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AUSTRALIAN NATIONAL TRAINING AUTHORITY

Quality in VET in Schools Project

Final Report

July 2003

Contents

1   Introduction

The Australian National Training Authority (ANTA) has engaged KPA Consulting, in association with Peter Noonan Consulting, Gientzotis Consulting and the Assessment Research Centre based at the University of Melbourne, to undertake a detailed examination of a range of issues concerning the Vocational Education and Training (VET) in Schools program.

The project has required desktop research, consultations, analysis and reporting across three elements related to the program:

*   Element One: An investigation of the operation of the Australian Quality Training Framework (AQTF) in 2002 in the schools sector;

*   Element Two: An inquiry into concerns raised by industry organisations about the institution based delivery and assessment of VET without a workplace component in the schools sector; and

*   Element Three: An evaluation of the coverage of the VET in Schools program.

The project scope centres on issues related to VET in Schools. Some discussion relates to the interface between VET in Schools and School Based New Apprenticeships, however, this report should not be read as a review of that program.

The project was initiated in early March 2003, with consultations starting on 7 March and concluding on 28 March. A draft Interim Report was considered by the National Training Quality Council (NTQC) in April and, following comment by the NTQC, the interim report was completed on 12 May 2003. This final report was prepared after considering the outcomes of case studies in six schools across six States.

1.1   Research team

Jill Gientzotis has assumed primary responsibility for all consultations and research in relation to Element One. Jill's background as a former manager of accreditation and registration services and as Commissioner for Vocational Training in New South Wales ensures a high-level of experience in relation to the assessments conducted regarding the implementation of the AQTF.

Geoff Noblett, from KPA Consulting, and Peter Noonan have shared the responsibility for completing the research in relation to Elements Two and Three.

Patrick Griffin and Shelley Gillis from the Assessment Research Centre at the University of Melbourne have contributed to the second stage of the project by completing the project case studies.

1.2   Report structure

The remainder of this report is structured to provide the following:

•   an overview of the project methodology;

•   contextual background information;

•   a high-level analysis of the issues and other considerations derived from the desktop research, consultations and case studies;

•   analysis of the specific issues related to each project element; and

•   an overview of general findings and conclusions and a strategy to progress the findings into future actions.

2 Background, methodology and research

2.1 Background

Since the commitment of funding by the ANTA Ministerial Council in 1996, the VET in Schools program has experienced unprecedented growth from 60,000 participants at its inception to 185,520 in 2002. With additional funding contributed by the Commonwealth and State and Territory education authorities, the program has fostered a significant change in the provision of post compulsory education throughout Australia, with over 90 per cent of secondary schools now participating in the program.

This growth is part of a wider success story which needs to be acknowledged. VET in Schools is an integral component of a broader reform program which has enabled the development of a nationally recognised framework of vocational education and training qualifications and delivery structures that have evolved over the last 10 to 15 years.

2.2 Challenges

VET programs provided while young people are at school can be shown to have made a considerable contribution to the development and realisation of the new framework for vocational education in schools devised by the Ministerial Council on Education, Employment, Training and Youth Affairs (MCEETYA). Schools have made significant progress in ensuring that vocational education is an essential and valid element of the education of all students. Yet, there remain lingering concerns on the part of industry that it is somehow of a poorer quality than other VET programs and that schools, as Registered Training Organisations, are not subject to the same audit rigour as other RTOs. These concerns can be evidenced in a number of submissions to the current House of Representatives Standing Committee on Education and Training Inquiry into Vocational Education and Training in Schools.

