

Navitas submission to *Training Product Reform*

Key consultation areas

The Department of Education and Training (the department) seeks stakeholder input on the paper *Training Product Reform: what is the case for change?* which proposes enhancements to the design of training products in vocational education and training (VET) to ensure they support skills development into the future. The paper *Training Product Reform: Issues for Discussion* provides further detail and sets a framework for public consultation. These papers are both available at www.education.gov.au/VET-consultation.

How to provide feedback

Stakeholder consultations begin with the public release of *Training Product Reform: what is the case for change?* in December 2017 and continue through to March 2018.

Respondents may provide feedback on some or all of the paper's themes. To assist with the compilation and analysis of the views of all stakeholders, respondents are encouraged to provide feedback via this preferred submission template. Submissions in alternative formats will also be accepted.

All submissions should be emailed to VETconsultation@education.gov.au.

All submissions will be made publicly available on the department's website, unless respondents direct otherwise. Terms and conditions for public submissions are available on the department's website at www.education.gov.au/terms-and-conditions-public-submissions-department-education.

How feedback will inform policy decisions

Stakeholder responses to the discussion questions will form the basis for the Training Product Reform Joint Working Party's report to COAG Industry and Skills Council on training product reform.

Submission details

* indicates mandatory question

Item	Instruction	Response
1. Submission made on behalf of:*	Please select from the drop down list.	Organisation
2. Full name:*	Complete information in column to right	Kadi Taylor
3. State or territory:*	Please select from the drop down list.	WA
4. Organisation name (if applicable):	Complete information in column to right	Navitas Limited
5. Please indicate your interest in this discussion paper:*	Please select from the drop down list. If the option 'other' applies to you, please specify	Higher education provider Registered Training Provider
6. Please indicate if you do not want your submission to be published on the department's website or otherwise be made publicly available:*	Please select from the drop down list if you do not wish for it to be published. Note information below this table on the publishing of submissions	Choose an item.
7. If you do want your submission published, do you want your details kept anonymous?	Please select from the drop down list if you wish to keep your details anonymous.	Choose an item.

Notes on publishing submissions:

1. Submissions that do not meet web accessibility requirements may not be published. Further information on Australian Government web accessibility requirements is available at www.australia.gov.au/accessibility.
2. If you do not want your submission published on the department's website or otherwise be made publicly available, please advise the department upon making your submission, otherwise all submissions may be published.

Theme 1 discussion questions: The case for change

1. What are the skills, knowledge and abilities that make workers more adaptable and resilient to future workforce changes?
2. How well placed are training products to respond to future workforce demands and skill requirements?
3. What barriers are there which could prevent training products from meeting future workforce needs?
4. Will the design changes proposed improve the ability for training products to respond to future workforce demands and skill requirements?
5. Are the terms 'training packages' and 'training products' fit for purpose? Do they appropriately describe this fundamental VET system infrastructure?
6. How strongly has the case for change been made by the paper *Training Product Reform – what is the case for change?* Does it need refining in particular areas?

COMMENT:

With dynamic workforce change already occurring in Australia and globally, Navitas believes that training product reform is long overdue. Changes in the workforce are already evident and current training packages lack the flexibility to allow Registered Training Organisations (RTOs) to train learners in the skills and knowledge required to enter the workforce, contribute effectively to productivity and benefit from effective, tailored, lifelong learning.

The current approach to training packages has resulted in a design that struggles to keep pace with industry needs and is often misaligned to current industry practices. This is particularly evident in fields where technology changes have a deep and abiding impact. Training products currently are backward-facing rather than forward-facing. They do not sufficiently keep pace with industry changes and too often lag in currency.

Training packages in human services are fragmented in structure and the units of competency are not well integrated. There is a desire for training packages that are less about prescription and more about greater flexibility to meet industry needs.

We urge the inclusion of training to embrace skills and knowledge that are portable and that align with the skills demanded by employers and those seeking to start their own businesses – enterprise or 21st century skills. These include resilience, strategic thinking, adaptability to change, creativity, resourcefulness, agility, critical thinking, communication, reflective thinking and practice, ability to self-manage, taking initiative, innovation mind-set, entrepreneurship and change management. These skills should be integrated across a program of study as iterative content, allowing students to demonstrate achievement in different contexts.

