Review of the alignment between the *Standards for VET Accredited Courses 2012* and *Standards for Training Packages*

Discussion Paper

September 2016

ACPET submission

Introduction

The Australian Council for Private Education and Training (ACPET) welcomes the opportunity to provide a response to the *Review of the alignment between the Standards for VET Accredited Courses 2012 and Standards for Training Packages – Discussion Paper.*

Established in 1992, ACPET is the national industry association for private providers of post-compulsory education and training. ACPET has over 1,000 members nationally who deliver a range of Higher Education, VET and English language courses across all States and Territories and internationally.

ACPET's mission is to enhance quality, greater choice and innovation in Australian education and skills training. ACPET members include commercial and not-for-profit entities, community groups, industry providers and enterprise-based organisations. ACPET works with governments, industries and community organisations to ensure Higher Education and VET Services are well targeted, accessible, and delivered to a high standard.

Preface

This review needs to be cognisant of the impact of potential reforms on students and the needs of industry and the broader economy.

As indicated in previous *Review of Training Package and Accredited Courses – Discussion Paper* ACPET received strong support to retain accredited courses that fill a genuine gap which cannot be filled immediately by training package qualifications.

While the discussion paper has identified a need for the review to consider where alignment and greater consistency can be achieved between Standards for VET Accredited Courses 2012 and Standards for Training Packages, it is also important the flexibility to respond to student and industry needs is maintained.

It is important that providers retain an ability to customise course structures to suit student and industry needs. To limit this flexibility may inhibit innovation and the capacity to cater to emerging or new industry needs in an increasingly dynamic environment.

While alignment between accredited course and training package standards are the focus of the discussion paper it is worth noting that there is a 'disconnect' between states with Victorian and Western Australia course accreditation processes differing from that of ASQA.

More broadly, it is also noted that CISC has authorised a high level review of training products. Any significant changes to the VET product 'framework' might best be considered in light of the outcomes of this work.

The following advice is provided in relation to the relevant standards identified in the discussion paper.

Introductory statements

VET Accredited Courses (VAC) Standards 1 – 5	Standards for Training Packages
Introductory purpose statements, definitions and administrative arrangements	Standards 1-3 list the product and policy components of training packages

Consultation Question – VAC 1 –5

1. *Are there any alignment concerns in relation to the introductory standards that need to be addressed?*

   No recommended changes.

Duplication

VAC 6.1	Standards for Training Packages
The course outcome must not duplicate, by title or coverage, the outcomes of an endorsed Training Package qualification.	No comparable standard

Consultation questions – VAC 6.1

2. *To what extent is there evidence of duplication between training packages and accredited courses?*

   ACPET does not believe there is significant evidence of duplication. As noted in the discussion paper, the total number of accredited courses has decreased from 1,988 to 948 since 2011. In the revised standards, VAC 7.2 requires consultation with the relevant Industry Skills Council to ensure that the course does not duplicate, by title or coverage, the outcomes of an endorsed Training Package qualification. This requirement is sufficient.

3. *To what extent does the role of an accredited course include addressing not only new technical material, but innovative ways of combining existing qualifications that may not be currently reflected in training packages?*

   Accredited courses allow training providers to address new/emerging technical material in innovative ways. The qualification packaging rules in training packages, at times, may not meet the need for a particular skill set or individuals requiring a unique outcome. Accredited courses offer the ability to package units or develop new material in an innovative way and offer flexibility to achieve the required outcome.

4. *Should VAC 6.1 be strengthened to ensure duplication is minimised? How could a revised standard be worded?*

   No changes recommended.

Course design

VAC 7.1	Standards for Training Packages – Standard 3
VET accredited courses are based on established industry, enterprise, education, legislative or community need.	Training Package developers comply with the NSSC Training Package Development and Endorsement Process policy.

Consultation questions - VAC 7.1

5. *Should accredited courses be required to have a unique vocational outcome? Why/why not? Are there some accredited courses which should just have a general educational outcome?*

    Accredited courses are designed to provide flexibility and responsiveness to industry and student needs. Courses are designed to fulfil a range of purposes that, while having vocational outcomes, are often built around work aspects that differ from training packages or are tailored to particular student cohort needs. The flexibility of being able to develop a program that may not have a unique vocational outcome should remain.

    Accredited courses are also a key way in which the training system can respond quickly to emerging training needs, in particular, in rapidly evolving industries. Broader educational outcomes are becoming increasingly required as industry seeks more creativity and innovation in its workforce. Should this be limited strictly to unique vocational outcomes, accredited courses will become harder to design, develop and accredit.

    The data provided in the discussion paper indicates 61 per cent of program enrolments in nationally accredited courses were in mixed field programs, which include developing basic literacy and numeracy as well as employability and job search skills. These outcomes do not link to unique vocational outcomes.

    A unique vocational outcome should not be a mandatory requirement of accredited courses.

