



***Submission to the House of  
Representatives Inquiry into  
Vocational Education in Schools***

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## **Introduction**

National WRAPS welcomes the opportunity to make a submission to the House of Representatives Education and Training Committee Inquiry into Vocational Education and Training in Schools.

National WRAPS is the industry training advisory body (ITAB) for the Wholesale, Retail and Personal Services industries. It is the principal source of industry advice to government on the training needs of the industries.

The ITAB comprises a council of peak industry representatives (both employers and unions). Its membership and consultative processes ensure that industry views can be confidently canvassed and articulated. Thus the ITAB can identify the skills and vocational education and training that will enable the wholesale, retail and personal services industries to effectively compete and develop within the changing economic environment.

The retail, wholesale and personal services sectors collectively make up the largest employing industry in Australia. The National Wholesale, Retail & Personal Services ITAB represents 16.8% of Australia's workforce. Employment in 2001-2 in the industries covered by the WRAPS ITAB is estimated to be 1.55 million, and is roughly divided between the retail (63%), wholesale (25%) and personal services (12%) sectors.

Employment growth is expected in each of these sectors between 2000-1 and 2008-9. Over this period, employment in the WRAPS industries is predicted to increase by a total of 15.4% or 1.8% per annum, reaching 1.7546 million persons by 2008-9.

The retail industry is also the largest employer of young people within Australia, providing employment of 49% of all 15-19 year-olds in the labour market.

## **Key issues for VET in Schools**

The effective implementation of VET in Schools is hampered by inconsistent approaches adopted by state/territory education systems, which discourage industry involvement and in some cases impact upon quality. There is wide variation in many components of VET in Schools, including requirements for structured workplace learning, credit towards university entrance, and ability to attain a Training Package qualification.

As with other aspects of VET, there must be a greater emphasis on national consistency and accountability in this area.

National WRAPS has developed a set of principles for the delivery of VET in Schools, specifically focused upon Retail VET in Schools programs, and designed to facilitate arrangements that support industry acceptance of VET programs and outcomes.

These principles underpin this submission, which focuses specifically upon the first two terms of reference:

- the range, structure, resourcing and delivery of vocational education programs in schools, including teacher training and the impact of vocational education on other programs; and
- the differences between school-based and other vocational education programs and the resulting qualifications, and the pattern of industry acceptance of school-based programs.

This submission highlights a number of key issues in relation to the WRAPS industries' concerns and priorities in relation to VET in Schools.

### **VET in Schools programs must demonstrate comparable standards of outcome and delivery with other VET pathways**

There is some concern exhibited by employers within our industries that different VET pathways are not leading to equivalent outcomes. This is of particular importance in relation to VET in Schools. Under VET in Schools, students may be able to access training via either a school-based New Apprenticeship (tied to paid employment), or an institutional program that is managed entirely by the school system (not involving paid employment).

Employers have expressed concern that students who have gained Training Package qualifications through an institutional or non-traineeship VET in Schools pathway do not actually hold comparable skills to those with the same qualification, gained through an alternative pathway such as a New Apprenticeship. Anecdotal evidence suggests that some employers, and some non-school RTOs, are reluctant to recognise Training Package qualifications attained via a VET in Schools program. These organisations cite experience with individuals who hold Training Package qualifications, but are unable to perform the necessary skills in the workplace; the individual may be certified as competent, but they do actually not hold the requisite skills.

This suggests that there are a number of quality issues in relation to VET in Schools which must be addressed to ensure a perception by industry that this is a valid pathway leading to quality outcomes. Industry's specific concerns relate to:

1. the sufficiency of structured workplace learning, and
2. schools' compliance with AQTF requirements and their capacity to conduct programs in accordance with the requirements of the Training Package.

These concerns over inadequate quality mechanisms and outcomes can contribute to a situation in which industry may regard VET in Schools qualifications with some scepticism, and will favour employment of individuals with qualifications achieved through other pathways.

### *1. Structured workplace learning*

One of the key issues cited by industry has been the lack of appropriate structured workplace learning and workplace application of skills in some VET in Schools programs. Industry is of the view that successful completion of Training Package qualifications require integrated on and off-the-job learning.

In particular, industry stakeholders are concerned that all assessments are fair, valid, reliable and current, and that the standards and integrity of the Training Package are maintained.

