AUSTRALASIAN CURRICULUM, ASSESSMENT AND CERTIFICATION AUTHORITIES

Review of Training Packages and Accredited Courses
ACACA VET Subgroup Submission

February 2015

1. Introduction

1.1. The following submission aims to provide an outline of the implications for secondary education under the training package and accredited course reform. In addition, it is acknowledged that the intersection between education, training and industry, can often be a source of confusion for various stakeholders and as such additional information pertaining to the secondary education landscape provides a context for the Taskforce to gauge any hidden potential impacts of the reform.

1.2. VET plays a significant role in secondary education. Young people live in a time which no longer requires them to choose between work and education. The value of completing secondary education is well founded in modern research. The ACACA agencies within the various Senior Secondary Certificates of Education (SSCE) acknowledge this by accommodating students who engage in a general education and commence training towards their career simultaneously.

1.3. Despite often oppositional views held by some stakeholders in relation to VET undertaken by secondary students, the education sector regularly observe examples which highlight the benefits of combining the learning opportunities and outcomes of the two complementary systems for young adults. It follows that Industry may benefit from a pool of school leavers who possess strong foundational skills in addition to entry level skills specific to their relevant industry.

1.4. All the Australian ACACA agencies are committed to providing senior secondary students with a Senior Secondary Certificate that has long-term integrity and credibility and that reflects achievement in a wide range of studies that will support secondary students to maximise post school opportunities.

1.5. In each Australian state and territory, nationally recognised VET is included in the range of studies that can contribute to the completion requirements of the Senior Secondary Certificate.

2. Background

Role of ACACA agencies

2.1 In Australia, each state and territory possesses separate legislation that defines the responsibility of an ACACA agency, often known as a Board of Studies or a Curriculum and Assessment Authority, to award a Senior Secondary Certificate of Education to students who fulfil its requirements.

2.2 The Senior Secondary Certificate of Education in each state and territory is issued in accordance with the Australian Qualifications Framework. The AQF specifies the standards for educational qualifications in Australia for the school sector, the VET sector and the higher education sector.

2.3   The Senior Secondary Certificate of Education in each state and territory is known as the following:

- ACT   ACT Year 12 Certificate
- New South Wales   Higher School Certificate (HSC)
- Northern Territory   Northern Territory Certificate of Education and Training (NTCET)
- Queensland   Queensland Certificate of Education (QCE)
- South Australia   South Australian Certificate of Education (SACE)
- Tasmania   Tasmanian Certificate of Education (TCE)
- Victoria   Victorian Certificate of Education (VCE)
                         Victorian Certificate of Applied Learning (VCAL)
- Western Australia   Western Australian Certificate of Education (WACE).

Recognition arrangements between VET and Senior Secondary Certificates

2.4   Australian ACACA agencies operate well-established recognition arrangements between VET and the Senior Secondary Certificates they issue. These arrangements support diversity of studies and provide students with clear and explicit pathways to further learning and employment.

2.5   Australian ACACA agencies share common principles and practices for the recognition arrangements between VET and the Senior Secondary Certificate of each state and territory. The recognition arrangements include the following:

2.5.1   all VET given credit towards a Senior Secondary Certificate is drawn from nationally recognised training packages or accredited courses;

2.5.2   the VET is delivered and/or assessed either by, or in partnership with, RTOs who comply with the VET Quality Framework;

2.5.3   all VET that gains credit towards a Senior Secondary Certificate is assessed within a competency-based assessment framework by assessors who comply with the VET Quality Framework;

2.5.4   students are awarded nationally recognised VET qualifications and/or Statements of Attainment by the RTO delivering and/or assessing the VET;

2.5.5   each ACACA agency consults with industry groups at the state or territory level in making decisions about the recognition arrangements between VET and its Senior Secondary Certificate.

2.6   The way the VET recognition arrangements contribute to the completion requirements of the respective Senior Secondary Certificate in each Australian state or territory is the product of the agency's overall policy context and its collaboration with key stakeholders.

2.7 Australian ACACA agencies respect the responsibility and authority of the VET sector for the management of quality standards, the overall integrity of VET and the validity and reliability of assessment in this sector.

2.8 Each Australian ACACA agency manages the recognition arrangements on the basis that the quality of VET is regulated by the VET system through the functions of the Australian Skills Quality Authority and the VET Quality Framework.

2.9 ACACA is clear that the VET that features in the recognition arrangements for Senior Secondary Certificates and the VET that is delivered in other areas of the VET sector are both regulated under the same standards, quality assurance and national recognition.

