

**To whom it may concern,**

In response to the request for feedback on training packages and VET reform please consider my thoughts as below (I attempted to respond via the feedback form but unfortunately it would only allow me access as a read only document).

My response relates specifically to my area of professional expertise which is the **outdoor recreation training package** and the shortcomings I have observed within its application.

- The concept of people being qualified as “trainers / assessors” in a generic sense is unrealistic and unhelpful, without specific technical expertise they are in no position to make any judgement on the quality or validity of the evidence of competency presented.
- The idea that a person who holds the specific unit or qualification plus the generic TAE qualification is able to train and assess another person to that level is not realistic and not in keeping with international professional standards, trainers / assessors should be qualified over and above the level that they train / assess others to (in the case of the highest level qualification the trainer / assessor should hold it plus significant additional experience)
- The differences in interpretation of the units and competency requirements to achieve them by different RTO's throughout the country make the qualifications and skill sets essentially worthless, In reality the validity of the certification and individual holds is based on the perception of the institution and individual staff that delivered the certification.
- The lack of any practical moderation of training and assessment by industry technical experts means that many RTO's are delivering substantially different programmes ranging from historic and outdated techniques through to high quality internationally respected techniques (depending on the individual staff and their professional affiliations)
- The Government funding model of paying RTO's based on completion rates incentivises in entirely the wrong direction for quality assurance
- RTO's are able to have on scope packages in which they have no credible technical expertise, IE outdoor recreation, then deliver RPL based qualification based on their generic TAE status, further diminishing the credibility of the qualifications and skill sets
- The compliance focus appears to be substantially conflicted, RTO's while being “encouraged to assess holistically” seem to be assessed as compliant through ridiculous paper trails and box ticking of slightly adjusted grammar of the original units (I received one RTO example of around 30 pages and 20 assessor and student signatures to complete a single unit!)

For VET qualifications to have any real credibility or reliability within the outdoor recreation industry significant changes are required,

- Alignment with national and international outdoor instructor qualification standards should be implemented
- Any organisation that cannot show specific current professional expertise (highest levels of professional and vocational qualifications plus significant experience both nationally and internationally) should not be allowed to issue qualifications
- Practical moderation across states and country to ensure current (as opposed to historical) practices are being trained and assessed
- The focus needs to be put on demonstration of the actual practical competencies (IE. Actually plan, set up and run a specific outdoor session) as opposed to isolated ticked off performance criteria