



NSWALC Submission Volume 1

AgriFood Skills Australia Training Packages and Equity

Senate Inquiry into Industry Skills Councils



AgriFood Training Packages and Equity

Executive Summary

The scale and volume of the Equity issues involving AgriFood Skills Australia and Training Packages are extraordinary. The performance of AgriFood in Equity terms in discharging its due diligence responsibilities, consultation requirements and Training Package development portrays a picture of arrogance and a lack of accountability to stakeholders and government. AgriFood Skills Australia has failed to meet the requirements for Equity considerations in the review and development of national Training Packages.

Acceptance of the recently proposed merged AgriFood training package AHC10 will be perpetuating a structural disconnection with the only existing core Indigenous Training Package. Permanent disengagement of key stakeholders through construction of whole-of-life barriers to training and employment will be the result. Permanent damage to the VET quality system will be the liability. This demonstrates a level of incompetence by the AHC10 Training Package project management.

There are extensive and long term Equity issues outstanding in the proposed AHC10 training Package and continuing Equity issues within the processes and methodologies used by AgriFood Skills Australia in the maintenance and development of Training Package products. An understanding of and commitment to equity is not demonstrated in the selection and structure of Review Committees and Steering Committees, as well as the staff, management and board of AgriFood Skills Australia. Therefore the AHC10 Training Package has not met the basic core requirements for endorsement as outlined in the National Quality Council Policy for the Training Package Development and Endorsement Process.

Numerous AgriFood activities are not undertaken in a transparent and accountable manner and there appears to be insufficient governance arrangements in place, zero penalties for non compliance, and no existing mechanism to enforce compliance with performance KPIs or amend funding as a direct result of non compliance.

Three questions will highlight several issues:

Why does an Industry Skills Council as a peak VET organisation have less stringent audit requirements and less compliance enforcement mechanisms than the smallest RTO in the VET sector?

Why does an Industry Skills Council have lower evidentiary requirements for an Equity audit than a Certificate II learner has for a practical assessment?

Why are there no existing arrangements for the withholding of contractual funds for a non performing ISC, and why are there no existing arrangements for the cancellation of funds for specific contractual clauses that do not meet the KPIs agreed under contract with the controlling authority?

Recommendations

The recommendations are that:

- The AHC10 Training Package is not endorsed by the National Quality Council (NQC).
- The NQC independently review the design, consultation and development processes of the AHC10 Training Package.
- Best practice models of consultation are to be streamlined across ISCs as a formal process.
- Best practice models be implemented for Equity group representation on all committees directing the design, consultation, review and development processes of Training Packages.
- The Equity Auditor report is to be a comprehensive audit requiring documented evidence of compliance against a detailed set of rigorous Equity guidelines built into the Equity Report Template.
- The Equity Auditor is to have the forensic power to investigate issues of non compliance, evaluate the quality of evidence provided and specify remedial action required.
- An Equity Auditor should have formal auditing qualifications enabling a rigorous assessment of the quality of the processes of an Industry Skills Council.
- Quality and Equity Auditor to be prohibited from entering into contractual arrangements with Industry Skills Councils and to remain wholly independent from commercial considerations with Industry Skills Councils in relation to Quality Assurance processes related to Training Packages.
- The Quality and Equity Auditor contracts be funded through a levy enacted by the NQC.
- Corporate governance requirements be instituted for Industry Skills Councils related to the management of Training Package development process, benchmarks for consultation processes and relative financial expenditure including staffing requirements.
- The NQC adopt a risk management approach to the auditing of Industry Skills Councils in relation to performance of ISCs.

AHC10 Equity Issues:

The existing and emerging job roles of Indigenous workers have not been analysed properly or appropriately within the time frame of the existence of the AQF. Even the most common job roles and work outcomes have not been described in sufficient detail to enable translation into AQF qualifications and units of competency. The Indigenous competencies have not undergone a functional analysis and have not been written as national standards for industry and community performance. Little or no analysis and development work on Indigenous job roles has been undertaken within the precise functional role of the Training Package.

It is not possible to assess the full extent of the Equity issues facing this Training Package when the basic structural work has not been attempted and has not been done over the last six years of custodianship by AgriFood. A new approach is required.