VET delivered to secondary students - context and clarification

2.10 The ACACA agencies affirm that the term 'VET in Schools' has been mistakenly used by a range of groups as an entity in itself.

Instances of the inappropriate use of the term have included:

- o 'VET in Schools qualifications': no such qualifications exist in the Australian Qualifications Framework
- o 'VET in Schools programs': the programs may refer to:
    - o VET managed by the VET sector; or
    - o vocational learning courses/subjects managed by the school sector; or
    - o other forms of student support services such as career counselling.

2.11 The definition of a 'school' has also become more complex in relation to the learning needs and pathways of young people engaged in senior secondary education:

- o students can be enrolled concurrently in more than one institution and public funding for the student's learning is not allocated to only the one institution
- o the structure of schools has been expanded to include, for instance, Trade Training Centres/Trades Skills Centres and Technical Colleges
- o students undertake Australian School-based Apprenticeships and Traineeships where their place of learning includes the workplace.

2.12 In the present context, ACACA considers that the term "VET in Schools" does not adequately represent the relationship between VET and senior secondary education nor does it appropriately represent the recognition arrangements between VET and Senior Secondary Certificates.

2.13 ACACA affirms that VET delivered to secondary students is and should continue to be the same as VET delivered to non-secondary students. No distinction is required, and any attempts to do so may lead to ambiguity about outcomes and create transitory issues for students entering the workforce and/or further education. The education sector accepts that VET undertaken as a part of a secondary education program must comply with national standards and as such the necessary measures are taken to ensure it is delivered, assessed and certified under the same set of conditionsas VET undertaken by non-secondary

students. If in fact a VET program is modified outside of specifications stipulated in a training package, or delivered, assessed, or moderated under a different set of standards then it is not recognised as VET within the SSCE by ACACA agencies.

3. **Reform Focus areas**

Whilst the focus of this section relates to the relevant issues identified in the *Review of Training Packages and Accredited Courses Discussion paper*, some of the points raised may be considered as a part of the greater VET reform agenda.

3.1 *Range of AQF levels recognised within Senior Secondary Certificates*

ACACA agencies acknowledge that Certificates I, and many Certificates II, are designed to provide preparatory/prevocational level training. The nature and status of this level of VET raises the issue as to what is the appropriate amount of AQF level one study within a Senior Secondary Certificate.

ACACA agencies have addressed the issue in part by placing a limit on the amount of credit for which Certificates I, and in some instances Certificates II, can gain credit towards the respective Senior Secondary Certificate.

ACACA considers the review of training packages and accredited courses can generate opportunities for stakeholders to address a range of key issues related to the nature and purpose of entry level training.

In addressing these issues it cannot be assumed that generic and/or entry level qualifications are the most appropriate offering for secondary students. In some industry areas for reasons outlined in section 3.2 below, these entry level qualifications may be, in some instances, the most appropriate offering for secondary school aged students. However, caution must be exercised when applying generalised rules across the breadth of training packages which seek to make a link between the delivery context, age of student and AQF level, as it risks underestimating the capacity, capability and aspirations of 15 to 19 year old secondary students and the regulated and structured system under which they operate.

ACACA believes it is also important to strengthen the opportunities for students to gain credit for higher levels of VET qualifications towards Senior Secondary Certificates where the VET is appropriate for the needs of the student, industry (often at the local level) and context in which it is achieved.

This goal is strategically important in relation to strengthening the status and profile of VET in strengthening Senior Secondary Certificates and to also strengthening the esteem of VET in senior secondary education.

ACACA believes the achievement of this goal is further likely to improve the attractiveness of the vocational training pathway for high-achieving students, both within and beyond their senior secondary studies.

In the majority of cases Certificate II qualifications do not articulate directly into employment; however in many instances they do offer a good foundation into further

training. Certificate II pre-apprenticeships are an example of such an arrangements with structured, industry focused delivery that articulates directly into an apprenticeships in the same or related industry. Additionally, entry level qualifications offer industry the opportunity to foster a relationship with its future workforce which in turn creates a mutually beneficial relationship between the two parties.

Training package developers must consider that there may be secondary students seeking to access training within a particular industry area who have a broad range of abilities, interests and who have access to training under a variety of conditions. For students who have an identified a career path, the opportunity to access qualifications that directly articulate into further high level training (including articulation into university education) must be an option. BY reducing qualification options that are generic and low level to such students may act as an unnecessary barrier to pursuing a career within industry, or force them to choose between staying in formal education, or leaving in order to access the training they require to pursue their career path.