Again, there are numerous inconsistencies across the states and territories, and between traineeship and non-traineeship delivery, in relation to the requirements around workplace learning in VET in Schools. These variations relate to the number of hours allocated to workplace learning, as well as the formal arrangements for establishing and monitoring structured workplace learning. Industry is concerned with both the quantity and quality of structured workplace learning.

In addition to the actual number of hours of workplace learning, there are key requirements in terms of the nature of workplace learning that need to be met to ensure that students gain real learning opportunities in the workplace.

The key issue is that structured workplace learning is not simply normal work. It must involve genuine training across the full range of workplace operations outlined within the Training Package qualification.

A number of states allow school students' part-time or casual work to be counted towards work placement requirements. While WRAPS supports this principle, where this occurs, it is necessary to ensure that these students are able to access structured workplace learning within their work, and are not simply confined to a narrow range of routine tasks.

Under current arrangements, students completing a school-based New Apprenticeship are covered by a training agreement. However, those completing non-traineeship VET in Schools programs are not covered by the same requirements. In some states, there is no requirement for the school to undertake monitoring of workplace learning and formal workplace assessment.

National WRAPS considers that all VET in Schools students must be covered by a signed training agreement which specifies the agreed training plan, provides for proper structured on and off job training and ensures equivalent educational outcomes and procedures for school students as for others undertaking the same certificate.

This agreement must also be resourced and monitored effectively. In practice, each student should have access to a designated person with appropriate expertise and adequate resources, who liaises between student/school/employer/RTO, co-ordinates on and off-the-job delivery and keeps all parties appropriately informed.

## *2. Compliance with AQTF requirements*

There is a clear need for regulation of all organisations delivering Training Package qualifications, to comply with the AQTF standards. Effective regulation and audit procedures are a key component in ensuring higher levels of industry confidence in the outcomes of training programs.

Industry strongly advocates that schools seeking to become RTOs undergo the same processes as any other organisation, and are subject to effective auditing and monitoring processes to ensure quality outcomes. This entails meeting infrastructure, equipment and human resource requirements, conducting programs in full accordance with Training Package requirements, and providing adequate support to students.

The provisions of the AQTF relating to the skills of teachers are of significant concern to industry. There is concern that some teachers delivering VET in Schools programs may hold little or no current, relevant industry experience. At present, few states provide specialised training for teachers involved in delivering VET in Schools. This is of particular concern when schools are delivering VET in Schools themselves; the risk is that the teacher is not adequately equipped to make the necessary linkages to the workplace, or to conduct effective industry-specific training and assessment.

Registration processes must be applied in a manner that adequately monitors compliance with the AQTF; in some situations, schools as RTOs are combined into clusters, and are therefore not audited and monitored individually. There is also some concern with the rigour of auditing practices applied to schools.

Where schools are not adequately equipped to meet AQTF requirements, delivery and assessment should be available through other Registered Training Organisations, with sufficient funding and resources made available to support this option.

### **All VET in Schools programs should be based upon industry-agreed qualifications**

School based VET programs, including school based traineeships and apprenticeships, must be integrated into the broader industry-led vocational training system and not develop as a separate system.

As such, Training Package qualifications should form the core of all VET in Schools programs. The term 'VET in Schools' should only describe those programs which deliver competencies endorsed within the national training framework and provide credit towards a credential within the Australian Qualifications Framework. Other education about the world of work, which is not related to endorsed competency standards, should be regarded as part of general education and not as VET.

The specific Training Package qualifications available through a VET in Schools program should only be those which have been identified by industry as appropriate for this pathway. In relation to the WRAPS industries, these are specific entry-level programs that industry considers appropriate for delivery under a VET in Schools program. These qualifications are identified on the basis of industry structures and

related skills needs, and their use ensures that the competency outcomes attained under VET in Schools programs are realistic, relevant and appropriate to the industry.

There have been numerous instances where various players within VET in Schools have sought to deliver qualifications and competencies that are not supported by industry for this pathway. The general argument proposed by educational authorities appears to be that the specified industry qualification is not of sufficient intellectual rigour to count toward a university entrance score, and that alternative qualifications should be offered, or additional content or examination processes should be introduced. This points to a continued tension faced by students, between the achievement of industry-recognised VET qualifications and tertiary entrance.

