



Ms Mary Hicks
A/Chair
National Quality Council (NQC)
L21, 390
St Kilda Rd
Melbourne VIC 3004

Dear Ms Hicks

Re: Training Package Quality – Review/Continuous Improvement Methodologies

Established in 1983, the NSW Food Industry Training Council (NSWFITC) is the independent, bipartite industry training advisory body (ITAB) for the Food, Beverages, Wine and Pharmaceutical Manufacturing sectors. The NSW Government contracts NSWFITC to provide strategic advice on vocational education and training (VET) policy, programs, funding, research and associated initiatives. A key focus is Training Package development, review and implementation.

Please find attached our letter of 25 January to the Agrifood Industry Skills Council regarding the redevelopment of the FDF03 Food Processing Training Package. We wish to bring to the attention of the National Quality Council (NQC), the many difficulties industry experiences under the current Training Package development/continuous improvement methodology in order to ensure that Training Packages do specify the skills and knowledge required to perform effectively in the workplace to a quality standard that is responsive to industry's existing and evolving skills' needs, whilst also shaping sound assessment practice.

NQC's recent report, ***VET products for the 21st Century***, confirmed that industry and businesses indicated strong support for the continuation of Training Packages and accredited courses as a single national framework. However, it is our experience that without open and inclusive industry-driven Training Package development, maintenance and endorsement processes, industry is increasingly prepared to walk away from their Training Packages.

Further, vocational qualifications are being aligned to industrial instruments and COAG has effectively determined that RTO Certification is sufficient evidence of occupational proficiency. Therefore, the quality and rigour of Training Packages' competency standards, their qualification or skills sets groupings, plus assessment advice, become critical pillars of the job market and career advancement.

In our response to the ***'Skills Australia Foundations for the Future: Draft Proposals for the Future Governance, Architecture and Market Design for the National Training System'*** consultation, NSWFITC supported:

"the formation of independent, national statutory arrangements for VET regulation and quality to ensure:

- *nationally consistent RTO registration, monitoring and audit services*



- *Training Package development and continuous improvement facilitated by ISCs according to a national code with a well-defined methodology such as:*
 - *industry sector functional skills progression analysis by nominated industry professionals (nomination process specified)*
 - *vocational jobs analysis by nominated industry professionals*
 - *competency standards content mapping by second group of nominated industry professionals*
 - *qualifications content mapping by ISCs*
 - *Training Package re-development by ISCs*
 - *industry review through independent, state and national enterprise consultation*
 - *Training Package final edit*
 - *Industry validation by authorised, representative panel*

(Note: It is anticipated that the NQC inquiry into 21st Century Training Products will address the issue of future Training Package development as the current system is imploding. NSWFITC suggests that Training Packages be renamed Industry Qualification Standards, eg NTIS No. Australian Meat Industry Qualification Standard)"

NSWFITC believes existing Training Package development also encourages the 'siloeing' of competency standards into particular Training Packages, thereby restricting recognition of skills across industries and occupations, and imposes structural barriers to implementation.

For instance, the Australian Department of Agriculture, Fisheries and Forestry (www.daff.gov.au) financed the development of Food Safety Guideline Units to support workforce development to assist compliance with the national, mandatory Food Safety Code (www.foodstandards.gov.au) and also the Food Safety Auditor Certification Scheme, both of which apply across the food supply chain encompassing thirteen different Training Packages (Food Processing, Meat, Seafood, Sugar, Retail, Transport, Health and Community Services, Hospitality, Public Sector, Qantas, Ricegrowers, Woolworths). These Guideline units were imported into the FDF03 Food Processing Training Package with only a code change, but other Training Package developers chose to "customize" the Guideline units for their individual Training Packages. Now there are hundreds of Food Safety units, resulting in a 'mismatch' of food chain safety and security competency standards across industry sectors, even though all food businesses must comply with the National Code. Similarly an NTIS search displays more than 500 OHS units, but again, all businesses no matter how large or small, or what industry sector, must comply with their state OHS laws and regulations that can be cross mapped. Now with national harmonization of OHS law, it would be timely to address the vast number of OHS units that impede national and industry sector portability. There appears to be limited recognition by Training Package developers of the convergence and connectivity of skills. Thus one also witnesses numerous units of competency in one Training Package being "lifted" into others with little more than a Code and Title change.

To date, the fact that Guideline units must have a Training Package code has acted as a barrier and allowed this proliferation of units with generic industry application. The existing Z Training Package could in fact become home to all such units and even qualifications with general purpose. As well as Food Safety and OHS, other units in this category could include



sustainability, environmental, communication, team leader, numerical literacy etc. NSW VETAB has just accredited AQF3 and 4 qualifications in Carbon Management, which will be utilized across industry sectors. Such qualifications could be offered through the Z Training Package.

NSWFITC requests that a strategy for reducing duplication of units across Training Packages be investigated by the NQC to promote national and industry portability and ease of skilling for compliance requirements.

It is noted that our Executive Officer is also the Executive Officer for NSW WRAPS, the state ITAB for the Retail, Wholesale, Community Pharmacy, Floristry, Hairdressing, Beauty and Funeral Services Industries. To demonstrate that the Training Package review issues raised in the accompanying AFISC correspondence are not isolated to just one Industry Skills Council, Part 2 covers the NSW WRAPS industry input to the current Floristry Training Package Review by Service Skills Australia. Part 3 is the analysis of the draft 2 SIB10 Beauty Training Package and illustrates the duplication of content of qualifications that may result where no functional analysis of the workplace skills progression and vocational outcomes occurs.

It is our belief that the national competency standards should have the same efficacy as ISO standards and be modeled on that template. Each unit must display a strong internal alignment between the elements, performance criteria, required skills and knowledge and critical aspects of assessment with quantifiable, measurable evidence requirements to ensure consistency in RTO implementation and audit compliance. Upon this standards framework, an RTO *'unit delivery and assessment implementation plan'* could be developed to demonstrate how the RTO will respond to diverse clients, environments and labour market demands to ensure flexibility, equity and quality outcomes.

As the Training Package is the critical tool that underpins the Australian VET system, NSWFITC urges the NQC to reconsider the existing Training Package methodology and unit of competency template, in order to maintain industry credibility in the NTS.

Yours sincerely

Regina Dunlea
Executive Officer
NSWFITC
1 February 2010