Reforming the concept of competency to describe the 'principles of practice' would be beneficial as it would allow greater latitude for RTOs to make judgements on how delivery and assessment should be conducted, informed by effective and broad industry consultation.

The case for change is very strong as the current vocational and education and training (VET) framework was developed for a different era, with a different concept of what the world of work was like. The current training products are focused on training individuals for specific jobs. Future work requires adaptability and portability. As digital disruption transforms work, many jobs in the future will be lost and therefore there is an urgent need to train the future workforce to be prepared for change. The current training products have not been developed to prepare individuals for the depth and breadth of the expected changes.

Theme 2 discussion questions: Qualification design – Inclusion of foundation skills and future work skills

7. Should future skills and foundation skills form part of all qualifications?
8. How much prescription should there be to accommodate different learner cohorts?
9. Can the current format of units of competency effectively support the learning and assessment of future work skills and foundation skills? Would changes be needed?
10. How could training products specify the assessment of these skills even if a learner's qualification does not include specific units of competency in these skills?
11. What additional skills and knowledge should be incorporated in future work skills which are not currently encapsulated by employability skills? Does the term 'future work skills' convey the intent of these skills or should employability skills be broadened to include these additional skills?
12. Does the current VET workforce have the skills to deliver these units? What, if any, upskilling would be required?

COMMENT:

Navitas supports training packages that are less prescriptive and allow RTOs to have the flexibility to adapt their delivery and assessment in accordance with industry needs.

Future work skills and foundation skills should form part of all qualifications. An appreciation for lifelong learning should be developed within the training package by developing foundationskills.

There should not be too much prescription as an RTO should have the flexibility to accommodate different learner cohorts as appropriate.

The current format of units of competency assists in the development of foundation/employability skills. However, the development of a set of units that prepares students for future changes is a good idea.

The term 'future work skills' appropriately conveys the intent of the skills, however, as in feedback presented in theme 1, many of the 'future work skills' are in fact 'current work skills' in many industries.

Broadly speaking, it is likely that some proportion of the current national VET workforce will not have the skills and experience necessary to deliver 'future work skills' units, and to embed this in their learning and teaching approaches. This will therefore require upskilling of some existing staff and will present the opportunity to bring new staff with these skills into the system.

Theme 3 discussion questions: Qualification design – Technical skills

13. Should technical units have a greater focus on underpinning knowledge and theory?
14. How should underpinning knowledge and theory be assessed?
15. Is the language used to differentiate the components of competence appropriate, or is there other language or terms that better differentiate knowledge and skill?
16. Is there a need to assess technical skills differently in high risk sectors? If so, how?
17. How could skill sets or accredited courses assist in providing specific technical skills required for the workplace?

COMMENT:

Navitas supports a greater focus on underpinning knowledge and theory in technical units. We believe these should be assessed through a range of evidence alternatives, including contextualised case studies, appropriate to the qualification level or Unit of Competence (UoC) outcome. It is imperative, however, that in the vocational sector theory be grounded in practice and knowledge is always applied.

The current language used to differentiate between knowledge and skill is sufficient.

We believe that technical skills should be assessed in the workplace for high risk sectors and where this is not possible assessed in suitable simulated environments.

Skill sets would assist in the development of specific technical skills required in the workplace.

Workers have to multiskill considerably more these days and are required to carry out a range of tasks outside of their position description. Therefore, it is essential that training is provided that is more generic to allow for the ability to multiskill.

In a rapidly changing economy and workforce it is important for vocational graduates to have baseline knowledge and foundation skills on which to build throughout their careers, in which they are likely to have at least 17 jobs in their lifetime. It is also important for those learners who may wish to undertake higher education in the future that they have some underlying knowledge of the concepts and theories of their field. However, again Navitas would highlight that the strength of Australia's vocational system has been that underpinning knowledge is applied to the practical, work-based contexts, producing graduates who are skilled and work-ready.

One option for ensuring each learner is able to meet their desired outcomes – whether it be further study at a higher level or a path direct to employment – is to have more knowledge-based electives available for those students wishing to gain a greater theoretical understanding.