3.2   *Age appropriateness*

ACACA acknowledges that the recognition relationships between higher level VET and Senior Secondary Certificates can raise issues about the age appropriateness of some of the training for young people in senior secondary education.

These issues of age appropriateness can arise in relation to such areas as safety, adult status, level of experience, licensing requirements, and/or prior opportunity for learning.

It can also be a relevant factor when students undertake, or are offered, higher levels of training when they do not yet possess an appropriate level of experience.

There is some concern with the suggestion made in the *Review of Training Packages and Accredited Courses* discussion paper that a solution to the issue of age appropriateness is to develop alternative qualifications (which may or may not be a part of the AQF) or to homogenize entry level qualifications to avoid misuse.

Some things to consider are:

- What tangible value would these qualifications provide students in the transition from entry level training to job specific training?

- What value would industry place on these new qualifications or qualification alternatives?

- Students who wish to commence training towards their career whilst in secondary education may view the limited offerings as a disincentive to continuing with a formal education and instead opt to enter employment and/or training earlier. With evidence suggesting that students who complete Year 12 studies having better success in their post school pursuits, allowances must be made to accommodate these students so that industry can benefit from young workers who have been better prepared for the world of work and poses strong foundational skills.

    ACACA considers that, in the interests of the individual student and the training provider, these conditions and expectations should be more explicitly identified. If

this detail is to be provided within a training package it should be described in such a manner that does not create unnecessary barriers to students who may possess the experience, knowledge and skills required or have the opportunity to conduct their training in the necessary context to achieve the outcomes prescribed by industry.

Furthermore the term *'school students'* has been used in the paper as a descriptor for the type of learner who may or may not be able to access a particular qualification.

As outlined previously, the concept of 'school' has developed into a complex range of meanings as has the concept of a 'student'. Many students in their final year of secondary education are 18 years of age and as young adults are seeking to maximise their learning experience so as to capitalise on post-secondary education opportunities. It is for this reason that decisions made about the suitability of a qualification should not be based on where a student is registered for their education but rather should be decided based on whether the training conditions under which the qualification is being achieved are in an appropriate context to ensure the qualification outcomes can be met.

The school institution and student characteristics are not static and as such cannot be used as a gauge for appropriateness of a qualification. The full spectrum of student aspirations and capabilities and the partnerships that are currently in effect in many VET programs undertaken by secondary students today must be recognised within any training package review.

3.3 *Workplace delivery and assessment of VET in Training Packages*

There is a clear relationship between VET and the workplace application of the competencies that the training is intended to develop.

In the mind of some stakeholders all VET should therefore occur in the workplace and if it does not do so then it should not be regarded as VET.

This viewpoint ignores the requirements of the quality management systems that the VET sector itself has put in place.

Under these requirements the training must comply with the nationally endorsed Training Package. In reality some Training Packages do not stipulate that the training and assessment of the relevant competencies must occur in the workplace.

The quality assurance systems of ACACA agencies stipulate that the recognition arrangements between VET and Senior Secondary Certificates must be based on the quality management systems of the VET sector.

On this basis, if it is a requirement of the Training Package that the training and assessment must occur in the workplace, then every ACACA agency only recognises that VET if it is compliant.

On the same basis, ACACA agencies also recognise VET that is not delivered and assessed in the workplace if that possibility exists under the conditions set by the Training Package.

Under the arrangements for Australian School-based Apprenticeships the requirements regarding the workplace are clear and explicit.

ACACA acknowledges the value for young people and industry when VET does occur in a work context. Each ACACA agency encourages this connection in various ways. It observes that some states (NSW and WA) mandate work placement under certain VET recognition arrangements.

ACACA considers that the relationship between the workplace and the delivery and assessment of VET deserves further exploration by key stakeholders, including the possible implications of such an exploration for the recognition arrangements between VET and Senior Secondary Certificates.

ACACA observes that the exploration is as directly relevant for the VET sector and industry, as it is for Australian ACACA agencies. Furthermore, it is assumed that if it is stipulated within a training package that work placement, or training and assessment must be carried out in an industry context, that Industry has considered its capacity to meet the demand for such placements.