Diversity

To ensure Training Packages cater for the full diversity of Australia's workforce and enhance opportunities and outcomes for all people, access to and participation in training and assessment must be bias-free. **Training Package Developer's Handbook (TPDH), DEEWR.**

There is no evidence that ASA have developed endorsed product that is bias-free. There is a range of evidence that points to ASA endorsed products being limiting in catering for diversity, not supporting equitable participation and even actively suppressing attempts to cater for diversity.

Training Packages should be accessible to all potential students. However, there are some whose access to opportunities for training and employment in the past may have been limited, and it is important to ensure that barriers are removed for people from those client groups. In particular these include:

- Indigenous Australians
- people with a disability
- women, particularly in 'non-traditional' industry areas
- people living in rural or remote locations.

Training Package Developer's Handbook (TPDH), DEEWR.

The AHC10 Training Package contains barriers for access to opportunities for those who may have had limitations to training and employment. Little has changed in the proposed AHC10 package from the previously separated training packages.

Cultural bias

There are no specific units on cultural diversity in the proposed AHC10 training package despite specific feedback on this area and despite their ready availability in several other Training Packages.

Cultural issues: provision is made in some places for sensitivity to cultural issues with indigenous Australians, which is obviously extremely important. However, there are cultural issues with other people in Australia. The poultry industry employs many people from a non-English speaking background and there are many cultural issues which need to be addressed. Can this be incorporated into the new training package in the form of a new unit?

May 6, 2009, Feedback on the First Draft of AHC09, Poultry CRC.

Net result: There has been no development of product on cultural diversity within the endorsed products of qualifications and units of competency.

Disability bias

There has been no work done on the equity group of people with a disability within the endorsed products of qualifications and units of competency.

Net result: The proposed merged package has not addressed nor incorporated opportunities for inclusion of people with disabilities in access to or participation in nationally recognised training.

Proper and adequate consultation methods have been replaced by a methodology of fixing a problem only when a strong complaint is made. Numerous decisions to delete and amend products have been reversed due to severe and precise criticism from draft proposals of the merged package products. Multiple reversal decisions have not been uncommon.

Failure to consult has been hidden beneath layers of hastily applied band-aid applications across the relevant products of all industry sectors.

I notice there is no longer a Certificate I in Conservation and Land Management? This is one of our most popular qualifications delivered to equity groups in Juvenile Justice Centres, Correctional Centres, Disability Services, Aboriginal clients, and long term unemployed. I believe this entry level qualification is necessary for our target groups. Andrea Cingi CEO Tuggerah Lakes Community College May 2009, Feedback on the First Draft of AHC09

Net result: The Certificate I in CLM that had been removed from the training package without consultation was reinstated with the flick of a pen. Certificate I in Horticulture and Agriculture currently remain out of the proposed training package.

There is little or no evidence of analysis and incorporation into the proposed training package with respect to anti-discrimination legislation, disability discrimination legislation, disability standards for education and associated standards and regulations.

Indigenous bias

A range of issues have been identified.

1. Lack of review action

The units of competency in the RTD02 Conservation and Land Management Training Package (CLM) relating to Indigenous Land Management (ILM) have not been reviewed for appropriateness nor developed since the endorsement of RTD02 in 2002, nor since the reviews of 2005 and 2006 despite specific feedback on this issue. The units of competency at all AQF levels are grossly inadequate in meeting current needs.

There is a real need to rewrite AHCILM301A Proposed appropriate uses of traditional customs. It is not clear from reading the performance criteria what is supposed to be taught in this unit. The performance criteria is not clear, some statements don't actually make sense, and it is very difficult to understand the learning outcome intended.

This unit needs to be rewritten from scratch with a sound understanding of the intended learning outcome. I am looking forward to seeing the additional guidance information for this unit.

Unknown contributor, ASA Feedback item AHC10 Stakeholder Feedback Report Nov 2009

No action was taken to develop or improve this unit, nor any other Indigenous Land Management unit in AHC10. All ILM units currently remain in their original state of the 2002 CLM versions. After 7 years no review work was done, no changes were made and no improvements were attempted.

The proposed qualifications in Indigenous Land Management are essentially unchanged from 2002. This is bias through inaction.

2. Consultation techniques:

The methods of consultation used for AHC10 have not been appropriate for Indigenous needs.