Theme 4 discussion questions: Qualification design – Broadening the vocational outcome

18. What types of jobs require targeted qualifications? Could these jobs be better served by broader qualifications?
19. Would the needs of learners be better met by qualifications that have a targeted or broader outcome? Why?
20. Would the needs of industry be better met by qualifications that have a targeted or broader outcome? Why?
21. If qualifications are matched to a broader range of occupational outcomes, what models will support effective upskilling or retraining?

COMMENT:

There is a range of jobs that require targeted qualifications, for example, jobs in the health sector such as nursing which require specific skills, and jobs in other sectors that require specific technical skills such as the registered trades, eg plumbers, electricians etc.

Some jobs would benefit from qualifications with a broader outcome, however there are industries that require graduates to have a specific skill set.

In the human and community services field, all students could be understood as needing to develop certain core skills, but a broader range of electives would enable RTOs to adapt programs of study that fit within both their existing speciality areas and identified areas of local industry need.

Some jobs require broad qualifications, such as administration, business and customer service which are ideally positioned for the 'future work skills' concepts like adaptability and innovation. Industry could benefit from employees who have a broader application of skills, such as a plumber who can also lead teams, understands and follows systems, or critically analyses problems. This could be achieved through a pathway program. Lifelong learning is not only evidenced through qualification frameworks. Professional and licensing bodies can facilitate industry retraining and upskilling, or licence renewals. Having a strong alignment with licence models and professional development recognition could be a model to use.

Theme 5 discussion questions: Qualification design – Structure of core and elective units

22. Should the design of qualifications specify a minimum number/proportion of core units or a minimum number/proportion of elective units? Should this vary between qualification level or by industry, or should it be consistent?
23. Should qualifications specify a minimum number of the different types of units (technical, foundation, future skills)?
24. Should there be a minimum number of units which should be included from other training packages?
25. If the current flexibility is retained, what other mechanisms could be put in place to assist employers to understand the specific skills which learners have gained through their qualification?
26. Could greater use of specialisations within qualifications achieve a better balance of flexibility and consistency

COMMENT:

Navitas believes that the design of a qualification should include specified core units, and then a range of electives, including a selection of electives from a variety of training packages and future skills. This provides the RTO and the learner with the benefit of choice in identifying their preferred topic areas. There should be a consistent approach to the volume of core units, such as a 50% ratio, across all qualifications.

For employers, they want to know clearly and easily what skills a learner has gained and to what level of competence. The Department, RTOs and employers should come together to determine what is the best way to present / communicate the information about the skills a learner has acquired and to what level.

Navitas believes that learners should be able to tailor their training – within defined parameters – to best achieve the employment or further study outcome they are seeking. Navitas' experience has been that some current qualifications are overly prescriptive and do not meet industry's needs. For example, we deliver the Diploma of Youth Work. It has 21 Units of Competency, which in itself is a relatively high number, and 16 of these are core units. That leaves only five other units of competency as elective, and even that list is restricted. Our industry consultation revealed a considerable gap between what the industry indicated were highest priority learning areas and the training package. With only five elective units it was very difficult to develop a study program that was both compliant and delivered to industry priority areas. Ranges of core units and elective units would have been more helpful in our development of this qualification.

Specialisations may also provide a mechanism for greater flexibility within desired parameters, however it alone will not be sufficient to address the current rigid nature of qualifications design.

Theme 6 discussion questions – Qualification design – Training packages

27. Are 'training packages' useful for determining training needs?
28. Does the system require additional flexibility to enable different ways of grouping qualifications?

COMMENT:

Navitas suggests, as has been proposed by other sector experts (see *CEDA VET: Securing Skills for Growth*) that a framework of 'vocational streams' or 'occupational clusters' that groups similar sets of training packages together, may be a way provide greater flexibility while still ensuring the requisite level of consistency. We suggest governments, RTOs and employers come together to determine how this change could be implemented.

Theme 7 discussion questions: Qualification design – Increasing the use of common units of competency

29. What are the benefits or disadvantages promoting the use of common units?
30. What barriers are currently in the system which prevent the adoption of current units?
31. What would be suitable criteria for determining whether a learning requirement can be met by a common unit of competency?
32. Are there other mechanisms (eg implementation guides, companion volumes) that would overcome potential disadvantages of common units of competency and promote wider adoption?

