:

- 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; and
• 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.

ACPET supports an education and training system where there is no advantage given to providers by virtue of their public sector ownership. ACPET supports full contestability and as a member organisation for independent providers could play a role in determining quality provision standards particularly regarding financial viability.

ACPET supports, that the dual role of purchaser and provider of training by some states/territories, is definitively separated and that the provider of public training funds, bases decisions on outcomes produced.

In terms of market reforms, ACPET supports the changes adopted by the Victorian Government in its Securing Jobs for Your Future policy which is underpinned by:

• Being user focused - ensuring individuals and businesses are the central focus of the new skills system. Individuals will be supported in undertaking education and training at various levels and encouraged to move on to higher levels of learning. Workforce development services will be provided directly to businesses and industry will play a key role in stimulating demand.

• Informed users - giving individual learners, employers and businesses clear and easy-to-find information about the skills system and what it offers, detail of current employment shortages and where industry is heading.

• Responsive providers - providing more education and training places, with a wider choice of quality providers, with a fairer fee structure. Education and training provision will be responsive to individuals’ and businesses’ needs and subject to competitive pricing, resulting in more choice for individuals and businesses.

ACPET also supports the need to gather accurate industry intelligence including employers’ expenditure on training. As employers, education and training providers also engage with staff training however, ACPET does not support an approach of mandating how data is collected as is currently the case with the implementation of the AQTF Quality Indicators Resources Package which is forcing education and training providers, as employers, to use set templates to survey clients (employers and students). What other industry dictates to employers about how to survey clients?

d. Regulating and ensuring quality services and products

As stated previously, ACPET does see value in a national regulatory body, however there is also value in choice and therefore would prefer to see more options before providing support for national statutory arrangements for VET regulation and quality. If an independent board is established for the
purpose of national regulation, ACPET as the peak, national industry voice for private education and training, would expect to be represented on this body.

It is important that any regulatory body addresses the difficulties in implementation of AQTF risk management outlined by KPMG’s Formative Evaluation of Implementation of AQTF 2007, November 2008 including:

- Varied implementation of AQTF 2007 National Guideline for Risk Management across jurisdictions;
- Validity and reliability of the risk management approach, and variation in linkage between the risk management protocols and the treatment of risk by Registering Bodies; and
- Challenges experienced by auditors in shifting to the AQTF 2007 audit approach have limited the extent to which effectiveness in implementation of the [new] audit approach has been achieved.

ACPET does support a more consistent national framework for purchasing contracts with agreed core standards but stress the need to streamline regulation to ensure that providers do not face additional regulatory burdens through more audits. It is important that regulatory processes such as proof of compliance and financial viability are integrated into a single audit system.

e. Using information for system performance and client choice

ACPET has reservations about supporting one organisation in the role of system performance evaluator. How and what is measured to gauge performance is still the topic of debate amongst researchers particularly in a VET system which is attempting to align to the wide range of clients and their needs as well as ongoing debate about ‘what are the indicators or determinates of success?’

ACPET is keen to work with the Government and other stakeholders to improve data collection for system performance and client choice, especially in regard to supply issues, and in particular, the provision of vocational education and training in Australia through the private sector. At present, there is very limited data on courses offered, or the numbers of students studying in non-funded places in the private education and training sector. ACPET believes this is a serious gap in the Government’s knowledge of current VET practices.

There is growing recognition that the private provision of VET in Australia has grown into a thriving industry that makes a considerable contribution to the national training effort, but the nation holds only poor data on the size of this contribution, its profile or its participants. From the private education and training sector viewpoint, that is an unsatisfactory position since it does not develop a public perception of the value of the sector to the nation; and it is unsatisfactory from a government perspective in that without a clear knowledge of the total VET effort, there can only be partial planning of future growth in VET, its outputs, its contribution to the economy and economic development, and to its role in providing greater equity.
ACPET support that there is room to consider the data requirements required for government planning purposes separately from the data that would be used by the private education and training sector for business, publicity and political purposes. A government data collection could include:

- Enrolments by qualification;
- Competency outcomes; and possibly
- Gender, age, nationality, location and perhaps other equity data on each learner.

ACPET supports that other data may be collected by the private sector at the same time but stored and used by the private sector for its own purposes. Hence, there is a case for a private provider controlled and owned data collection process that feeds part of data collected into a national database but retains the rest of the collected data for the use by the private sector only, to meet its own purposes.

ACPET also see the need for:

- Clear and very public objectives to support the need to collect the data and the uses to which the data will be put;
- Consultations with private and public providers should be part of the process of developing and publicising these objectives;
- The data collection agency appointed to undertake the task of collection, storage and reporting needs to be politically and commercially independent and definitely independent of any VET purchasing function; and
- Providers need to be assured that the data they provide to the National VET data collection will also serve the requirements of the State jurisdiction relevant to each provider.

f. Providing training services that meet needs

Despite a limited competitive national market for VET, independent providers have managed to develop a significant and growing share of the training market. This growth has developed due to the private sector’s ability to quickly adapt to the needs of clients (individuals and employers) and deliver the skills training required. This ability indicates that it is the private sector which is well-positioned to deliver the flexible and time responsive training needed to equip and further develop Australia’s workforce as well as meet individual learners’ needs.

The ability of the private sector to meet the needs of job seekers and the likely increase in the unemployed due to the current global financial crisis is most evident through the Productivity Places Program. Under this program, the private sector which can quickly adapt to the needs of the learner, has and is delivering approximately 75,000 of the 77,000 places which have been allocated. It is the independent providers, delivering flexible, time-responsive training to learners which have the ability and drive to cater for the diverse range of learning needs, but to also deliver under difficult circumstances.
ACPET fully supports an education and training system where there is no advantage given to institutes by virtue of their public sector ownership and that there should be a truly competitive national VET market. Full contestability for the public training dollar including User Choice funds will help to improve the quality of delivery.

ACPET supports a demand driven funding approach and recommend that all training up to Certificate IV is fully funded with an income contingent loan system available to individuals for higher qualifications. ACPET also supports a system of funding which follows the client rather than funding the institutions. With improved information the client can make an informed choice to choose the most suitable education and training provider.

In supporting full contestability for funding, ACPET as a member organisation for independent providers could and should play a role in determining quality provision standards particularly regarding financial viability and where there is no advantage given to institutes by virtue of their public sector ownership.

It is vital that in COAG’s focus on human capital and labour market efficiency and productivity that governments do not lose sight of the fundamental and inalienable right of individual learners and workers to be self-determining in a democratic market economy.

This observation is reinforced by the OECD priority given to building personal attributes relevant to a Knowledge Economy where it is in fact the ‘people’ who are the repositories of knowledge (and skills). The Bradley Review also argues:

that a (reconfigured) Tertiary Education Sector must shift its approach back to being demand driven by student choice (self-determination over what and where individuals choose to learn) if Australia is to have any hope of maintaining its current OECD position by retaining or increasing the level of engagement and participation of people in education and training that is necessary in a Knowledge Economy post 2010$^2$.

The continued growth of the private sector in meeting the needs of learners, even when a significant portion of this growth is from fee for service programs not underpinned by government funding, is indicative that it is the independent provider which is not only meeting individual learners’ needs but is also engaging with industry to deliver flexible, time responsive training.

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$^2$ Higher Education Review – pg 7