- Email notifications requesting feedback do not by themselves constitute adequate consultation. The proof of consultation is in documented dialogues available as a formal record. These records of adequate consultation do not exist.
- Written survey techniques do not provide for an appropriate level of LLN skills for the range of stakeholder diversity.
- Web site publications, email press releases and Project Alerts, presume internet connectivity and inclusion on the ISC database, and ignore the effectiveness of locally established networks.
- Representation on Review committees, Steering committees and Standing committees has not included Indigenous people, organisations or viewpoints to any acceptable level.
- Indigenous related project findings have not been incorporated into training package development.
- National workshops, meetings and conferences have not included invitations to Indigenous groups and organisations.
- Indigenous participation levels in the training package process are non-existent and/or not evident.

All of the VET sector key policies and frameworks clearly state the need for inclusive practices of direct involvement and determination by the Indigenous peoples and communities. This has not occurred.

Overarching comments: Effective communication and consultation depends on good relationships and networks which have taken years to build and require significant maintenance. This is particularly important in dealing with Indigenous clients (“Fly in - Fly out” consultation and communication is viewed as poor practice). Consultation, industry intelligence and training promotion is best done by “locals” with established industry and community networks and relationships. RESPONSE 44 Primary Industries Training Advisory Council (NT) Inc May/April, 2008, in response to the discussion document “Skilling Australia for the Future”.

The introduction of best practice models of consultation are specifically recommended for this Industry Skills Council. Also recommended are the introduction of formal auditing of consultation processes, by an independent and registered company engaged by the NQC, and not directly involved in contractual arrangements with an Industry Skills Council.

3. **Indigenous cultural heritage:**

The traditional job roles and customary practices, as well as the modern practices and job roles, of Indigenous workers have not been described. The cultural components of work skills and community outcomes have not been analysed, developed and incorporated into Training Package product as the national baseline of Indigenous competencies. The work has not been done.

For Indigenous Australians, vocational education and training participation should be understood in the broader context of self-determination, community building and economic independence, as well as an important pathway to employment. In working with Indigenous peoples these broader objectives should be considered. Research shows that higher quality outcomes for Indigenous learners participating in VET are achieved when training resources and practices are informed by Aboriginal and Torres Strait Islander cultural perspectives, knowledge and practices. *Training Package Development Handbook, DEEWR*

No action has been taken to review or improve the cultural heritage components of the Indigenous Land Management qualifications and units of competency in AHC10 despite the formal national review mechanisms that were undertaken.

4. **LLN:**

We work with a lot of indigenous communities, and perform a large amount of our training out at these communities. One of the major obstacles that we face is that students struggle with literacy and numeracy. Traditionally we have overcome this problem by enrolling students in a Cert 1 course and then bolstering it with appropriate short course units. This enables the students to develop important/essential skills and then decide on an appropriate avenue for their future training.

Additionally we have had quite a bit of success with another cert 1 aquaculture program that we use in the remote high schools. In some communities this program has actually seen an increase in student attendance, and has empowered students to take charge of their future direction. The program

articulates well with the high school curriculum and this year could see close (to) 60 students enrolled in it.

Jeff Cooper Aquaculture Team Leader TAFEWA Kimberley

There has been no organised development of LLN within the AHC10 Training Package.

5. Indigenous horticultural heritage:

The small things matter. Plant names in Australia are titled by a number of conventions. Botanical names are for scientific, educational and technical use. Common names are in common language use. Both of these naming conventions are in use in the merged training package. Indigenous names have not been considered for general inclusion but are part of everyday usage by indigenous people in land use and maintenance. There are no references to Indigenous plant names in the mainstream training package materials of horticulture units. Indigenous names are referred to in only one Indigenous unit of competency and this unit makes no reference to botanical names.

Girringun Aboriginal Corporation uses information from Aunty Bessie Jerry, a Girramay Elder, for their ethnobotanical database. The database lists: family, scientific name, common name, Aboriginal language name where known in up to five dialects, traditional use, and calendar information.

<http://www.girringun.com.au/projects/cultural-heritage/cultural-heritage>

6. Indigenous and Remote Area bias

There have been a number of communications and other issues with AFISC such as:

- Inconsistent communications and lack of compliance with AFISC communication plans
- Inadequate consultation processes. For example, AFISC relies on industry accessing their website as a major consultation mechanism, which is not appropriate for many of our industries. Internet accessibility is often not available in the NT.

RESPONSE 44 Primary Industries Training Advisory Council (NT) Inc May/April, 2008, in response to the discussion document "Skilling Australia for the Future".

Gender bias:

There have been no gender equity groups consulted in the development of AHC10. Women in VET organisations were not included in consultation processes. The voice of women has not been heard in the development and review of the training package to an acceptable level.