COMMENT:

Navitas believes that the benefit of using common units, which could be incorporated into our suggestion in the section above on 'vocational streams', is that it would reduce the complexity of a training package by reducing duplication.

The use of common units, such as Workplace Health and Safety (WHS) across similar industries' packages – such as community services, health and beauty services – would also improve consistency for industry and employers. Grouping sectors together and reviewing common units, will enhance portability and transfer of skills.

Navitas believes that barriers currently exist to adopting common units. Work would need to be undertaken to amalgamate the Units of Competency information to be broader and inclusive of the context in which it could be applied. Companion guides could be updated to assist with transition.

RTOs within Navitas have already developed and embedded graduate capabilities in their qualifications. The greater uptake of common units would allow RTOs the ability to adapt their delivery in accordance to learner needs. It would also allow far more flexibility as it would allow RTOs to choose core units that can be assembled to create a more appropriate qualification that reflects industry needs and desired outcomes for the learner.

Common units would also allow for simplicity and allow students to specialise in different areas as required, facilitated by vocational stream and occupational clusters, and 'specialisations'.

Currently, there are qualifications that do not have common units at all even though commonality between them does exist. What this means is that a student would have to complete a whole new qualification when it is not necessary.

There needs to be a pool of units that has the breadth to allow RTOs to select and compile a training program that would make the RTO more responsive to industry needs and changes.

Fundamental – or common – units could be identified for each training package (stream or cluster) and the addition of skill sets would allow for specialisations, providing a learner with skills in multiple areas. Skill sets would allow for greater mobility, enabling an individual to more easily build on existing skills and knowledge to transition to other areas within an industry as required. These changes would make a graduate more employable.

Theme 8 discussion questions: Skill sets

33. What factors contribute to the use of skill sets by your organisation?
34. Should skill sets have a stronger link to the qualification?
35. Could skill sets be used as specialisation within a qualification? What would be the advantages and/or disadvantages?
36. Should skill sets for introductory level students, especially those without a school certificate, be only available after a student has already undertaken a qualification that includes foundation and future work skills?
37. Is there a better way to ensure skill sets meet the needs of industry and students?

COMMENT:

Navitas believes that skill sets speak to employability. Being able to build a qualification via skill sets - with the goal to secure employment responding to an employer or sector need - is an objective that is supported by skill sets. This approach allows for a more personalised approach to training and one that is tailored to a learner's interests and desired outcomes – things that are becoming increasingly important in our rapidly changing workforce.

Skill sets also provide the flexibility for industry and RTOs to respond to changing demands quickly, rather than waiting for an amendment to a full training package. It would also be desirable for skill sets to be individually credentialled without the need to complete a qualification.

Currently, skill sets are not often offered by RTOs as the emphasis has always been on gaining a full qualification and regulatory metrics focus on completion of qualifications. However, as research and experience is showing, there is growing demand from learners and industry for this more flexible approach to skills acquisition.

Linking skill sets to qualifications would be beneficial and encourage regular inclusion, particularly if they were used as a specialisation within a qualification. Qualifications with selected and selective skill sets would allow individuals to personalise their training within a qualification.

Navitas supports the idea of a training package that balances mandated and flexible content. We consider this approach would support the development of agile training to better meet industry needs.

Theme 9 discussion questions: Accredited courses

38. Do you (or your organisation) use accredited courses? What is the primary benefit to you (or your organisation)?
39. Should there be tighter guidelines around what types of courses should be accredited? If so, what should they be?

COMMENT:

The current guidelines for the accreditation of courses are sufficient. Navitas uses accredited courses in the delivery of English language teaching to migrants and job seekers under government-funded programs such as Skills for Education and Employment (SEE) and Adult Migrant English Program (AMEP). These accredited courses were developed because there was a perceived gap in training packages.

The accredited courses meet the lower Australian Qualifications Framework (AQF) demands of the cohort – those significantly challenged for language, literacy and numeracy – and the purpose is not specifically linked to employment outcomes, however it is a possibility. The primary benefit to our organisation is to have a flexible, learner-centred range of tools that the trainers can select and use to assist individuals to develop and build on their language and functional levels as a member of communities, that is, shopping, understanding their rights, and encouraging positive participation such as schooling for children.

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15 March 2018