

Dear Secretary.

I am an acting head teacher, Industrial Electronics, at a NSW College of TAFE. I use the UEE07 Electrotechnology Training Package, or information derived from it, every day. I say information derived from it because the Package itself is particularly unhelpful. Of the thousands of pages that make up the Training Package document and its so called supporting documents, few have anything of substance.

It requires tedious extraction of a few bits of information from various parts hidden the Training Package and further extraction of material gleaned from supporting documents to even begin to understand an RTO's responsibility in terms of delivery of knowledge and skills or assessment of elements of work performance for any given section of any specified unit of competency. If EE-OZ was paid by the page, then the Government was ripped off. This is less so in the Certificate III in Electrotechnology, Electrician - you will note that EE-OZ is made up principally from ex-TAFE employees who were electricians. That is one course of many however and I am responsible for offering courses at all AQF level up to Advanced Diploma (Level 6).

I have tried to separate the useful information from each Unit of Competence definition and from Document 2 of the Training Package that contains a de-contextualised list of clauses called E.K.A.S. (Essential Knowledge and Skills). I haven't completed the task because - even though we live in the information age, EE-OZ has not metadata tagged the documents, provided indexing or cross referencing. I imagine when I have finished making sense of the Training Package and reducing it to a form that teachers and head teachers would find useful, I'll have something in the order of 160 pages. That is probably 4% of the pile of paper that EE-OZ has actually produced and which it forced teachers to sift through. If it weren't for the amazing levels of expertise of my teachers and the resources left over from when we had decent courses that can be re-developed or modified, expanded or contracted, increasing their workload almost beyond sustainability, they would be totally lost.

I offered my services as a technical writer to EE-OZ thinking naively that I might do some good. I was asked to produce some materials for two Digital Electronics Units. One is in Schedule 3 and one is in Schedule 4. Units in the Training Package are grouped into Schedules. These equate to AQF level. (Eg. Schedule 3 units are appropriate for AQF level 3 and higher. That equates to Certificate III).

I was given a draft copy of a CDP for both Digital Units. EE-OZ wanted a final version of the CDP and an LAP. The templates and examples of CDPs and LAPs I was given to refer to didn't really look like they were offering much. The way that the information was laid out made them impractical. I looked up all the information I could find, hidden in the Training Package and elsewhere, and found out a few interesting things. The words used to describe the Learning Specification, supposedly based on the EKAS, didn't look anything like the EKAS in one of the Units but it did in the other. I looked at the Work Performance elements that were defined in the Range Statement in the other unit and. lo and behold, the words were essentially the same as the

Learning Specification for the first. Either it was a mistake or the Work Performance and Learning Specifications had simply been swapped to make the Units appear different. I don't know who EE-OZ had been consulting with - they claim to consult. I don't know who they had contracted to do the writing of the Units (perhaps each other). I do know two things. Either something was wrong by accident - which shouldn't happen when you are doing work at a National Level - or something was wrong on purpose - which of course shouldn't happen at all. I am not making accusations. I will just say that I declined to complete the tasks asked of me. Even if I had wanted to, the results would have been meaningless.

In some courses, just one of the Digital Units exists. In some courses, just the other. In still other courses, both exist where one might be in the core group and the other an elective. The E.K.A.S. clauses listed for each were exactly the same. The nominal delivery hours for the S3 Unit was 72 hours. The S4 Unit, where you would go into more detail because of the Industrial Control Context that was implied by the title, only allowed 54 hours. In cases where both Units are in a course, head teachers are saying, "Well, if we teach the 54 hour Unit in a Cert IV or Diploma, since the students have already demonstrated all of the requirements for both - even though WP and LS are swapped - we can't deny them credit for the 72 hour Unit."

The way course requirements are linked to workplace performance is also a huge problem. Seemingly, no thought was given when requirements were defined for people who need to train to get a job. All the courses available lean strongly towards people who have a job and somehow are training for it. The apprenticeship mentality (which is not a bad thing in itself) cannot be applied to all courses. I have students doing assembly work who don't even want their employers to know they are training because they are aiming higher (Good on them) and the 'Boss' might not support their pursuits.

In an Advanced Diploma, there is necessarily a lot of learning required. So much focus is placed on the demonstration of a skill or completion of a task that some RTOs are crediting students based on workplace observation only. There is no assessment of the underpinning knowledge.

Another Unit that I looked at some time ago and provided EE-OZ with some documentation and advice on is UEENEED005B. This 18 hour Unit is based on the skills and knowledge required to enter or change settings or parameters in any microprocessor equipped device. It might sound technical but the way the few details in the Unit were written and according to the short statements that makes up the EKAS clauses listed in the Unit document, my eight year old daughter could satisfy the requirements by changing the ring tone on her mobile phone. One of my main concerns with all of the Training Packages and documents released so far is that the language is often inaccurate or ambiguous. It is as if it was written by people with little or no real expertise. Who are these people? I don't know. I only got involved when it was much too late to fix anything. I definitely was not invited to get involved earlier.

They, EE-OZ, keep producing more documents (still concentrating on the Cert III) like LAP (Learning and Assessment Plans) and CDP (Competency Development Plans) but these documents are just the same stuff, regurgitated. They are not much more helpful than the Training Plan from which they were born. If you look at the EE-OZ site - and get into the Resource Navigator

(something you have to pay a subscription to be able to do even as an RTO responsible for delivering the courses) OK so this sentence is too long. If you compare the number of Units for which documents have been created in the Resource Navigator with the number of Units in the training package, you will realise that only about 6% of the Training Package has any supporting material at all.

If you do find your way into the Resource Navigator, get a teacher to analyse the documents found there. There are references to documents that don't exist. There are different documents, each many pages long, that are identical except for the Title and the Unit number. There are documents that are just plain wrong. There are so few documents that are written to the Units I deliver that I have stopped bothering to look.

Not only is there no real support or direction from EE-OZ in regard to the current courses, they keep on making changes. We have had five major curriculum or course version changes in as many years. One whole collection of courses only existed for 6 months. If EE-OZ was paid according to the creation of courses, then the Government was ripped off.

The lack of support from EE-OZ goes as far as failing to provide any articulation from one course to another or from one Training Package to another. I have spent several hours with one student, and about a day and a half following up on that interview. The student completed a Diploma just two years ago who wanted to enrol in the current Advanced Diploma. Mapping old modules to units of competence and finding valid ways to assess workplace skills and experience is, in every such case, time consuming and inexact. Submissions I have made to EE-OZ over several years to address these issues have, for the most part been ignored. Those few to which a response was made did not lead to positive action. Some time ago, on the ISC website, the link to enable people to send messages to EE-OZ just stopped working so I gave up.

Beyond this dilemma brought about by an unsustainable rate of change, the design/definitions of the current courses often makes it difficult to create pathways from one course to the next level. One example where a particular Unit of Competence that is in the Core (mandatory) group for courses up to the Diploma of Electronics and Communications Engineering. The unit does not exist in the Advanced Diploma at all! Not even as an elective. Where several such instances occur in a pathway - and they do! - it means that students completing courses within a framework that many described as "lifelong learning", where progression is made throughout one's career, have to undertake more study than otherwise would be necessary. It have always seemed to me that the courses were just thrown together. Some changes have been made but recently, because yet another brand new Training Package is about to be released, it seems they have stopped trying to fix the old one.

This new Training Package will mean all new courses. Transfer of credit from the old courses will not be possible so the arduous RPL process will have to happen all over again. I mean, the '07 Package wasn't really that different from the '06 Package except that they shuffled some of the content around and created a mountain of work for Head Teachers. After all, electrons still flow in the same direction. It seemed like change for the sake of change. If EE-OZ was paid based on 'continuous improvement' then the Government was ripped off. There. I said it again. That brings me to the last point I want to raise in this submission. (I may write again later to note other specific concerns)

The creation of curricula and course should be a truly consultative process. Real representatives from industry should be actively engaged. Not CEOs of large companies who don't own the expertise necessary to contribute in a meaningful way. Teachers need to be consulted with from the outset. They are the ones who have the primary points of contact with industry and they are the deliverers. Change should not be wrought without notification and without need. I really don't know how managers and trainers in smaller, private RTOs cope.

Please feel free to contact me. I want to go back to having courses of substance that will benefit student and employers.

Oh. Here is yet another little point. Competency based training - as it has been adopted by EE-OZ and some of the other ISC sectors - was tried some 10 to 15 years ago in Europe and Brittain. It failed. Whole training systems collapsed and expensive and time consuming solutions to a growing problem of de-skilling and over-specialisation needed to be implemented. This was ALL BEFORE our ISC buddies started waving the flag and initiating a generational training disaster here in Australia. It is only due to the professionalism and good will of our excellent teachers and trainers that we will be able to mitigate the cost to industry here. Lets have another look at the whole thing!