Example: The proposed Landscape Construction Certificate III has been designed with a strict focus on 'hard' construction units and the plant and the design units that provide the work outcomes for women in the landscape industry have been removed despite specific feedback highlighting this major flaw.

There is a need to revise the current landscape qualifications to develop a more horticultural based approach to landscaping rather than the current emphasis on hard landscaping. Greater emphasis on 'soft' landscaping skills as opposed to 'hard' landscaping skills. May 2009, Feedback on the First Draft

I personally feel that there is no room left for woman students in the new Landscape study as it is all construction related and left no plants knowledge to implement..... Shelly Bengiat, Principal/CEO Envirotech Institute of Education February 04, 2010

The impacts of these decisions have not been addressed at all. One impact is a perpetuation of male dominance with exclusivity of 'hard' landscaping skills as represented in the trade qualification. This represents a structural barrier to those interested in the design and horticultural skills in landscaping by providing a focus on construction skills.

Instead of welcoming opportunities to enhance access to, and increase participation in, training aligned with the endorsed products, ASA are deliberately and consciously constructing barriers for women within the merged Training Package by appeasing sectional interest groups from male dominated industry associations.

Relevant Legislation

In endorsing Training Packages, Training Package developers and the National Quality Council (NQC) must meet their obligations under Commonwealth anti-discrimination legislation and associated standards and regulations.

There is little or no evidence of analysis and consistent incorporation into the AHC10 training package of specific legislation relevant to the precise job roles and units of competency. No attempt has been made to maintain currency of legislative or regulatory requirements despite awareness of extensive changes in the national, state and local jurisdictions.

VET Sector Policies on Access, Diversity and Inclusivity

Training Package developers must comply with key VET sector policies to ensure Training Packages reflect the diversity of Australia's VET clients and Australia's current and future workforce.

There is no evidence that ASA are aware of and have supported the following key policies and frameworks:

Shaping our Future – Australia's National Strategy for vocational education and training 2004 – 2010
Partners in a Learning Culture National Strategy and Blueprint for Implementation.
Bridging Pathways National Strategy and Blueprint for Implementation

There is a growing body of evidence which demonstrates that ASA have not complied with these key VET policies.

General consultation methodology

Stakeholders are denied the opportunity to gain access to an effective response and denied the capacity for effective participation in the feedback process. The lack of transparency of stakeholder feedback and lack of publication of AgriFood responses to feedback have proved an effective barrier to knowing that appropriate consultation has taken place and ensuring that appropriate actions have been taken..

ASA firmly believe that posting information on a web site or sending an email notification is a sufficient and effective consultation process. The only effective aspect of this methodology is the cost effectiveness for AgriFood.

'No response' is taken as complete approval from all stakeholders; agreeable individual responses are viewed as overall acceptance from all key stakeholders; and critical responses are addressed inadequately or ignored completely. In an action of outright contempt for stakeholder views, all organisations offering criticisms are still listed in stakeholder consultation lists as groups who have been consulted effectively. Few responses are incorporated into the mainstream training package development. The 'Continuous Improvement' program is being used as the receptacle for any unwanted criticism including any proposals and feedback deemed too hard to address.

AgriFood have reduced the entire spectrum of training package development, validation and research processes into a 'Consultation by Press Release' mentality, and they have deliberately chosen this lazy and ineffective method, because of its broad coverage with the effortless click of a 'Send email' button.

General levels of satisfaction with AgriFood consultation mechanisms are at an all time low. Specific industry dissatisfaction is at an all time high and AgriFood have shown a consistency for cultivating stakeholder dissatisfaction

AgriFood are repeat offenders where appropriate consultation mechanisms and follow up actions are required:

2007

The interface with the Agri-Food Industry Skills Council (AFISC) since it was created has not been productive. It would appear that since its inception and the closure of the National Food Industry Training Council (NFITC) little has been achieved. The CMA questions the relevance of the AFISC noting little achievement and effective leadership in skilling the general workforce continues to remain an issue. Considerable resources have been expended in attending meetings and responding to requests from the Council with no tangible benefit.

