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

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<th>Item</th>
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<td>2. Full name:*</td>
<td>Complete information in column to right</td>
<td>Sumit Oberoi</td>
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<td>3. State or territory:*</td>
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<td>4. Organisation name (if applicable):</td>
<td>Complete information in column to right</td>
<td>Air Conditioning and Mechanical Contractors’ Association</td>
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<td>5. Please indicate your interest in this discussion paper:*</td>
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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:

The AMCA supports the need for the development of skills that will help learners to be resilient and adaptable in the face of changes to the work environment, and the discussion paper succinctly highlights some of the main challenges facing our VET system. To strengthen the case for change, it would be helpful to see examples of training models that have had success in implementing reforms that focus on the types of foundational and future work skills proposed as part of this reform process.

In the Heating, Ventilation and Air Conditioning (HVAC) industry, individuals will be challenged to adapt to rapid changing technologies, applications and industry practices. The AMCA is optimistic that the proposed design changes can improve the capacity and capability of individuals as the proposed emphasis on foundational skills and future work skills are vital to cultivating the types of workers that will thrive in a dynamic environment.

However, some foundational skills (especially language, literacy and numeracy) should be developed prior to undertaking trade level qualifications to allow the student to maximize their learning during an apprenticeship, and to ensure that they are job-ready in-line with the needs of industry.
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:

Foundation skills and future work skills must form part of all qualifications. How these skills are captured and delivered as part of a qualification, though, should depend on the type of skill and the type of qualification in question.

For example, certain foundational skills (such as language, literacy and numeracy) should be addressed before a student undertakes an apprenticeship and may best be created as specific units of competency. Another example may be meta-learning. Such skills are under recognized but will cultivate life-long learners that are resilient and adaptable.

Capabilities such as emotional intelligence and self-awareness are inherent to all training and occupational undertakings, and therefore should be capable of observation and assessment by teachers in the VET system, as well as employers during on-the-job training.

Currently, however, teachers and employers are not focused or informed as to how to monitor these types of capabilities, therefore upskilling would be required.

Other foundational and future work skills that should be considered include: emotional intelligence, systems thinking, first principles thinking and creative thinking.
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:

It is important for technical units to provide learners with a sound grasp of fundamental knowledge areas and theory. Such learning will allow individuals to more readily apply existing knowledge to new concepts, technologies and applications; making them more resilient and adaptable to changes in the working environment.

Units focusing on technical skills could also embed foundational skills such as meta-learning and first principles thinking. Students could be required to develop their own training strategy, which might form part of their assessment requirements and encourage greater ownership of their learning outcomes.
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:

As highlighted in the Training Product Reform: Issues for Discussion paper, targeted outcomes must be “balanced against the need to ensure that learners gain the skills that allow them to adapt to future workforce changes”. This view is shared by industry who acknowledge the need for learners to be able to adapt quickly to changes in technology and industry practice.

However, the primary role of VET qualifications in trade-based industries is to ensure that students can undertake practical activities safely and to a high standard of workmanship. These objectives must not be compromised by the reforms.

Furthermore, any proposal for the broadening of vocational outcomes must ensure that occupational licensing requirements are adequately considered. This is especially important for trade-based industries where licenses are aligned to training qualifications.

An increased focus on foundational skills and future work skills, (especially those that increase capacity for lifelong learning) would go some way to developing more resilient and adaptable learners without necessarily having to broaden the vocational outcome.

The AMCA encourage government to investigate greater utilisation of pre-apprenticeships pathways for the development of foundational skills and future work skills.
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:

The mix of core units and electives should depend on the specific training package and qualification being sought, as well as local industry needs. Consistent with the industry-led principle, IRCs should be able to advise on what mix is most appropriate for a given qualification and vocational outcome, while training providers and employers should maintain some degree of flexibility to ensure that learners develop skills that meet specific needs.

Qualifications should explicitly state the types of technical, foundation and future work skills required at the conclusion of the qualification. These do not necessarily need to be underwritten by a minimum number of units, as technical units will concurrently develop certain foundational or future work skills. Furthermore, certain foundational and future work skills may be best observed and assessed as the student develops their technical skills.

To promote consistency and transparency amongst all stakeholders (learners, training providers and employers), the AMCA has sought to develop partnerships with training providers to develop training plans in line with industry needs. This has proved to be a largely effective mechanism, not only in respect to individuals, but in promoting consistency of quality in the workforce across the entire industry. This means that AMCA members have a degree of confidence when hiring new employees who have completed their training through an AMCA partner training provider.
27. Are ‘training packages’ useful for determining training needs?

28. Does the system require additional flexibility to enable different ways of grouping qualifications?

**COMMENT:**

AMCA members are responsible for the installation, retrofit, repair, service and maintenance of Heating, Ventilation and Air Conditioning (HVAC) systems. With respect to trade-disciplines, the mix of skills required to deliver these systems means that AMCA members employ individuals from across two main training packages—1) Electrotechnology, and 2) Construction, Plumbing and Services and Property Services.

The electrotechnology training package provides training pathways for Refrigeration and Air Conditioning technicians (RAC), while the Construction, Plumbing and Services and Property Services provides relevant qualifications for Mechanical Services (MS) plumbers.

As a result, the grouping of qualifications into industry areas is less clear for companies operating in the HVAC industry. While the skill sets required for each of these trades are unique, there is potential for qualification design that more adequately reflects the interconnection.

The AMCA would be interested in participating in any consultation that explores possible flexibilities that would deliver better outcomes for the Heating, Ventilation and Air Conditioning (HVAC) industry.
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 (e.g. implementation guides, companion volumes) that would overcome potential disadvantages of common units of competency and promote wider adoption?

COMMENT:

Within the building services industry, concerns have been raised about the volume of units within a training package. Reasons cited for such concerns include:

- The sheer volume of units students are being asked to complete
- Some units are out of date or no longer required
- Training providers do not have the capacity or capabilities to deliver the breadth of units
- Units are not being revised or updated frequently enough to meet the needs of industry

If common units could be designed to ensure they do not diminish safety or the technical competency of individuals undertaking a particular qualification, it may help to address some of these issues.

It is possible that trade-discipline qualifications across different training packages could draw upon common units relating to health and safety, business management, maintaining documentation and customer service; however, each unit would need to be assessed by industry to ensure there is no regression in terms of the job readiness of learners at the conclusion of their qualification.
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:

There is merit in the more effective use of skill sets—both within a qualification and as supplementary training.

From an employer’s perspective, clearer communication of skill sets within a qualification can assist with the selection of elective units at the point of taking on an apprentice. These skill sets could be selected based on the company’s specific business needs but may also be driven by regional or licensing factors (for example, HVAC operations in warmer climates emphasize cooling knowledge and skills, whereas cooler climates prioritize heating).

It could also help individuals and employers identify skill gaps so that professional development plans can be designed. For example, if an RAC technician from Queensland relocated to a cooler climate, they could undertake supplementary skill sets in heating systems that might be attractive to potential employers or align to licensing regimes in other states.

The AMCA encourages caution with respect to allowing an individual to undertake a skill set without having developed foundational and future work skills that would allow them to thrive in their chosen field. In fact, we encourage government to explore opportunities to make greater use of pre-apprenticeships so that higher-level qualifications deliver training outcomes that ensure graduates are job-ready.
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: