Submission 077 – Erica Smith
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Recommendation one

1.1. What are the important elements in a definition of amount of training in a competency based training system? What is your suggestion for a definition of ‘amount of training’?

Competency-based training does not preclude a definition of a required amount of training. Smith et al (1996) developed a model of CBT in a major government-funded evaluation study of early implementation. The essential features of CBT were found to be:

- S: Based on competency standards or formal industry consultation;
- C: Written in CBT format;
- I: Industry Involved in course monitoring;
- R: RPL procedures present.

Assessment-related features that are now seen as integral parts of CBT (‘on demand and at least partly in the workplace’) were rarely implemented. CBT was not seen as excluding prescription or expectation of amount of learning.

But as CBT has evolved over time in Australia, we are in an unfortunate situation where there are no expectations of how or how much training should be delivered. See Smith (2010) for the steps by which the system has evolved and the resulting problems.

Requirements for type and amount of training would speedily rectify many of the problems. It would also bring VET in line with other sectors of Australia education, where the ‘size’ of qualifications are well understood.

The ‘amount of learning’ definition should incorporate the following:

- Face to face training delivered by the VET teacher and/or on-line training delivered and moderated by the teacher;
- Individual learning and practice undertaken by the student, but structured by the VET teacher, and processed by reflective activities, group discussion and /or feedback from teacher/workplace supervisor;
- Time take to complete prescribed assessment tasks.

My suggestion is ‘The number of hours that students are expected to spend on learning in a qualification or unit of competency, through completing face to face, on-line or individual learning and assessment activities that are clearly prescribed and monitored by their teacher or trainer.’

Some riders would need to be attached, e.g.

- The amount of training should be readily achievable within the enrolment period, e.g. if studying full-time a qualification of 300 hours could not awarded in less than 10 weeks, etc.
- In work placements, the entire time spent working cannot be seen as contributing to an ‘amount of training’. An apprentice-model rule of thumb could be used, i.e. 20% of the work placement would be an ‘amount of training’.
- I would advocate a prescribed proportion of hours which need to be spent on face to face or moderated (perhaps even synchronous) on-line activities.
1.2. Where in the regulatory framework would this definition best sit to improve student outcomes?

This would be a major change and I don’t think it’s possible at this stage to predict where that might be.

1.3. If an amount of training is defined, how can industry ensure that innovation and flexibility in delivery of training is retained? What criteria could be used to ensure the RTO has the scope in which to justify its rationale for shorter course duration?

I don’t see that prescribing the amount of training reduces flexibility. Even if you add factors such as prescribed proportion of time to be spent face to face it is not too limiting. I think we often think too much about what ‘industry’ might think and make incorrect assumptions about this. In my extensive research experience, most real industry clients value proper training, and any employer who complained about inflexibility related to amount of training should be encouraged to utilise non-accredited training instead. The employer can always use units of competency as a guide to underpin such training. Offering that employer sub-standard qualifications for its workers doesn’t really help anyone.

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?

Credit transfer relates to units of competency gained at another RTO, and after an appropriate grandfather period, credit transfer should not be given for any units for which the required appropriate amount of learning could not be demonstrated. RPL should depend on demonstration of an appropriate amount of learning having taken place as well as on the learner demonstrating skills and knowledge. If teachers were sufficiently educated and skilled it would not be difficult to devise RPL assessment tasks which covered this aspect of prior learning (after all, RPL is recognition of prior learning not a competency test alone). I would also advise that no training provider should be allowed to issue a qualification unless that RTO had taught and assessed a prescribed proportion of the qualification. In higher education the normal limit of allowable inward credit for a qualification is between a half and two-thirds of the qualification. The higher levels of credit (i.e. two-thirds) are normally only awarded for articulation agreements that are scrutinised by Academic Boards; e.g. two years of a degree for a student holding a particular Advanced Diploma, often narrowed to a particular provider. I don’t see transition for existing students as a major issue. In my view students should complete the version of the qualification in which they enrolled. No training course can be entirely up to the minute, and so transition may not be necessary.

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?

While it might seem sensible to imagine a ‘new learner’ who would have to complete an entire course while other learners might not need all the learning activities, in practice I do not think that this concept is really helpful. Who can tell what prior knowledge and experience any learner brings to a program? And substantial cognate learning we can always be assessed via RPL. However, from a
teaching/training point of view, learners with more knowledge and skills contribute to others’ learning, and moreover, rarely fail to learn new knowledge or skills themselves.

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

My definition aligns pretty closely with the AQF. The AQF is in any case something of a political construct, especially around Certificate III qualifications, as I know from having been involved in several of the consultation workshops when the AQF was being re-developed. I don’t think we should be worrying about the AQF but should focus on getting the VET sector right.

Recommendation two

2.1. How well are industry reference committees (IRCs) equipped to provide technical expertise on course delivery arrangements to be able to determine an appropriate amount of training? Who is best placed to provide the technical expertise to IRCs to assist in determining an appropriate amount of training? How do RTOs provide input given they are largely excluded from IRC participation?

As is stated on p. 13 of the discussion paper, IRCs are voluntary committees (I am a member of the Education IRC). They are not well-placed to do this work. Although some members of IRCs are familiar with the VET system they are not generally educators. Understanding of curriculum development is under-developed in the VET system currently due to the de-skilling of the VET workforce over the past two decades. (See my recently-concluded ARC-funded project on VET teachers and their qualifications http://federation.edu.au/research-vet-quality ) In other countries, government departments contain people expert in this area. My suggestion is that a committee of appropriately qualified and experienced senior teachers from public and private RTOs from the relevant industry areas should be set up for each qualification to work on this, and also to offer advice to the IRC on content - and vice versa. These committees should report to a body which has an identified and expert contact person within DET. The committee should not contain RTO managers, as they could be tempted to suggest shorter and less rigorous delivery, as pointed out in the discussion paper.

More generally, the current system of Training Package development is flawed. A more rigorous approach should be taken perhaps modelled somewhat on the DACUM method. In a recent ARC-funded project (Smith, Junor, Hampson & Smith) we developed a system to identify skills within an occupation which involved actual field research as well as expert consultations. (See Smith et al, 2015, with how some of these occupational studies compared with the relevant Training Package qualifications) A final stakeholder validation elicited the comment that our system was more rigorous than the system for Training Package development. In my view some time needs to be devoted to thinking about how we can improve the system Australia has for developing qualifications.


2.2. ASQA has identified a range of factors that increase the risk for unduly short courses. Do you agree with these factors? Are there any other factors that should/could be considered in the context of unduly short courses?
I agree with these risk factors but would not accept that any new system should be confined to so-called high risk courses. Every course should be taught and assessed properly. Otherwise we are implying that some qualifications are not very important. If we get the system for curriculum right, then it should work for every course, whatever the risk level.

2.3. What other sectors, other than those identified by ASQA, would benefit from this risk based approach to training package development? How did you identify these sectors (for example, what factors regarding this sector were relevant in making this opinion/decision?) See above. All sectors should be treated equally.

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?

Reforms to VET student loans, tightening up by state regulators, and proposed changes to Training Packages all help. But none of these would substitute for fixing the short-courses problem. An additional (not substitutable) method of addressing the problem would be to audit on teaching/training quality not just assessments. Ofsted in England adults teaching quality in the FE sector.

Recommendation three
3.1. What impact and costs would a provider face in implementing ASQA’s proposal of a Product Disclosure Statement (PDS)?

Firstly, The PDS definitely needs a better name. Education is not an insurance policy! RTOs should need to develop their own Training and Assessment Description (‘TAD’) for each qualification (or is one for each unit proposed? It doesn’t explain).

As I was unable to attend the consultation I am not sure if I have understood what a PDS is supposed to be. So I have proceeded on how I think it could be usefully done. I think it is a great idea in principle.

The Department should definitely provide for RTO web sites the nationally agreed ‘amount of learning’ and also the recommended mode of delivery. The RTO should be required to post its own TAD as well, so that prospective students can see how the two compare. The TAD could cover a limited range of alternative delivery/assessment modes (Say up to three) and students should be told for which they are enrolling. RTOs should be required to have Academic Boards (maybe with a different name), as do universities, to discuss and approved proposed curriculum and broad assessment strategies. Some RTOs already do this. The size and nature of the Academic Board can be proportionate to the size of RTO. Minutes should be kept of discussions at these meetings. The Academic Board could also oversee assessment results, which would improve quality of assessment. The beauty of an Academic Board is that people outside the discipline/industry area would be inspecting curriculum methods and assessment results, so that bad practices are exposed and cannot continue.

3.2. What impact would a PDS on the flexibility of RTOs to deliver training? None, unless they want the flexibility to deliver really dodgy training.

3.3. How could a PDS take into consideration the various flexible and innovative ways in which a single training product may be undertaken? See my response to 3.1

3.4. What would trigger an RTO to update each PDS?
Anything outside the range of delivery modes listed in the 'PDS' or "TAD' as I prefer to call it would require an update.

Of course, a Training Package change would trigger a complete or partial renewal

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?

If my 3.1 suggestions were adopted, students should be told at point of application which of the (say) three modes would be offered that time to that group of learners.