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The Hon Julia Gillard MP  
Minister for Education  
PO Box 6022  
House of Representatives  
Parliament House  
CANBERRA ACT 2600  
21 June 2010

Dear Minister

***Re: Floristry Training Package Review by the Service Skills Australia Industry Skills Council***

Your urgent action is sought in the intervention of the current Floristry Training Package Review by Service Skills Australia (SSA). To support this request, please find attached copies of the Professional Florists' Association of NSW (PFA NSW) comprehensive industry responses to the revised Drafts released by SSA for industry consultation. You will note that both PFA responses reject outright the proposed Floristry Training Package as developed by SSA. However, after the Vice-President, Christina Lewis, tabled the PFA's 21 March 2010 response at SSA's Floristry Training Package Reference Group meeting on 30 April 2010 and raised the ongoing major concerns of the NSW industry, SSA has continued to ignore such industry advice and announced in their e-Newsletter May 2010 (Attachment 1) that:

*'The draft SFL10 Floristry Training Package has been agreed to by the Floristry Training Package Reference Group and has commenced submission process.'*

Your Government in its recent term has provided in excess of \$10 million to SSA for their core Industry Skills Council (ISC) role, including the development, revision and continuous improvement of relevant Training Packages. However, there is deep disquiet in our NSW industry community around SSA's consistent unwillingness to address key issues raised by industry across their Training Package redevelopment processes. As your Department does not require an industry specialist to be employed by an ISC when re/developing a Training Package, then industry's feedback about the adequacy or not of Training Package related ISC consultations, reports and drafts, should be recognised as critical to the NQC formulated process and not be allowed to be swept off the table by an ISC. It takes considerable time and effort away from core business for an industry association or network of enterprises to undertake substantive consultation and respond to poor ISC Training Package outputs. However, it appears that an ISC can either ignore or tire out the industry voice, so in the end, the ISC submits their work to the NQC for endorsement, with industry's outstanding issues buried without notice. Further there is no independent industry appeal process in place for industry concerns about Training Packages or other ISC matters to be raised without reprisal, other than writing to the Minister, who must rely on advice from their Department, who in turn relies on feedback from the ISC itself.

As the Training Package sits at the heart of Australia's VET system, if this critical qualification product does not reflect an industry's workforce requirements and expected graduate standards, then the rest of the National Training System also experiences associated problems when a poor Training Package is implemented. For instance, the AQTF audit regime struggles to respond to industry criticisms about lack of graduate quality or RTO quality in delivery and assessment where a Training Package offers inadequate units of competency, qualification entry requirements or packaging rules that do not meet industry needs. Providing government funding to address skills shortages through programs like the Productivity Places Program (PPP), will also not achieve the desired results, because graduates of substandard Training Packages will generally not gain employment if they cannot perform to industry benchmarks, particularly now in an industrial environment where award pay levels are increasingly being aligned with specific qualifications.

It is noted that your leading VET bodies such as the Department, Skills Australia and the National Quality Council are constantly investigating how to enhance our Vocational Education and Training (VET) system and products. I humbly suggest that the single most effective improvement for the national system would be the introduction of a formal Australian HE/VET governance architecture and accordingly, restructure how and by whom national Training Packages are developed in close concert with industry.

I write to you because through my company Redlaunch, I am contracted to the NSW Retail, Wholesale & Associated Services Industry Training Council Ltd (NSW WRAPS) as their Executive Officer. From 1983 until 1 May 2010, **NSW WRAPS** acted as the state Industry Advisory Training Council (ITAB) for seven service industries including Floristry. In this capacity, our State Training Authority (STA), the NSW Department of Education and Training, contracted NSW WRAPS for industry advice to inform their STA role in the **DEEWR/NQC Training Package Development and Endorsement Process** whereby Training Packages are developed or revised by ISCs. Now that our NSW industry training advisory arrangements are no longer performed by independent state bodies such as NSW WRAPS, but have been contracted to national ISCs, there is even greater local industry concern about ISCs having the added responsibility of endorsing their own Training Packages at STA level. Such conflicts of interest as more VET control is being concentrated under the power of ISCs adds to industry's concerns. For example, enterprises that wish to gain Enterprise-based PPP through their ISC may be intimidated into silence on Training Package and other important VET matters if they believe that their view is contrary to that prevailing in their ISC.

Until the Floristry industry's Training Package is top quality with qualifications and units of competency reflecting national and international industry standards and benchmarks, I witness that this industry is not encouraged to engage in accredited workforce development, no matter how much government funding is available. We hope you can change this dire situation by evolving and folding the Training Package development system into a new national VET industry framework.

Yours sincerely

Regina Dunlea  
*Director*  
*Redlaunch Australia*