6. *If accredited courses are required to have a unique vocational outcome will this assist this with duplication?*

    See comments above.

7. *Should the Standards for VET Accredited Courses 2012 specify the evidence requirements in relation to the need for the course and validation of the content? If so, should this be in a schedule or through compliance with regulator guidance?*

    No changes recommended.

VAC 7.2	Standards for Training Packages – Standard 5
VET accredited courses are based on nationally endorsed units of competency where these are available and where these are not available the course is based on: (a) units of competency developed as part of the course; or (b) modules. These units of competency or modules are developed in consultation with, and validated by, industry, enterprise, community and/or professional groups and documented in accordance with nationally agreed specifications, consistent with the requirements of the Training Package Development Handbook. Consultation with Industry Skills Council must take place to ensure that the course does not duplicate, by title or coverage, the outcomes of an endorsed Training Package qualification	Units of competency specify the standards of performance required in the workplace. **Standards for Training Packages – Standard 5** The structure of units of competency complies with the unit of competency template. Validation by industry is covered in the Training Package Development and Endorsement Process Policy and Companion volume template.

Consultation Questions – VAC 7.2

8. *Should modules continue to be able to be included as an option in accredited courses? If not, what arrangements should be in place for courses that currently contain modules?*

    At present there is inconsistency with ASQA not accepting modules in accredited courses however modules are still accepted by the TAC in Western Australia and VRQA in Victoria. This requires alignment.

    The inclusion of modules in accredited courses should be discontinued with appropriate transition arrangements.

9. *Should the Standards for VET Accredited Courses 2012 use the Standards for Training Packages templates for units of competency and assessment requirements?*

    If units of competency only are adopted nationally, VAC 7.2 should be updated to reflect usage of the unit of competency template from the Standards for Training Packages.

10. *Should the qualification template also be used?*

    Given there are is only a minor difference between the existing templates, the qualification template from the Standards for Training Packages should be adopted.

Course outcomes

VAC 7.3	Standards for Training Packages – Standard 8
VET accredited courses either: (a) lead to a VET qualification and have course outcomes that are consistent with the Australian Qualifications Framework qualification descriptor identified for the course; or (b) lead only to a VET statement of attainment when course outcomes meet an identified industry/enterprise/ community need but do not have the breadth and depth required for a VET qualification as stated in the guidelines for qualifications in the Australian Qualifications Framework. The course title will read 'Course in…'.	Qualifications comply with the Australian Qualifications Framework specification for that qualification type. **Standards for Training Packages – Standard 9** The structure of the information for the Australian Qualifications Framework qualification complies with the qualification template.

Consultation Question – VAC 7.3

11. *Should the Standards for VET Accredited Courses 2012 be amended to remove references to course duration? Why/why not?*

    Member feedback indicates the inclusion of a specific duration limits the flexibility of accredited courses to develop an individualised learning plan depending on the cohort and the delivery mode. Course duration should be removed or replaced with duration range guidance.

VAC 7.4	Standards for Training Packages – Unit of Competency template
VET accredited courses identify employability skills relevant to the course outcomes.	Foundation skills field **Standards for Training Package - Companion Volume template** • List of AQF qualifications, Skill Sets and units of competency in the Training Package, includes foundation skills. • Industry sectors and occupational outcomes of qualifications.

Consultation Question – VAC 7.4

12. *Should the reference to 'employability skills' in the Standards for VET Accredited Courses 2012 be replaced with 'foundation skills'? Why/why not?*

Given foundation skills as referred to in the Standards for Training Packages includes the combination of LLN and employability skills it is appropriate to replace the term employability skills with foundation skills.

Course outcomes

VAC 7.5	Qualification template
VET accredited courses confirm recognition to be given to the course by licensing, regulatory, professional or industry bodies where applicable.	A description of the qualification outcomes including any licensing, legislative, regulatory or certification considerations. **Standards for Training Package - Companion Volume template** Regulation and licensing implications for implementation.

Consultation Question – VAC 7.5

13. *Are there any alignment concerns in relation to VAC 7.5 that need to be addressed?*

No changes recommended.

Course rules and structure

VAC 7.6	Standards for Training Packages - Qualification template
VET accredited courses specify rules for the structure of the course.	• Specifies the total number of units of competency required to achieve the qualification. • Specifies the number of core and elective units. • Lists all core and elective unit codes and titles, including prerequisite units where they apply.

Consultation Question – VAC 7.6

14. *Are there any alignment concerns in relation to VAC 7.6 that need to be addressed?*

No recommended changes.

VAC 7.7	Standards for Training Packages – Standard 10
VET accredited courses identify exit points from the course which provide for vocational or educational outcomes where applicable.	Credit arrangements existing between Training Package qualifications and Higher Education qualifications are listed in a format that complies with the credit arrangements template.
VAC 7.8	**Companion volume template**
VET accredited courses provide information on educational pathways and articulation where applicable	Pathways advice, particularly in line with requirements of the AQF Pathways Policy.