Furthermore, whilst growth in vocational education delivered as part of a schools program is regarded positively by most stakeholder groups, it has also produced a number of challenges that have been documented in research findings and commissioned reviews and articulated in a number of relevant forums. These challenges include the need to foster:

• sustainability – ensuring that management, resourcing, industry partnership and accountability issues are acknowledged and dealt with to avoid programs within schools and school systems foundering under the weight of their own initial success;

• compatibility – ensuring that program provision aligns with industry needs and labour market priorities, as well as determining the circumstances where programs are better suited to institutional or workplace delivery;

- consistency – ensuring provision aligns with the requirements of Training Packages and is reliably replicated across sectors and jurisdictions, as well as between various forms of delivery – both institutional and workplace; and

- quality – ensuring that programs comply with the Australian Quality Training Framework (AQTF) and that VET in Schools providers implement programs and assessment processes to prescribed standards and with a consistent level of rigour.

2.3   Methodology

Figure 2.1 provides an overview of the methodology for the project.

Figure 2.1:   Project methodology
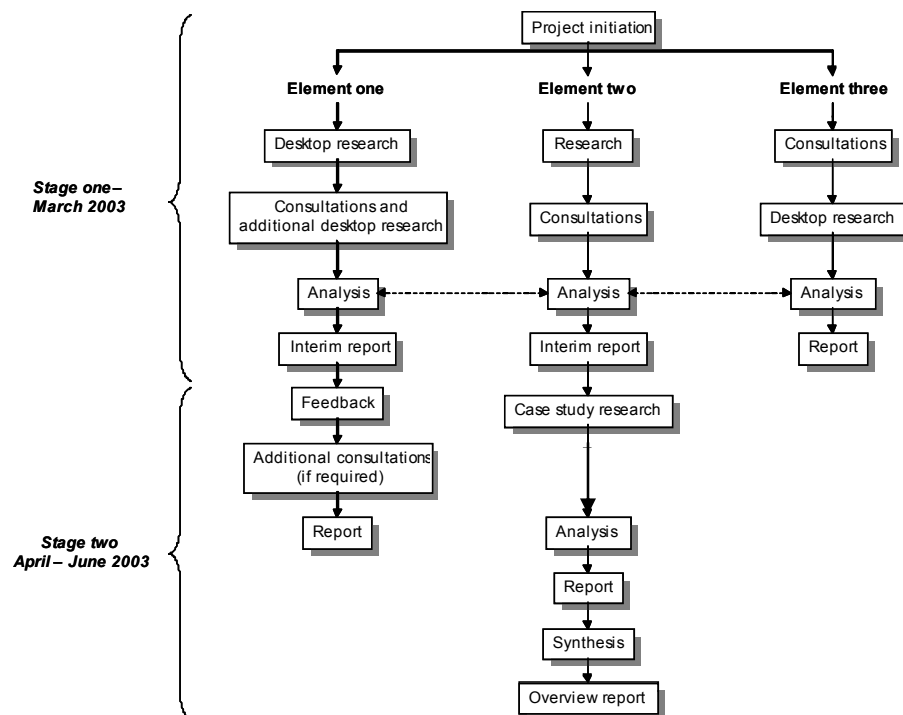
The project methodology has centred on:

- desktop research and analysis of existing data, research reports, submissions and other written material related to VET in Schools;

- consultations with registration bodies, curriculum and assessment authorities, education authorities, industry bodies, schools and other relevant stakeholders across Australia;

- analysis of the outcomes of this research and the consultations; and

- six case studies of VET in Schools programs across Australia.

2.3.1   Analysis framework

ANTA is currently developing a risk management framework for the VET system. Within this draft framework, institutional pathways delivering training and assessment that is not relevant to industry skill needs are identified as areas of risk. Given that VET in Schools is a key source of institutional delivery, we have applied a risk 'lens' to our analysis of the data gathered through the desktop research consultations and case studies, as illustrated in Figure 2.2, but have not prepared the report as a detailed risk management analysis and strategy. However the findings could be considered by the NTQC as a series of risks and treatments.

