

Navitas submission – Addressing issues relating to unduly short courses

March 2018

Recommendation one

Recommendation summary

ASQA proposes that a definition of the ‘amount of training’ that focuses on supervised learning and assessment activities be included in the Standards for Registered Training Organisations (RTOs) 2015, the Standards for VET Accredited Courses 2012, the Standards for Training Packages 2012 and the Training Package Development and Endorsement Process Policy.

ASQA acknowledges the amount of training will be different for different learners and recommends that a benchmark should be set for new learners where there is a demonstrated risk from unduly short courses. Also, the report does not contend that all courses with an advertised duration below minimum of the AQF are unduly short or of poor quality. The impact is likely to be greater for those qualifications:

- with the highest enrolment numbers
- in growth industries
- offered to disadvantaged learners
- required for jobs with vulnerable clients and/or with implications for community and workplace health and safety
- in areas where qualifications are a ticket to work.

1 Discussion questions for recommendation one

1.1. What are the important elements in a definition of amount of training in a competency-based training system?

Competency-based training is based on the premise that an individual’s rate of progress is determined by their ability to demonstrate competency in a skill and not based on time served. Prescribing a set number of hours for learning appears contradictory to this principle of a competency-based training system.

Rather than focus on the number of hours required to learn a skill, there should be greater emphasis on the number of times a skill is demonstrated. Learners should also be required to demonstrate a skill in different situations and contexts.

Describing amounts of training should continue to be informed by volume of learning. Benchmarks should be established which describe a volume of learning, similar to what is already defined in the AQF documentation.

If a prescriptive measure is implemented, then unscrupulous providers will be incentivised to exploit the letter of the regulation and use high volume, low cost delivery without any quality measures. Volume without quality measures will likely work contrary to effective training and lead to corrupt practices.

What is your suggestion for a definition of 'amount of training'?

Amounts of training should be described as a volume of learning required to take a learner from the minimum entry standard to defined training package outcomes. A qualitative appraisal of the training and assessment made independently by industry and educational experts would assure quality.

1.2. Where in the regulatory framework would this definition best sit to improve student outcomes?

Volume of learning informing amount of training as a guidance. The volume of learning should be the authoritative definition.

1.3. If an amount of training is defined, how can industry ensure that innovation and flexibility in delivery of training is retained?

As per feedback on recommendation one, prescribing an amount of training will not foster innovation nor will it guarantee quality learning. The introduction of this metric will be open to gaming by unscrupulous providers. Volume of learning allows for innovative practice measured by learner success. The amount of training should also be subject to learner success metrics and industry feedback.

What criteria could be used to ensure the RTO has the scope in which to justify its rationale for shorter course duration?

Criteria that an RTO could use to justify a shorter course duration must include a detailed explanation of how:

- the minimum entry level of individuals undertaking the training and assessment is suitable for a shorter course duration
- a shorter duration will still achieve expected training package outcomes
- the volume of learning will be delivered and assessed in a shorter duration as assessed independently by industry and educational experts.

1.4. For qualifications that would have a prescribed duration, what are the implications for recognition of prior learning, credit transfer and transition of students when qualifications are updated?

Recognition of prior learning (RPL), Credit Transfer and transitions should be based on evidence of skill acquisition rather than time served.

1.5. What is your suggestion for a definition of 'new learner'? What processes would an RTO need to establish to verify a student's new learner status? What documentation would support audit processes?

Recommend that all applicants are deemed new learners unless they can demonstrate or provide evidence that they possess cognate experience or documented skills. The onus should be on the applicant to provide evidence and the RTO to exercise due diligence in assessing the evidence.

1.6. In establishing a definition of amount of training, what are the implications for current definitions of volume of learning in the AQF?

Definitions of the amount of training must include considerations of the effectiveness of delivery modes on learning. The effectiveness of delivery would have implications for the amount of training, learner success and intended industry.

How could the definition of an amount of training (which includes only supervised learning activities) best be aligned in order to inform the review of the AQF and volume of learning (which currently includes supervised and unsupervised learning activities)?

Defining the amount of training will not guarantee that a student has acquired skills and knowledge. Innovative learning practices, which include modes of unsupervised learning, are effective and should not be excluded because of exclusive prescription of supervised learning activities.

Recommendation two

Recommendation summary

ASQA proposes the development of a risk-based approach to the inclusion of an appropriate amount of training when training packages are revised or developed by industry reference committees (IRCs).

Previous reviews by ASQA have provided evidence of risk to quality in a number of sectors—aged and community care, early childhood education and care, security operations, equine programs, construction safety and training and education—and these sectors are identified in the recommendations as priorities and could be considered by their IRCs for the inclusion of a mandatory amount of training.

Just as in Recommendation 1, the impact of unduly short courses is likely to be greater in those qualifications with high enrolment numbers, are needed to skill workers in growth industries, are offered to disadvantaged learners and are necessary for those working with vulnerable clients or with implications for community or workplace health and safety.

