Template for submissions 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

<table>
<thead>
<tr>
<th>Item</th>
<th>Instruction</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Submission made on behalf of:*</td>
<td>Please select from the drop down list.</td>
<td>Organisation</td>
</tr>
<tr>
<td>2. Full name:*</td>
<td>Complete information in column to right</td>
<td>Keiko Yasukawa</td>
</tr>
<tr>
<td>3. State or territory:*</td>
<td>Please select from the drop down list.</td>
<td>NSW</td>
</tr>
<tr>
<td>4. Organisation name (if applicable):</td>
<td>Complete information in column to right</td>
<td>NSW Adult Literacy and Numeracy Council</td>
</tr>
<tr>
<td>5. Please indicate your interest in this discussion paper:*</td>
<td>Please select from the drop down list. If the option ‘other’ applies to you, please specify</td>
<td>Other (please specify)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Professional peak body for adult literacy and numeracy practitioners in NSW</td>
</tr>
<tr>
<td>6. Please indicate if you do not want your submission to be published on the department’s website or otherwise be made publicly available:*</td>
<td>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</td>
<td>Choose an item.</td>
</tr>
<tr>
<td>7. If you do want your submission published, do you want your details kept anonymous?</td>
<td>Please select from the drop down list if you wish to keep your details anonymous.</td>
<td>Choose an item.</td>
</tr>
</tbody>
</table>

### Notes on publishing submissions:


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:

Adaptability and resilience are key personal qualities. Employers consistently state that the “soft skills” such as interpersonal skills, teamwork, empathy and cultural awareness are poor in the case of many job applicants and new employees. However, these cannot be assessed, and would lack meaning when taught out of context. Communication and organisation skills are important, along with the ability to self-regulate by personal and critical reflection and ethical practice. In order to develop these capabilities, VET learners need an integrated curriculum that embeds these capabilities in authentic contexts, not as isolated and generic skills.

While we agree with the need for some significant changes, particularly in the VET system’s approach in the area of Foundation Skills, we have deep concerns about the case that has been put in the ‘what is the case for change’ paper.

The paper cites a 2013 AWPA paper about a large proportion of Australians ‘lack[ing] the necessary foundation skills to enable them to participate effectively in the workforce’. This report was published prior to the release of the final results of the OECD PIAAC. Those results showed according to the OECD which sponsored the PIAAC that:

> Adults (aged 16-65) in Australia show above-average proficiency in literacy, and problem solving in technology-rich environments compared with adults in the other countries participating in the survey, but only show average proficiency in numeracy.

> ...  
>Australia shows a good match between the literacy proficiency of workers and the demands of their jobs. (p. 1)

---

The information in the ‘what is the case for change’ paper seems to be conflating the ABS media release from the 2006 OECD Adult Literacy and Lifeskills Survey and the more recent OECD PIAAC survey. What the paper does not mention, however is the finding that ought to be of greater concern:

The link between higher literacy and such social outcomes as trust in others, participation in volunteer and associative activities, belief that an individual can have an impact on the political process, and better health is stronger in Australia than in most other countries. (p. 1)

That is, amongst the group who did perform at the lower levels in literacy and numeracy, there may be a significant risk in relation to their social outcomes. The opportunity, if not the mandate, for the VET system to devise effective ways to address the needs of this group of adults is not highlighted in the current paper.

We also agree with the underlying premise proposed in the paper that foundation skills are required by individuals at all AQF levels. The needs, however, are not static and individuals benefit from opportunities to extend their foundation skills as they progress through, or change careers. Development of foundation skills needs to be in the context of the work the individual is engaged in or preparing for, not in isolation.

\[\text{ibid}\]
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:

Work, employment and careers have all been transformed for many people in the world in recent decades. Workers are much more reliant on their own resources to secure and maintain their livelihood. This means that preparation for work, and preparation for older workers to enter the contemporary workforce requires knowledge and skills for navigating the modern labour market and workplaces. This requires not only the range of ‘core skills for work’ such as collaboration, problem solving, self-management, learning skills, emotional intelligence, self-awareness and perseverance; workers and future workers need education in how the economy works if they are to develop a critical understanding of their position in society, where they could exercise agency to better their life outcomes and contribute economically to better their community. This is the kind of foundation education that all VET learners should be afforded.

For learners in the VET system who are early school leavers, mature aged learners who have never been in the paid workforce, or who have experienced social, economic and/or educational disadvantage during their life, development of the kinds of core skills for work mentioned in the ‘Issues for discussion’ paper would require a curriculum that can be individualised, and a pedagogy that is focussed on helping learners make connections firstly with members of their learning community, before they can productively engage with employment options. The current FSK (and training package approach generally) is too restrictive and forces teachers to expend time and energy ‘working around’ these restrictions. The education of these adult learners are best placed in the hands of pedagogically well qualified adult educators with knowledge and expertise in adult education, including literacy and numeracy who have the knowledge and skills to develop curriculum.

---

Although there may be common foundation skills that are needed by a range of industry and occupational areas, the way literacy and numeracy are used in the socio-material practices in each workplace can look and be very different; in-depth ethnographic research conducted both internationally and in Australia on workplace literacy and numeracy have repeatedly shown how and why this is the case\(^4\). Thus, the assumption that frontloading trainees with foundation skills and expecting that they could ‘transfer’ these skills in their individual workplaces is questionable\(^5\).

Pedagogically, the foundational skills development for each industry and occupational area would best be embedded in the relevant industry VET qualification, rather than be separated out as separate units\(^6\). While this would require VET teachers have a sound understanding of pedagogy as well as their industry, or VET and literacy/numeracy teachers working together as in the WA CAVSS model\(^7\), this should not be seen as a deterrent, given it is well known that the quality of teachers/trainers is a critical factor in quality learning\(^8\). Such an embedded approach enables the teachers/trainers working directly with the qualifications and the learners enrolled in them to identify the language, literacy and numeracy needs for the industry and the occupation the learners are qualifying for, and design and build in appropriate assessment and learning within the overall program.

It would seem more practical to embed proposed units to equip learners for future work into the set of Employability Skills which were designed as the Core Skills for work, both current and future rather than create a new category of future work skills. It is also important to ensure that what is designated as skills to deal with changing and emerging work are tangible and assessable skills, not personal attributes. Just as foundation skills need to be learnt and assessed in an industry, community or enterprise context with technical units, so do the employability or core skills for work.

It is also important to note that while the school system is focussing more on STEM as well as general capabilities, it would be wrong to assume that a good school education now will equip these students with all of the skills and knowledge they need for employment and life. The dominant discourse about contemporary work and workplaces is that the future is unknown. It would be unproductive to design a training product that includes, or presumes to include, all of the skills a person would need in work for life. The education and training system at all levels needs to be flexible enough to adapt to new knowledges, skills, and technologies, as well as


changing demographic make-up of the labour market; in this sense, the notion of a training ‘product’ or ‘package’ may be outdated and inappropriate.

A major gap in the current suite of Foundation Skills units is the lack of units to address the needs of English language learners. In this area, there are accredited units, for example in the NSW AMES Certificates in Spoken and Written English (CSWE) that are developed with sound linguistic and pedagogical foundation, and address areas that the FSK does not address. Furthermore, current discussions about foundation and employability skills are silent on the value of multilingualism, not only for employment but for active participation in society. If the VET system is to reformed with a greater future orientation, more attention is needed on harvesting the existing multilingual skills within Australian society, and encouraging more VET learners to learn an additional language. The reform agenda for the Australian VET system would benefit from a bolder social vision.