Figure 2.2:   Analysis framework

Risk analysis

Element one

• Legislative frameworks
• Models of provision
• Models of registration
• Teacher qualifications and industry currency
• Extent of industry involvement in key processes
• Extent of partnership arrangements

Element two

• Arrangements for assessment of competence
• Extent of alignment with Training Package requirements
• Extent to which simulated assessments align with workplace experience
• Identification of competencies where VET is embedded within subjects/courses

Element three

Coverage by:
• Industry areas
• Training Packages
• AQTF levels

Coverage and pattern of provision aligning with:
• Labour market demand
• Skills shortages
• Employment patterns for school leavers
• The needs of new and emerging industries

2.4 Research

2.4.1 Desktop research

KPA Consulting is highly conscious that this project exists within a substantial body of research in relation to VET in Schools. This research includes:

- national projects/initiatives/studies, such as:

    o Australasian Curriculum, Assessment and Certification Authorities (ACACA) (2002) *The AQTF and VET in Schools*, a report to the NTQC completed by the VET in Schools sub group, February;

    o MCEETYA (2003) Report of the MCEETYA taskforce on transition from schools, July;

    o MCEETYA Taskforce annual reports;

    o Allen Consulting Group (2003) Organisational Best Practice for the Delivery of VET in Schools, issues paper, February;

    o Australian Education Union (2002) VET in Australian public schools: enhancing career options;

- the outputs of research conducted at a State and Territory level, such as:

    o Department of Education and Training, Western Australia (2002) *Review of vocational education and training in schools*, December, Government of Western Australia;

    o Department of Education and Training, Western Australia (2002) *Partnerships at work: good practice models for VET in Schools under the Australian Quality Training Framework*, in conjunction with the Training and Accreditation Council of Western Australia, November;

    o Office of Post Compulsory Education and Training, Tasmania, *Models of VET delivery throughout rural and regional Tasmania*, Department of Education;

    o Evaluation of vocational education and training in ACT schools 1999–2000 (2000);

    o Government of Queensland, (2002) Queensland the smart state: education and training reforms for the future. A white Paper;

    o Noonan P and Maxwell G (2001) A Review of the delegation for VET in Schools from the Training Recognition Council to the Queensland Board of Senior Secondary Studies, conducted by The University of Queensland; and

- reports by State and Territory education and training authorities to national bodies, such as the NTQC.

This material has been used as a background to our research, both to inform our consultative processes as well to provide sources of data to support the development

of our interim findings. In addition, the project team has made extensive use of submissions made to the House of Representatives Inquiry into Vocational Education and Training in Schools by State and Territory education and training authorities, ANTA, peak industry bodies and Industry Training Advisory Bodies (ITABs).

2.4.2   Consultations

Consultations were held with representatives of the Australian Industry Group, the Australian Chamber of Commerce and Industry, the Australian Council of Trade Unions, the Enterprise and Career Education Foundation and the following Industry Training Advisory Bodies:

• Wholesale Retail and Personal Services;

• Manufacturing Engineering and Related Services;

• Tourism and Hospitality;

• Business Services; and

• Information Technology and Telecommunications.

During the process of consultations with Commonwealth government agencies that were primarily undertaken for element one of the project, the nature of any concerns at a State and Territory level were also identified.

However, research and consultation focussed on identifying the extent to which concerns were shared across industry groups and sectors relating to 'institutional pathways' generally, that is VET programs leading to competency outcomes where students primarily acquire skills and knowledge within VET institutions, including simulation of work environments, but with limited or no access to actual work environments.

Table 2.1 provides a breakdown of the individuals from stakeholder groups consulted during this project. A complete list of stakeholders is included at Appendix Two.

Table 2.1: Consultations with major stakeholder groups

Stakeholder group	Consultations
Education and training authorities	45
Registration/audit bodies	15
Curriculum and assessment bodies	9
Peak industry and employer organisations	3
National ITABs	11
Other ITABs	9
Employers	4
School representatives	9
TAFE representatives	5
Other	2

2.4.3 Interim report

Following the completion of the first phase of the project, a draft interim report was documented for consideration by the NTQC. This process included a presentation of the interim findings by the project team to the NTQC meeting held in April 2003 and a subsequent follow up teleconference by the NTQC later in the same month. Feedback from the NTQC was incorporated into a revised interim report which was circulated to additional stakeholders by ANTA for further comment in May 2003.