3.4 *Quality assurance*

Responsibilities and accountabilities of ACACA agencies

Senior Secondary Certificates are significant and well-respected credentials in the Australian community. They document for a young person the culmination of their years of schooling. They are a portable qualification that has currency both nationally and internationally.

ACACA agencies in each Australian state and territory possess the responsibility and accountability, defined in state and territory legislation, for the quality and integrity of their respective Senior Secondary Certificate.

ACACA agencies carry a particular responsibility for the quality assurance of the assessments reported through each Senior Secondary Certificate. They individually manage the quality of the assessments for which they carry direct responsibility.

In relation to the quality assurance for VET assessment, ACACA agencies recognise and accept the quality assurance managed by the VET sector through the application of the VET Quality Framework.

Within this protocol with the VET sector, ACACA agencies nonetheless possess the obligation to ensure the integrity of the Senior Secondary Certificate.

In relation to the VET recognition arrangements, they exercise the obligation by monitoring the quality of the VET assessments reported to them and, as appropriate and on a case-by-case basis, will liaise with the relevant VET regulatory authority where they consider there are integrity matters to be addressed.

Major considerations:

3.4.1   ***Institutional delivery***

The issue of institutional delivery is closely linked to the issue of workplace assessment of VET.

Those stakeholders who assert all VET should occur in the workplace are frequently critical about VET that is delivered and/or assessed in an institutional context.

Stakeholders of VET often associate VET undertaken by school students with institutional delivery when in reality institutional delivery is only one of the delivery modes used by students and schools.

ACACA observes that any issues about the institutional delivery of VET are as directly relevant for the VET sector itself as they may be for ACACA agencies and schools.

ACACA affirms that the quality assurance systems of ACACA agencies for the recognition arrangements between VET and Senior Secondary Certificates are based on the quality management systems of the VET sector.

ACACA agencies recognise VET that is delivered and assessed in an institutional setting if that possibility exists under the conditions set by the Training Package.

ACACA acknowledges that the exploration regarding the relationship between the workplace and the delivery and assessment of VET would lead to a focus on institutional delivery.

3.4.2   ***Online delivery in training***

ACACA agencies have noted a trend in Australia towards the online delivery and assessment of VET by some RTOs. Whereas online delivery is appropriate for some qualifications and industry areas, the concern remains that online delivery is not necessarily appropriate in all cases.

In many cases it is acceptable to acquire the underpinning knowledge and skills of a qualification through an online mode of delivery and assessment. However, in some cases the absence of opportunities for the learner to apply the knowledge and skills in an industry context under the supervision of an industry professional, brings in to question the reliability and validity of the assessment.

ACACA observes that this trend is likely to generate similar, if not greater, concerns from those groups who express criticisms of institutional delivery.

ACACA notes again that this matter relates directly to the conditions for the training delivery and assessment as stipulated in the nationally endorsed Training Packages.

ACACA notes that in the first instance it is a matter for the quality management systems of the VET sector.

3.4.3   *Validity and reliability of assessment*

The overriding commitment to quality is the main point in common between the VET sector and ACACA agencies.

However the management of recognition arrangements between the two sectors is complicated by the fact that each sector uses a different paradigm for quality-assurance:

- the VET sector focuses on an input paradigm that is based primarily on the compliance of operators (trainers, assessors, organisations) with defined standards in their practices to deliver quality

- ACACA agencies focus on an endpoint paradigm that is based primarily on the validity and reliability of the assessment of student learning to deliver quality.

The VET sector is aware of the issues involved in the quality assurance of an assessment of competence. ACACA respects that the matter is one for the VET sector itself to address.

ACACA has taken the policy position that it will acknowledge and respect the outputs of the VET sector's quality management system. This position leads to the commitment to work with the VET sector's paradigm for quality assurance in the context of the recognition arrangements between VET and Senior Secondary Certificates.

At the same time ACACA agencies are obliged to take reasonable steps to ensure the integrity of their Senior Secondary Certificates. The challenge for ACACA then is how best to maintain this integrity, whilst working with the VET sector's quality assurance paradigm.

4. Conclusion

In the past ACACA has participated in strategic engagement with stakeholders including Industry Skills Councils and recognises the value of continuing to work collaboratively with agencies in the VET space. ACACA seeks to continue to engage with relevant stakeholders to explore strategies which aim to:

- Support and promote quality outcomes for Industry and students who undertake VET as a part of their senior secondary education.

- Identify in training packages greater clarity of purpose and outcome for a particular industry area – an example of such an area would be the nature, purpose and outcomes of entry-level training.