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’?

The Amenity Horticulture, Landscaping, Conservation and Land Management Industry Reference Committee is concerned about the extent of poor quality delivery in the VET sector. It seems that too many providers are reducing their delivery hours to save money at the expense of quality education. The IRC believes that defining the ‘amount of training’ may be helpful in some instances for deterring poor practice and better informing learners about training demands. However, the IRC would recommend that the ‘amount of training’ defined should be considered indicative, as a guide for regulators to measure against, rather than as a set requirement to be used for delivery in all circumstances.

Defining ‘amount of training’ within a competency-based training system is problematic because there is huge variation between VET learners. Competency-based training operates on the principle that the knowledge and skills required for competency can be acquired by any means. Competency must be demonstrated, it is not acquired through ‘time-served’ mechanisms. CBT recognises that the acquisition of knowledge and skill will not take the same amount of time for everyone. For this reason, units of competency specify requirements around assessment, but not training delivery.

An ‘amount of training’ defined at unit level may reduce the ability of RTOs to provide quality training programs. Many courses in amenity horticulture, landscaping and conservation and land management draw on holistic and integrated design approaches that combine learning for a number of subjects, e.g. a field trip may address learning elements from five different subjects. Rigid approaches to measuring ‘amount of training’ may make valuable, contextualised approaches to learning less feasible for RTOs. However, some IRC members argue that standardised national curriculum with limited flexibility would be an effective mechanism for ensuring national consistency.

The IRC contends that training duration does not necessarily equate to quality and that many other factors are in play. Significant among these is the role that funding models play. Current outcomes-based funding approaches give RTOs an incentive to complete the training process in the shortest amount of time. Additionally, open market policies (that do not cap the supply of training) drive RTOs to compete for as many learners as they can enrol, and training duration is a key component of marketing.

In this environment, strong regulation is required to ensure that RTOs are delivering the quality expected by users of the system – learners and employers. Quality assessment is central to the effective operation of competency-based training system. The IRC contends that a clear definition of ‘supervised assessment’ would be valuable for establishing and enforcing sound assessment practices that produce valid and reliable assessment outcomes.

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

The Amenity Horticulture, Landscaping, Conservation and Land Management Industry Reference Committee is concerned by the impact that increasing compliance requirements are having on good training providers. Ensuring RTO compliance with a defined ‘amount of training’, or providing justifications for deviations from the defined amount, will introduce another level of complexity to RTO practice that diverts resources from the provision of quality training and assessment.

For courses that are delivered in a formulaic and consistent way to large cohorts of homogenous learners, the increase in workload may be marginal. But for courses that are delivered to niche learner cohorts in individualised and creative ways, e.g. Certificate IV in Permaculture, or Conservation and Land Management, or the Diploma in Organic Farming, the imposition of a required ‘amount of training’ will be a significant burden. Requirements that dictate too rigidly how much and what type of training must be provided will prevent RTOs from implementing integrated, student-centred learning. However, some IRC members warn that the quality of training delivery must be maintained across all industry areas so that the value of VET outcomes is not eroded. The needs of niche areas of delivery should not be allowed to drive training practices at the expense of more mainstream programs.

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?

The Amenity Horticulture, Landscaping, Conservation and Land Management Industry Reference Committee recognise that many VET learners bring a wealth of experience and background knowledge to the training programs. Any defined ‘amount of learning’ would need to take account of the pre-existing knowledge and skills for some learners and learner cohorts. A lot of higher education graduates access vocational training in amenity horticulture, landscaping, conservation and land management to build their practical skills and experience. This is one example of a learner cohort that would require the ability to deviate from set ‘amount of training’ requirements.

The IRC believes that ‘amount of learning’ would be best expressed as a broad range that accommodates learners who may be fresh out of school as well as those with previous work experience, and those with knowledge developed through higher education or other study. Such a range may also be helpful for RTOs and trainers to provide them with an indication of the size of the unit and the amount of learning that may be required. Nominal hours have served this purpose in the past, but these are not used uniformly across all jurisdictions.

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?

The Amenity Horticulture, Landscaping, Conservation and Land Management Industry Reference Committee proposes that learners may be differentiated according to whether they have no industry knowledge, limited exposure or have worked in the field.

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)?

**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?

The Amenity Horticulture, Landscaping, Conservation and Land Management Industry Reference Committee would need to source outside expertise if there was a requirement to establish an ‘amount of training’ for training products. In setting the ‘amount of training’ the IRC would seek to understand the range of learner cohorts and training approaches employed for the relevant training product in an effort to ensure that a defined ‘amount of training’ does not restrict the flexible use of the product. The IRC predicts that is would be challenging to reach an agreement on the ‘amount of training’ that satisfies stakeholders across all industry sectors, jurisdictions, learner cohorts and provider types.

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?

The Amenity Horticulture, Landscaping, Conservation and Land Management Industry Reference Committee understands that some factors increase the risk of poor quality training and assessment. The ASQA report identified these factors as:

- High enrolment numbers
- Growth industries
- Offered to disadvantaged learners
- Required for jobs with vulnerable clients and/or with implications for community and workplace health and safety
- Where qualifications are a ticket to work.