In general, the teachers and trainers in the current VET workforce do not have the skills to undertake what we have outlined above. VET in Australia has too long ignored the significance of sound pedagogical preparation for teachers and trainers in VET, arguing with little evidence that the Certificate 4 in TAE ought to be sufficient. We urge the Government to pay close attention to findings from recent research on VET teachers’ qualifications undertaken by Ruth Schubert et al. at the LH Martin Institute and by Erica Smith and her team in their ARC Linkage project. Limiting options to qualify as VET teachers and trainers to training package qualifications is a very myopic approach to (re)building a world class VET 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:

Technical units require practical focus with embedded knowledge and theory – the knowledge and theory provides learners with the background information that allows them to adjust to new situations and challenges. It is important that VET learners are not only trained and educated to be ‘job ready’ for the immediate future, but have the knowledge and theory that they continue to build as they navigate through different employment contexts. Focussing only on the technical skills for practice (horizontal knowledge) without enabling students to access the theoretical knowledge (vertical knowledge) leads to entrenching inequalities.

Literacy and numeracy require disciplinary knowledge of language and mathematics. However, the literacy and numeracy needed by adult learners are context contingent, and cannot and are not developed along a linear continuum, such as is used in the school curriculum. Assessment of literacy and numeracy must be designed and conducted in context, rather than with reference to some generic hierarchy of disciplinary knowledge.

---

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:

It is not possible to generalise about whether industry would be best served by qualifications with targeted or broader outcomes as there is significant difference in the industry areas served by clusters of qualifications. In some areas there is an obvious group of shared units that could form broader qualifications with specialist streams as the model for community service work does, but this does not apply to all industry areas.

Similarly there is no “one size fits all” approach for learners. Some learners, especially those with little formal education or a low level of foundation skills and or employability skills may benefit from a targeted outcome and ideally accredited courses or training package qualifications that can provide building blocks for learners as their confidence and skill levels increase.
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:

Foundation Skills Units should vary according to purpose. The hours associated with the FSK training package are not sufficient for literacy and numeracy development. The fact that students cannot enrol in a unit more than once does not work with FSK because if the learner is doing calculations for CIII in plumbing they can be co-enrolled in the FSK numeracy unit. However, when they go into a different unit or CV and require support they can’t enrol in the FSK unit again and there are not enough choices/units to provide ongoing assistance. FSK units are also difficult to fund and can be contingent on RTO ability to sustain a trade teacher and a LN teacher.

The rules about not being able to ‘repeat’ a foundation skills unit (without incurring a financial burden) can exacerbate existing disadvantage and barriers to access to further education and training.
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:
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:

As mentioned in our response to Theme 5, rules about ‘repeating’ common units need to be examined from the perspective of access and equity.
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:

Whilst skill sets have value in extending an individual’s capacity to meet additional or changed work demands and form part of a pathway to further learning, they should not be seen as a “quick fix” for those without a previous post school qualification. Generally skill sets may get an individual into short term work but not usually into sustainable employment; they cannot substitute for education.

Allowing students, particularly young school leavers, long term unemployed or those suffering from disadvantage to gain a qualification with foundation skills and employability skills embedded rather than complete a short skill set will ensure a better skilled workforce more able to meet changing work needs.

An area where skill sets in foundation skills is relevant is in workplace delivery. The Workplace English Language and Literacy (WELL) program provided many organisations with the ability to upskill their workforce with the relevant English language, literacy and numeracy skills; a new program like WELL is critically needed to address the ongoing workforce development needs of workers, particularly in the contemporary economy where people could be experience multiple careers during their working life.
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:

Accredited courses are useful for RTOs where training packages do not meet the needs of all learners:

- Currently there is no training package that develops English Language acquisition skills. The FSK training package is neither designed for, nor capable of, providing a structure for English language acquisition for English as an additional language students. NSWALNC strongly supports a separate suite of ESOL courses; we believe that the NSW AMES CSWE Certificates continue to be relevant and of high quality; they have been used nationally as the AMEP curricula for many years.

- Accredited courses also meet the needs of disadvantaged learners who require support to engage with VET. The FSK training package has few options for learners whose core skills at not yet achieved on the Australian Core Skills framework (nya in the ACSF, or pre-level). Accredited course serve a valuable role in providing opportunities for learners whose core skills are pre-level. NSWALNC strongly supports the development of educationally sound accredited courses for delivering basic literacy and numeracy.