

Unduly short VET courses

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The Australian Council of Trade Unions (ACTU) welcomes the opportunity to provide a submission to this inquiry. The ACTU is the peak body of the Australian union movement and the largest and most representative body of Australian workers..

The effectiveness and quality of the vocational education system and the training it delivers are of significant importance to unions and workers. The VET system provides training that allows workers to progress in their career and make career changes. It also ensures that workers are able to operate safely in the workplace. A properly functioning vocational education system ensures that the economy has the skills it needs to develop and fill the jobs of the future and is one of the engine-rooms of our economy.

Unduly short vocational education courses weaken the system, providing students with sub-par training, costing tax-payer dollars and undermining the faith of industry in the ability of the system to deliver effective training. Short and poor-quality training has long been a serious issue in the VET system, as previous ASQA investigations into specific courses or industries have shown. It has been disappointing that, until now, this issue has been dealt with piecemeal by the regulator - driven by an erroneous belief that the issue is confined to particular courses or industries. The ACTU hopes that this process will see a whole-of-system approach implemented which will see quality training once again become the standard in VET.

The institution of a minimum acceptable delivery period for VET courses would provide certainty for students, providers and employers about the quality and efficacy of VET training. We believe that a minimum acceptable delivery period should be developed for all training packages. This requirement would set out the minimum number of hours under professional instruction for the course as well allowing other factors such as number and type of assessments, the form of the training (online, face-to-face etc) as well as any other matters relating to training delivery (requirement for a training contract, etc.).

Minimum hours, determined by industry experts, allow students and employers to be sure that a course is being delivered properly. The ACTU notes that the discussion paper raised the issue of allowing provider 'innovation' in terms of course length. This is problematic for a number of reasons. While allowing provider innovation is important, it should not be done at the expense of quality training. If a panel of industry experts has determined that a course can only be effectively delivered in a certain number of hours and in a particular way, it is broadly undesirable for a provider to 'innovate' around these requirements. While this perspective may appear 'anti-innovation' at first glance, we must consider the historical context in which we are operating. Sadly, experience has shown that the number of poor-quality for-profit providers willing to take advantage of flexibility in requirements has far outweighed the few institutions whose interest in flexibility has been to deliver better training as opposed to increased profits. In order to ensure genuine innovation can occur, the minimum requirements should be true minimums, not some more subjective 'desirable course length', but this should be the greatest concession made to innovation in the setting of these requirements.

As the Discussion Paper accompanying this review has correctly identified, the Industry Reference Committees (IRCs) for each training package are by far the best-placed bodies to determine minimum course length and other standards. IRC members, particularly the union representatives, are long-term industry experts. IRC representatives are also more likely than other bodies to emphasise the quality of

training over other considerations, such as individual employer demands for short and cheap training or provider demands for 'flexibility'.

We note that the Discussion Paper seeks advice as to how RTOs could be involved in the standard setting process. This position should be fulfilled by TAFEs, who could be included in the consultation process with each IRC to ensure training provider's views are represented without allowing the interests of private providers to distort the purpose of the process. There is however one issue in practical terms with asking IRCs to perform this function – namely that many IRCs are currently significantly over-worked and may not be able to undertake additional tasks. Union IRC representatives have been reporting for some time that the IRC systems is, in many cases, not operating as intended. Skilled Service Organisations are, apparently in the search for billable activity, flooding IRCs with work, imposing unrealistic deadlines and showing little interest in assisting IRCs to effectively design training products. The IRC system is not currently functioning as designed and may require reform before it can reasonably be expected to carry out additional duties as part of any findings by this review.

In terms of determining for which courses these standards should be set, while the ACTU has no prima facie issues with the factors considered by ASQA as part of the risk-based approach, we do question the need for a risk-based approach at all. We can see no compelling reason why all courses should not at least have the capacity for these standards to be set, if determined as necessary by the relevant IRC. If however the Department is determined that a risk-based approach be applied, we suggest that some attention be given to the nature of the course material. Courses such as the construction white card, which has already been the subject of an ASQA review, which act as 'tickets' to work and are intended to ensure workers and workplaces are safe, should be considered strongly for default inclusion as part of any risk assessment.

While the ACTU believes that minimum standards, such as course length, need to be set for all VET courses, caution must be taken in their implementation. Firstly, steps must be taken to ensure that minimums set out in training products are treated as true minimums and not as functional maximums. There is a possibility that state governments, seeking to reduce expenditure, would effectively mandate minimums as maximums through refusals to fund any additional training hours beyond the minimum. This outcome must be strenuously avoided, particularly if the minimums are correctly formulated as outlined above. It must also be acknowledged that minimum course durations will reinforce a wider systemic issue with vocational training, namely that it is funded on the basis of process rather than outcomes. Training is, in all states, still funded based on 'training hours' and little to no attention is paid to whether the training achieves the purpose for which it was undertaken. The institution of minimum course duration will reinforce this system. However, it would represent only a small influence within the much larger system which perpetuates the transactional model of training and would at least bring about some improvements in quality where implemented.

The ACTU believes that minimum acceptable delivery period which allows IRCs to set a number of minimum requirements, including course duration, delivery model and other factors (such as use of training contracts) would be an effective solution to many of the issues caused by unduly short VET courses. It is our hope that this review will deliver a real commitment on behalf of all parties to ensure we have a fit-for-purpose VET system which has quality training at its core.