Confectionery Manufacturers of Australasia Limited - Inquiry into Food Regulation in Victoria, March 2007

2008

There have been a number of communications and other issues with AFISC such as:

- Inconsistent communications and lack of compliance with AFISC communication plans
- Inadequate consultation processes. For example, AFISC relies on industry accessing their website as a major consultation mechanism, which is not appropriate for many of our industries. Internet accessibility is often not available in the NT.
- Lack of transparency and corporate governance issues such as unavailability or inaccurate minutes (particularly for the Standing Committees)
- Lack of response to letters, emails, faxes and phone calls (documented examples available)
- Perceived lack of identifiable outcomes.

It would seem that if AFISC utilized the State bodies and their networks more effectively many of these issues would be resolved. It needs to be recognised, that although many ITAB networks still exist across the AFISC sectors, they are not resourced to act as consultation conduits, data collection or dissemination networks and in many cases do work on industries' and AFISC behalf unfunded.

Clearly, it would seem that if AFISC took a similar approach to ForestWorks, many current issues with AFISC would be resolved.

RESPONSE 44 Primary Industries Training Advisory Council (NT) Inc May/April, 2008, in response to the discussion document "Skilling Australia for the Future".

2009

Rather than provide detailed feedback on the errors and omissions in each unit of competency, in most cases more general comments are provided. We are sure that all errors and omissions can be addressed simply by using the content from the current units of competency that were agreed to by those industry organisations and jurisdictions with a role in emergency animal disease or plant pest incursion responses. Animal Health Australia and Plant Health Australia submission AHC10 Key Stakeholder Feedback Report Nov 2009

2010

AgriFood Skills Australia state that "all feedback has been considered and appropriate action has been taken to ensure all stakeholder concerns have been addressed". This is not 100% correct from our industry side of things, however there have been significant and positive changes to the draft qualifications as were presented to us some years ago - most of these changes occurring only in the past 6 months. The amount of time, money and resources the industry has invested into the review of this new training package has been enormous. We are rightfully anxious about achieving an acceptable outcome. Industry Educators Update, Nursery & Garden Industry Australia, May 2010

2010

AgriFood Skills Australia has not been responsive to the diverse needs, interests and circumstances of different Indigenous people and communities in terms of researching, identifying and developing improvements and expansion of the units of competencies for inclusion in training packages under their management in respect to the needs of Indigenous industries and communities. This situation has produced an environment which offers sub-standard, poorly contextualized VET training options for

Instead of being a pivotal organisation for productive work outcomes, AgriFood Skills Australia are the weak link in the chain for workforce productivity. The methodologies and mechanisms for consultation have consistently failed to incorporate industry and stakeholder feedback into Training Package product development.

There are three conclusions that resonate from these responses:

- * **Lack of timely actions**
- * **Lack of appropriate or accurate responses**
- * **Lack of accountability**

Stakeholder disengagement

Stakeholder disengagement is at peak levels. Numerous industry bodies including ITABs are prepared to allow the sub-standard package through because they are emotionally drained after five years of negotiations and physically cannot contribute further resources to fight the battle against an intractable and non-compliant opponent. They are simply worn out.

This is tantamount to a failure of the VET Quality system by degradation and attrition.

Equity Consultation

In general terms ASA have failed to consult any equity groups adequately, if at all, and failed to consider and develop a range of strategies to ensure the merged Training Package is accessible to all clients on an equitable basis, or support and encourage the participation of all clients in nationally recognised training.

Analysis of the consultation groups for the four training packages (the 3 original and the new merged package) reveals little if any specific equity group consultation.

Indigenous Consultation

With whom did AgriFood actually consult on Indigenous Land management?

Research shows that higher quality outcomes for Indigenous learners participating in VET are achieved when training resources and practices are informed by Aboriginal and Torres Strait Islander cultural perspectives, knowledge and practices. With this in mind, Training Package developers should establish Indigenous advisory mechanisms to provide advice at key stages of the Training Package development process—genuine partnerships with Indigenous people and organisations in designing Training Packages is an important contributor to positive outcomes for Indigenous learners. Training Package Developer's Handbook (TPDH), DEEWR.

No formal mechanisms of consultation were established for Training Package reviews and development. In the four years since the Training Package Reviews were completed in 2006 ASA managed to consult 2 'Indigenous' individuals that are listed as key stakeholders. AgriFood Skills Australia, Key Stakeholder Feedback Report 12 Dec 09

In comparison, IBSA Business Services Governance Qualification Review – Indigenous focus, consulted with 76 organisations and 116 individuals of relevant stakeholders within the one month of January 2009. Web Site announcement, Wednesday 3rd February: Email Communication - BSB07: Manager 2020, Frontline Management, Innovation, Sales, Marketing and Advertising

ASA did not know how to consult or whom to consult.