Insofar as industry recognition is considered a significant outcome for students, the needs of industry must be addressed. It is essential that accountability is introduced into this area of the system, and that VET in Schools programs are defined and conducted in a manner which accurately reflects the needs and concerns of industry. State education systems therefore need to apply meaningful monitoring processes that take account of industry positions, and intervene into inappropriate arrangements where necessary.

### **VET in Schools should be counted fully for the purposes of university entrance scores**

National WRAPS recommends that VET in Schools programs should complement key competency delivery, expand opportunities for senior secondary students and, as far as practicable, keep open the option of participation in higher education. Participation in VET in Schools programs should therefore not disadvantage students for the purposes of university entry.

Again, there is little consistency across states and territories in terms of this issue. However, at present only one state allows students the option to count Retail VET in Schools subjects toward their university entrance score.

This effectively creates separate 'vocational' and 'academic' streams, based upon which subjects contribute toward tertiary entrance. Students are effectively pushed into one stream or the other, with VET in Schools positioned as the option for those who are unlikely to achieve a university entrance. This diminishes the status of both VET in Schools and VET in general, and negates its potential for making a positive contribution to the development of all young people.

The low status of VET is of major concern to industry, which supports VET as a means of enhancing its skills base and competitiveness. It also restricts the range of options available to students. The system would be better served by arrangements which situate VET in Schools as complementary to traditional school subjects, and of comparable standing.

## **Careers counselling should be examined to provide an enhanced industry focus**

A related issue is the need for the school system to contribute more meaningfully to students' transition from school to work, and to the choices young people make about careers. Industry stakeholders have expressed concern that the school system in general, through its provision of careers information, exhibits a strong bias toward preparing students for university entrance, rather than for vocational streams that it sees as 'second best'.

The WRAPS industries collectively account for 16.8% of all employment in Australia, and are continuing to grow at higher than average rates. Many career opportunities are available within these industries, but it appears that students are not being encouraged to consider these careers. This is due in part to a lack of informed, unbiased advice about career opportunities, that takes into account the realities of the Australian economy, employment patterns and the skills and experience employers are seeking. Instead, the current situation sees students and their parents focus on university courses as the only way to get a 'good' job. This overlooks the fact that employers increasingly seek employees with a broad set of skills and experience, not just formal university qualifications. It also does not take adequate account of the need for employees to continually acquire and upgrade new skills throughout their working lives.

This is an ongoing cultural issue for the Australian education system, and Australian society in general. It does not serve the interests of young people to be streamed into university simply because it is seen as the 'thing to do' – relevant vocational competencies are highly valued by employers, and this also needs to be communicated to students.

National WRAPS considers that it is important that programs be developed to enhance schools' ability to provide careers advice which is more vocationally oriented. Strategies could include programs to recruit teachers and careers advisors with vocational experience, and professional development programs that highlight trends in employment and the role of real vocational programs.

## **Fair workload for students**

National WRAPS is concerned to ensure that VET in Schools programs are not placing unacceptable demands on students in terms of workload, and that these students do not have a heavier workload than others. VET in Schools programs should therefore be timetabled so that these students do not miss other classes, and are not precluded from enrolling in other subjects.

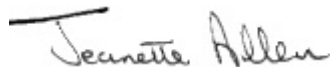
In practice, it appears that states and territories differ in their approach to this issue; some provide more flexible arrangements, while others retain 'traditional' timetabling models that disadvantage students undertaking VET in Schools.

## Conclusion:

VET in Schools programs have the capacity to provide beneficial outcomes for industry, employers and schools. However, the current models are not entirely successful in maintaining the quality outcomes that industry and students require. The current inconsistencies between state systems, and lack of adequate regulation, monitoring and support in some areas of VET in Schools, lead to variable quality outcomes, which undermine industry acceptance of VET in Schools.

The key priorities in terms of improving outcomes include:

- ensuring quality structured workplace learning occurs, and establishing mechanisms to facilitate and monitor this process;
- taking real action to ensure accountability; all VET in Schools programs must be conducted in full accordance with industry requirements, as specified in endorsed Training Packages and the AQTF; and
- establishing mechanisms to ensure that students undertaking VET in Schools programs are not disadvantaged through unrealistic workload or the perpetuation of 'streaming' arrangements that limit their options.



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