The IRC recognises that these factors are evident in courses where problems have been experienced in the amenity horticulture, landscaping, conservation and land management industries. An additional risk factor that has been noted, particularly in conservation and land management, is a lack of quality trainers and assessors. The quality of outcomes from training programs in this growth industry has been problematic in some states. Inexperienced and inadequately qualified trainers and assessors have been identified as a concern due to a tendency for skills and knowledge to be transferred from related horticulture and landscaping fields without genuine experience in conservation and land management contexts. IRC members contend that the industry currency of trainers and assessors has not been subject to enough scrutiny. In the view of the IRC, industry memberships and attendance at conferences and trade events do not constitute satisfactory evidence of the maintenance of industry currency.

Constant change in regulatory requirements, e.g. WorkSafe requirements that are increasing regularly, challenges the capacity of the VET system to provide training that meets industry requirements. Regulatory change can result in gaps in the training package, depending on how
prescriptively units of competency are written, and gaps in the capability of trainers and assessors. Inconsistency of licensing across states is also an issue for the landscaping industry that impacts on the quality of training outcomes.

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?)

An example relevant to the Amenity Horticulture, Landscaping and Conservation and Land Management industries is the Chemical Users’ License, or Agricultural Chemical User Permit (ACUP). Chemical Accreditation is an AQF level 3 training and accreditation program that is designed for people who use agricultural and/or veterinary chemicals. Training is linked to two units of competency:

- AHCHHM303 – Prepare and apply chemicals
- AHCHHM304 – Transport and store chemicals

The course covers the transport and handling of chemicals and is provided to new learners and as a recertification to previous license holders. There are significant variations in the duration and delivery method for this course and it has been the subject of complaints to ASQA due to the existence of ‘tick-and-flick’ providers delivering the course 100% online. Some online courses can be completed in as little as 4 hours by watching videos, compared with approximately 17 hours in a TAFE program, although IRC members note that duration is not a guarantee of quality delivery.

For previous license holders requiring only a ‘refresher’, short duration and online delivery may be suitable. However, the IRC believes that introductory courses for new learners need to be treated differently and may be an area where set minimum training hours may be appropriate.

Effective regulation of RTO compliance with the training package assessment requirements is also essential. Under the current training package design rules, it would be possible to strengthen the assessment requirements to specify a requirement for practical, real-time assessment, rather than online or via recording. Currently the Assessment Requirements for AHCHHM303 Prepare and apply chemicals state: Competency is to be assessed in the workplace OR simulated environment that accurately reflects performance in a real workplace setting. More rigorous enforcement of this condition through auditing may help to reduce the poor practice of some RTOs.

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?

The Amenity Horticulture, Landscaping, Conservation and Land Management Industry Reference Committee notes that the current design of training packages enables the inclusion of detailed assessment requirements. These can be used to provide specific instruction around how competency must be demonstrated and can include requirements for work placement, equipment use, and the number of times and conditions under which competency must be demonstrated.

The IRC acknowledges that moves toward common units of competency may make it more difficult to include detailed assessment requirements that will be relevant to all the industry sectors that may use a unit of competency, e.g. requirements around equipment use may need to be less specific, which may then give RTOs liberty to train on equipment that is not directly relevant to industry.

The IRC contends that greater focus on trainer and assessor competencies and continual professional development would be beneficial for improving the quality of training and assessment
outcomes. Industry peak bodies could play a role in establishing and verifying the competency of on-the-job assessors. Regulatory audits should also focus on ensuring that trainers and assessors are suitably qualified and current in their industry knowledge.

**Recommendation three**

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

The Amenity Horticulture, Landscaping, Conservation and Land Management Industry Reference Committee acknowledges the merits of providing consumers with information that will allow them to make informed decisions about VET offerings. However, the introduction of Product Disclosure Statements will significantly increase RTO workload. Although they may act as a deterrent to the small number of poor performing RTOs, prescriptive administrative requirements will also burden RTOs that are already providing a quality service without necessarily resulting in improved student outcomes.

The IRC believes that RTO guidelines for the provision of consumer information would be more workable and would allow RTOs to publish information in a way that is most useful for their learners. The IRC suggests that if Product Disclosure Statements are introduced, assistance should be made available to RTOs to help them with the initial workload involved in formulating these documents.

3.2. What impact would a PDS on the flexibility of RTOs to deliver training?

The Amenity Horticulture, Landscaping, Conservation and Land Management Industry Reference Committee is concerned about the RTO workload inherent in introducing Product Disclosure Statements. Product Disclosure Statements that are written too vaguely will not provide consumers with the type of information that is intended through the introduction of the requirement, but if the statements are too specific RTOs will lose the flexibility to adjust courses to suit the needs of individual learners and enterprises, or to take advantage of new learning opportunities as they arise. The result is likely to be training provision that is more conservative, less contextualised and less innovative to the detriment to all users of the VET system.

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

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

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?

The Amenity Horticulture, Landscaping, Conservation and Land Management Industry Reference Committee values RTO communication with potential learners about course requirements and expectations. RTOs should encourage potential students to talk to employers and training providers about vocational training so that they fully understand the training product and are sure they’re making the right choice. While Product Disclosure Statements could help consumers to ‘compare apples with apples’, their implementation would create considerable work for RTOs and may not deliver the level of consumer awareness that is envisaged. Guidelines and support resources that would help RTOs to provide appropriate information to consumers may be more useful and workable.