What was the specific consultation with Indigenous people and groups on these pre-existing CLM units?
 By what mechanisms were these units determined to be Indigenous Land Management units?
 AHCILM201A Maintain cultural places
 AHCILM202A Observe and report plants and or animals
 AHCILM203A Record information about country

What was the specific consultation with Indigenous people and groups on this new unit?
 What mechanisms of consultation were used to develop this unit?
 AHCILM304A Follow cultural protocols

Some key issues for Indigenous learners that Training Package developers should be aware of include:

- the importance of early and frequent consultation with Indigenous people and organisations
- the need for training products to be responsive to the diverse needs, interests and circumstances of different Indigenous people and communities
- training that assists in the maintenance and development of Indigenous culture, including maintenance and development of languages, systems of belief, and a wide variety of cultural practices.

Training Package Developer's Handbook (TPDH), DEEWR.

How did AgriFood consult and with whom did AgriFood consult? If there was consultation then why did the units and qualifications remain identical to the original CLM versions of 2002?
 What effect if any did AgriFood consultations have?

AgriFood assumptions as to what constitutes consultation and what it takes to do that properly are way off the mark.

“The general perspective was that we should know what Agrifood is doing because Agrifood does not have the capacity to personally inform all of its stakeholders at every step of the way.

Problem is....Aboriginal people/communities have not been consulted at ANY step along the way and this is in stark contrast to other ISC's such as IBSA who I receive emails and invites from all the time to be involved in their development and review work” Wayne Munster, NSW Aboriginal Land Council, May 2010

Indigenous and Equity group representation

There were no Indigenous persons or representatives of Indigenous or Equity groups on the Steering Committee. Indigenous and Equity interests were not catered for and Indigenous and Equity aspirations were not met.

RTD02 Training Package Review Phase 1 Final Report December 2005

Membership Project Steering Committee	Organisation and representative group	Indigenous person or Equity Group Representative
Ralph Leutton (chair)	Cotton Australia Industry peak body	No.
Anne Wiltshire	North Melbourne Institute National training providers network and Public provider - VIC	No.
Cameron Archer	Tocal Agricultural College Private provider - NSW	No.
Carolyn McGregor	Department of Environment and Conservation Industry/government agency	No.
David Greentree	NSW Department of Natural Resources (previously Dept of Infrastructure, Planning and Natural Resources) Industry/government agency	No.
Dean Holland	Greening Australia Industry organization and training provider	No.
Don Hayes	Australian Workers Union Union	No.
Geoff Bloom	Rural Skills Australia Industry peak body	No.
Niels Jacobsen	Rural Training Council of Australia ITAB	No.
Rod Thirkell-Johnson	Tasmanian Farmers and Graziers Industry	No.
Paul Keegan	DEST Commonwealth Government	No.
Amanda Howden	NT Department of Employment, Education and Training Government (State Training Authorities)	No.

Similarly,

- the RTE03 Rural Production Project steering committee contained no known Indigenous persons or representatives,
- the RTE03 Amenity Horticulture Project steering committee contained no known Indigenous persons or representatives,
- the AHC10 Rural and related standing committee of March 2010 contained no Indigenous persons or representatives,
- and the AHC10 Training package steering committee contained no Indigenous persons or representatives.

At the time of writing it is unknown, but considered unlikely, if any members of the five current standing committees handpicked by AgriFood Skills Australia are Indigenous persons or representatives of Indigenous organisations. There may be one Indigenous person representing a non-Indigenous state based committee.

It is unknown if any members of any of the training package steering committees were Indigenous or Indigenous representatives. It is also unknown whether any members of the AgriFood Board are Indigenous or Indigenous representatives. There are no current members of staff at AgriFood Skills Australia who are identified as Indigenous.

It is recommended that best practice models be implemented for Equity group representation on all committees directing the design, consultation and development processes of Training Packages.

Core Skills

There are numerous units of competency with inappropriate core skills requirements and many units that have performance criteria, skills and knowledge content lifted by cut and paste methods from other, often higher level units, with very inappropriate results for core skills relevance and usefulness to current industry practice. No attempt has been made to integrate ACSF into the proposed AHC10 products.

Other Projects

Where a relevant project has been established or completed by ASA relating to the merged package area, the results or findings of the work have not been incorporated into the AHC10 training package development. An example is the Indigenous Park Ranger project which identified the work skills required for Park Rangers from 2008 – 2009.