Consultation Question – VAC 7.8

15. *Should VAC 7.8 be amended to explicitly refer to credit arrangements and/or the AQF pathways policy? Why/why not?*

The inclusion of credit transfer arrangements and/or AQF pathways is supported.

VAC 7.9	Standards for Training Packages – Qualifications template
VET accredited courses specify any entry requirements to the course and justify any explicit limitations to access.	Specifies any mandatory entry requirements (optional).
	Companion volume template
	• Explanation of any mandatory entry requirements for qualifications.
	• Access and equity considerations

Consultation Question – VAC 7.9

16. *Are there any alignment concerns in relation to VAC 7.9 that need to be addressed?*

No recommended changes.

Assessment

VAC 7.10	Standards for Training Packages – Standard 6
VET accredited courses specify course assessment strategies, which: a) are valid, reliable, flexible and fair; b) support the collection of evidence that is sufficient, valid, authentic and current; c) are consistent with the assessment requirements in the relevant Training Package(s) where nationally endorsed units of competency are used; d) ensure that workplace and regulatory requirements, where relevant, are met; e) identify and justify any requirements for workplace and/or simulated assessment	Assessment requirements specify the evidence and required conditions for assessment. **Standards for Training Packages – Standard 7** Every unit of competency has associated assessment requirements. The structure of assessment requirements complies with the assessment requirements template. **Assessment Requirements Template** Performance evidence, knowledge evidence and assessment conditions are specified.

Consultation Question – VAC 7.10

17. *Should VAC 7.10 be strengthened to align with the training packages assessment requirements template? If so, how should this be done? Should the assessment requirements be mandatory or optional? If not, why not?*

    A consistent assessment template based on the training packages assessment requirements template is supported.

Delivery

VAC 7.11	Standards for Training Packages
VET accredited courses provide guidance on appropriate delivery modes, together with advice on limitations on course delivery modes and any requirements for on-the-job training.	No specific relevant standard.

Consultation Question – VAC 7.11

18. *Should the Standards for VET Accredited Courses 2012 retain the requirement for course developers to provide guidance on appropriate delivery modes? Why/why not?*

    Given there is increasing stakeholder feedback that certain delivery modes may not be suitable for some programs, guidance on appropriate delivery modes should be maintained.

VAC 7.12	Standards for Training Packages assessment requirements template
VET accredited courses specify specialist facilities and resources and the vocational competency requirements of trainers and assessors for the delivery of the course.	Specifies performance and knowledge evidence and assessment conditions, which includes assessor requirements and allows for equipment and material to be specified.

Consultation Question – VAC 7.12

19. *If the Standards for Training Packages assessment requirements are incorporated into the Standards for VET Accredited Courses 2012 should VAC 7.12 remain or be removed?*

If the Standards for Training Packages assessment requirements are incorporated, VAC 7.12 can be removed.

Monitoring and evaluation

VAC 7.13	Standards for Training Packages – Standard 3
VET accredited courses identify course monitoring and evaluation processes which will ensure that the course content and outcomes are reviewed and remain current and relevant throughout the period of accreditation.	Training Package developers must comply with Training Package Development and Endorsement Process Policy.
VAC 8.1	This policy identifies that:
The following obligations apply throughout the course accreditation period:	• A continuous improvement plan will be updated annually by an ISC and sets out the work to be undertaken on the endorsed components of Training Packages to meet the existing and emerging skill needs of industry.
The person in respect of whom a course is accredited will:	
a) monitor and evaluate the VET accredited course in accordance with the processes outlined in the VET accredited course document;	
b) inform the National VET Regulator of any proposed significant changes to the VET accredited course and, if required, provide any relevant material to enable the National VET Regulator to confirm that the course remains current and relevant and that it continues to comply with the Standards for VET Accredited Courses 2012 during the period of accreditation.	
c) advise RTOs licensed/franchised to deliver the course of changes made as the result of course monitoring and evaluation;	

d) not make any misleading statement regarding its VET accredited course; and e) if required, participate in strategic evaluations initiated by the National VET Regulator, the Ministerial council, or a delegate of the Ministerial council.	

Consultation Question - VAC 7.13 and VAC 8.1

20. Should the Standards for VET Accredited Courses 2012 specify regular monitoring and evaluation for accredited courses within the accreditation period? If so, how?

No changes required.

Transparency

Consultation Question – Terms of Reference

21. Should the owners of accredited courses be required to publish additional information about their course? If so, how much information should be published?

Course developers should be required to publish enough information to inform employers and students about the scope and purpose of the course (including units of competency). This information should be detailed enough to allow employers and students to make informed decisions. RTOs should be able to choose how (and if) further information can be accessed (e.g. RTOs website, requests, etc.)