Further, the Australian Workforce and Productivity Agency¹ identified a range of other diverse and complex factors which impact on the delivery of high quality training. This included the quality of teaching and training, perceptions of inadequate funding and inadequate support for disadvantaged learners.

2 Discussion questions for recommendation two

2.1. How well are IRCs equipped to provide technical expertise on course delivery arrangements to be able to determine an appropriate amount of training?

IRC members are appointed on their experience and expertise in an industry not on their expertise in training delivery. Without educational expertise an IRC cannot validly provide expert advice on the quality, quantity and delivery approach to achieve required technical expertise.

¹ Australian Workforce and Productivity Agency, March 2013, *2013 National Workforce Development Strategy* <https://docs.education.gov.au/system/files/doc/other/futurefocus2013nwd-2013.pdf>

Who is best placed to provide the technical expertise to IRCs to assist in determining an appropriate amount of training?

Experts in training delivery should advise IRCs on training delivery. If this is to be a role for the Skills Service Organisations (SSOs) then there should be strict scrutiny of the quality and depth of expertise located in the SSOs and the quality of educational support provided by the SSOs to IRCs.

How do RTOs provide input given they are largely excluded from IRC participation?

Consultation has taken place through SSOs. This consultation is public although the breadth and depth of consultation is questionable. Education and training expertise is not represented in the senior executives of SSOs.

2.2. ASQA has identified a range of factors that increase the risk for unduly short courses (page 11). Do you agree with these factors?

Yes, and note other factors to include where occupations have significant interface with and use of technology, eg health care and media.

Are there any other factors that should/could be considered in the context of unduly short courses?

Learning must be assessed using reliable and credible means. Time served does not guarantee learning.

2.3. What other sectors, other than those identified by ASQA, would benefit from this risk based approach to training package development?

No further comment.

How did you identify these sectors (for example, what factors regarding this sector were relevant in making this opinion/decision?)

No further comment.

2.4. Do recent and proposed changes and reforms in the VET sector contribute to dealing with these issues, and are there alternative ways to achieve the same goal?

A risk based approach allows ASQA to target RTOs that are deemed to be high risk using transparent and demonstrable factors. This approach means ASQA can focus its limited resources in a systematic way and not wait until audit or registration events. With regard to short courses, it may be best to include duration that deviates from the sector practice in a training package to be automatically included as a high risk factor. High risk also places the reporting onus upon the RTO to meet a higher threshold of evidence.

Incentivise RTOs that are delivering quality programs and abiding by legislation with low risk reporting thresholds to encourage good practice. ASQA would apply greater scrutiny and pressure on RTOs of high risk. It is recommended that ASQA adopt a standards framework against which risk can be assessed.

Recommendation three

Recommendation summary

ASQA proposes that RTOs would be required to publish a product disclosure statement (PDS) that includes the range of learning activities expected for each training product on their scope of registration. The PDS, to be developed by the Australian Government Department of Education and Training (the department), would be available on RTO websites and the RTO's entry on the My Skills website.

Context

The VET information landscape is viewed as complex by consumers, particularly in comparing information about courses at different RTOs from an authoritative source. The department is working with VET stakeholders to improve the availability of course level information for consumers.

The My Skills website continues to be a trusted source of course and RTO level information for many VET consumers, with annual usage tracking towards two million visits in 2017. As part of the PIVET reforms, the department will work with RTOs to improve course level information on the My Skills website in 2018, including developing ways to improve how consumers may compare courses between RTOs through the RTO performance dashboard.

The Australian Government has also asked an independent review, Professor Valerie Braithwaite, to consider consumer protections during her review of the NVETR Act.

3 Discussion questions for recommendation three

3.1. What impact and costs would a provider face in implementing ASQA's proposal?

It is recommended that RTOs be required to publish accurate and timely information about their courses and we do not think the PDS would contribute any further value to applicants. We recommend that RTOs be required to publish student experience and employer data such as Quality Indicators for Learning and Teaching (QILT) used in the HE sector.

3.2. What impact would this have on the flexibility of RTOs to deliver training?

We do not support the introduction of a PDS. A PDS would reduce flexibility, impede responsiveness to industry changes and learner needs.

3.3. How could a PDS take into consideration the various flexible and innovative ways in which a single training product may be undertaken?

We do not support the introduction of a PDS.

3.4. What would trigger an RTO to update each PDS?

We do not support the introduction of a PDS. A PDS would increase a further burden of compliance upon RTOs with neither demonstrable benefits to applicants nor additional clarity on RTO offerings.

3.5. Are there alternative ways in which training product information could be provided to students to enhance consumer protections, and at which point in their enrolment/training should this be provided?

All RTOs must be expected to maintain an up-to-date, accurate and comprehensive overview of their organisation, student and institutional obligations, course details and the associated outcomes of their courses.

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