None of the findings of this project were ever used in the development of the AHC10 Training Package despite having direct relevance on a number of key areas including:

- Indigenous units of competency, qualifications and imported units identified for Indigenous Ranger training,
- Conservation and Land Management, Horticulture and Agriculture units of competency, qualifications and imported units identified for Indigenous Ranger training,
- TPDH requirements
- Key VET sector policy and practice
- PPP and Skilling Australia for the Future initiative

RTD02 Conservation and Land Management Phase 1: Environment Scan Final Report, 2005

“It is important to note that a number of key stakeholders involved in implementing the CLM Package for indigenous learners have expressed concerns about the ability of the proposed Package to meet the needs or aspirations of indigenous people. Our research established that there are divergent points of view about aspects of the Package and how CLM is/should be implemented to best meet the needs of indigenous communities. See the Issues Register at Appendix 1. These issues will be followed up in the Phase 2 Review.” **RTD02 Conservation and Land Management Phase 1: Environment Scan Final Report, 2005**

The Phase 2 Review was not undertaken; there was no Issues Register published and the issues were never followed up. There was no Equity Report for the RTD02 Training Package and no consideration of the viewpoints of Indigenous people.

The concerns about the ability of the proposed Package to meet the needs or aspirations of indigenous people have reached breaking point with the national awareness campaign initiated recently.

RTF03 Phase 1 Scoping Report October, 2006

Attached as Appendix 1/16

The Scoping Report did not undertake any active consultation of Equity groups and relied on response to questionnaires to which no equity groups were represented by responses.

There is no evidence of the implementation of any of the Equity issues as defined in the Scoping Report recommendations.

2009 Environment Scan

Extract: “Indigenous Australians own and/or manage over 19 per cent of the Australian continent and are key stakeholders in *Caring for our Country* due to their significant knowledge, skills and land and sea management responsibilities in the protection of Australia’s natural and cultural resources.”

The 2009 Environment Scan produced by ASA acknowledges the significant contribution by Indigenous Australians.

However, there were no national or regional Indigenous associations, local area or regional Land Councils or Aboriginal Corporations consulted during the development of the AHC10 Training Package. An earlier listing of the key stakeholder groups showed no entries in the section for Indigenous Land Management consultation. A later publication of an AHC10 Consultation of Key Stakeholders provided reference to two Indigenous stakeholders: one private consultant and one government officer undertaking a separately funded project to the AHC10 Training Package project. It is unknown whether these persons represent Indigenous organisations.

The definition of a key stakeholder at AgriFood appears to be anyone with an email address.

Quality, Equity and Holistic Auditing and Assurance

Instead of early involvement, intervention and consultation of quality auditors in the developmental stages of the TP, ASA have hastily fabricated a shell training package and are undertaking a retro fit of the TPDH endorsement process requirements for quality assurance with an ‘end game’ approach to obtain sign off for the proposed products.

How this approach will work is unknown at this point in time as there appear to be substantial inconsistencies, errors, under-development and omissions in a large proportion of the proposed products for endorsement.

[Note: The Quality Auditor report has not been published at the time of writing of this document.]

Equity Report

One concern for the Equity report is that these issues and other errors and omissions are not easy to spot given the massive amount of documentation within a training package. A helicopter view often does not easily drill down to see the relevant fine detail and a soft report resulting from a broad Equity scan may not incorporate the known discrepancies that exist on the ground. The soft requirements of the Equity Report template are another issue. This report has highlighted major errors of judgment and serious omissions in consultation that may not be adequately addressed in the AHC10 Equity Report.

A major recommendation is a requirement for the Equity Auditor report to be a comprehensive audit that stipulates an Industry Skills Council to provide documentary evidence of compliance against a detailed set of rigorous Equity guidelines built into the Equity Report Template.

The Equity Auditor should have the forensic power to investigate issues of non compliance, evaluate the quality of evidence provided and specify remedial action required.

An Equity Auditor should possess formal auditing qualifications enabling a rigorous assessment of the quality of the processes of an Industry Skills Council.

Formal auditing of consultation processes needs to be undertaken by an independent and registered company or through a forensic audit division of NVEAC. The engagement of the Equity Auditor should be undertaken by the NQC and not by Industry Skills Councils.

A major recommendation is for the Quality and Equity Auditor to be prohibited from entering into contractual arrangements with Industry Skills Councils and to remain wholly independent from commercial considerations with Industry Skills Councils in relation to Quality Assurance processes related to Training Packages.

Summary

The scale and volume of the Equity issues involving AgriFood Skills Australia and Training Packages are extraordinary. The performance of AgriFood in Equity terms in discharging its due diligence responsibilities, consultation requirements and Training Package development portrays a picture of arrogance and a lack of accountability to stakeholders and government. AgriFood Skills Australia has failed to meet the requirements for Equity considerations in the review and development of national Training Packages.

Acceptance of the recently proposed merged AgriFood training package AHC10 will be perpetuating a structural disconnection with the only existing core Indigenous training package. Permanent disengagement of key stakeholders through construction of whole-of-life barriers to training and employment will be the result. Permanent damage to the VET quality system will be the liability. This demonstrates a level of incompetence by the AHC10 Training Package project management.

There are extensive and long term Equity issues outstanding in the proposed AHC10 training Package. There are also continuing Equity issues within the processes and methodologies used by AgriFood Skills Australia in the maintenance and development of Training package products. An understanding of and commitment to equity is not demonstrated in the selection and structure of Review Committees and Steering Committees, as well as the staff, management and Board of AgriFood Skills Australia. Therefore the AHC10 Training Package has not met the basic core requirements for endorsement as outlined in the National Quality Council Policy for the Training Package Development and Endorsement Process.

Numerous AgriFood activities are not undertaken in a transparent and accountable manner and there appears to be insufficient governance arrangements in place, zero penalties for non compliance, and no existing mechanism to enforce compliance with performance KPIs or amend funding as a direct result of non compliance.

Appendix 1 RTF03 Phase 1 Scoping Report October, 2006*

9.0 Equity Report

Training Packages are required by the NQC to pass an equity audit prior to submission for endorsement. Agri-food ISC has had a preliminary equity review undertaken as part of each Phase 1 Training Package review to highlight areas to be addressed during Phase 2.

The equity auditor's recommendations are listed below in Table 17 along with the proposed action to be taken in Phase 2 of the review.

Table 17: Equity review recommendations

Red = Not Done

Blue = Partially Done

Black = Yet To Be Done

	Equity review recommendation	Proposed action
1	Include information in the introduction to the Training Package about the nature of the workforce, as per the equity evaluation checklist, to recognise and positively connote the place of equity groups in the industry and their potential to play a full and significant part in the full range of occupational opportunities that exist.	Ensure that this information is included in the Introduction section of the Training Package unless otherwise recommended by AFISC.
2	Ensure Steering Committee members who have access to equity representatives seek feedback from these representatives for input into the Training Package review during phase two	Steering Committee members and the review team to seek feedback from as wide and diverse a section of stakeholders as possible and specifically seek the views of representatives of equity groups.
3	Ensure that stakeholders representing equity groups are consulted during phase two of the review process and that consultation is timely and carried out in the most appropriate way.	Equity groups will be specifically invited to participate in review processes and in a manner that best suits them.
4	Ensure language, literacy and numeracy skills are covered fully in new units of competency developed for the review of the Amenity Horticulture Training Package (RTF03).	New RTF units included in the TP will be reviewed to ensure that LLN skills are fully covered where achievement of workplace outcomes require them.
5	Allow for inclusive practices within relevant units of competency.	All RTF units included in the TP will be reviewed to ensure that inclusive practices are included where workplace requirements allow.
6	Allow for cultural diversity within the Amenity Horticulture Training Package (RTF03).	All RTF units included in the TP will be reviewed to allow for cultural diversity where workplace requirements allow.
7	Ensure that relevant legislation, codes of practices and standards are specifically referred to and that the extent of knowledge is stated	All RTF units included in the TP will be reviewed to ensure that the appropriate level of knowledge of legislation and regulation is noted in the evidence guide and that a broad description of the type of legislation is included (eg legislation and regulations covering quarantine).
8	Include resources/sources of information (to be developed by the equity evaluator) to do with the assessment of equity groups in the Assessment Guidelines.	Information being provided by the Equity auditor will be included in the Introduction to the Training Package.
9	Review the number of units and the level of knowledge required for Certificate II as per industry feedback.	All RTF units contained in Certificate II will be reviewed with particular reference to the level of knowledge required.

There was no Equity Report for the RTD02 Training Package and the report from the RTF03 review has been included for comparison.