2.4.4 Case studies

Six case studies of VET in Schools programs were conducted in schools located in Queensland, New South Wales, the Australian Capital Territory, Victoria, South Australia and Western Australia during May and June 2003.

The main purpose of the case studies was to provide qualitative insights into the delivery and assessment of VET in School Programs, in particular, to identify quality indicators in:

• the environments in which VET in Schools programs occur; and

• the processes and procedures which have been implemented in relation to:

    o   quality assurance, particularly in relation to AQTF compliance;

    o   program organisation, design and delivery;

    o   provision of structured work placements; and

    o   assessment of competencies.

Each case study was conducted over a two-day period and involved:

- interviews with the school principals, VET in Schools coordinators, VET teachers and students;

- additional interviews with partnering providers (TAFE) and employers;

- observation of VET classes; and

- a review of relevant documentation, such as scope of registration, assurance procedures and student logbooks, assessment materials, memorandums of agreement, and recording and reporting forms.

Individual case study reports are included at Appendix Six.[1] Each report includes a contextual discussion of the relevant State or Territory arrangements for VET in Schools. The case study reports are preceded by an overview of the key findings (see Appendix Five).

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[1] Individual schools have not been identified in the case study reports.

3   Analysis

This analysis begins with an overview discussion of the insights gained through the desktop research, consultations and case studies. It must be emphasised that the identification of industry concerns and the responses to these concerns is a summary of views on the public record or raised in the consultation process.

The overview is then followed by an analysis of specific issues related to the three project elements:

- **Element One: An investigation of the operation of the Australian Quality Training Framework (AQTF) in 2002 in the schools sector.** This involved reviewing reporting on the operation of the Australian Quality Training Framework (AQTF) in 2002 to see if school based Registered Training Organisations (RTOs) are being audited in a similar manner to other RTOs.

- **Element Two: An inquiry into concerns raised by industry organisations about the institution based delivery and assessment of VET without a workplace component in the schools sector**. This part of the research investigated what evidence exists to support industry concerns, including whether they are general or relate to specific programs and whether the concerns are specific to VET in Schools programs.

- **Element Three: An evaluation of the coverage of the VET in Schools program.** This evaluation examined the extent to which the coverage of the VET in Schools program across industries is meeting the needs of employers and students and when direct delivery by schools and delivery by mainstream VET providers for school students is appropriate.

3.1   *Setting the scene – analysis derived from the desktop research, consultations and case studies*

3.1.1   Desktop research

In its review of the ANTA VET in Schools program, the Allen Consulting Group concluded that:

> *…Although a great deal of progress has been made, a range of quality issues remain – including around teacher training; training institutions; [and] learning environments (structured workplace learning). The full potential value of the ANTA VET in Schools program can not be achieved until these issues are substantially resolved and until it can be said that the transition process is essentially completed.[2]*

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[2] Allen Consulting Group, *Review of the ANTA VET in Schools Program. Final report to the Australian National Training Authority,* June 2000, p.57.

Subsequently, the ANTA Ministerial Council (MINCO) and MCEETYA agreed to adopt a range of measures and new guidelines for ANTA's VET in Schools program that were designed to address the issues identified in the Allen Consulting Group Review.

In July 2002, the *Report of the MCEETYA taskforce on transition from schools* indicated that:

> *Industry has expressed concerns that students undertaking institutionally based VET do not exit with the same skills as those whose training has occurred largely in the workplace. There are perceptions that schools which are offering VET are not meeting the same standards as other RTOs. The project was unable to find any concrete evidence to substantiate these concerns in relation to schools. Nonetheless, to the extent that any such perception is widespread, there is potential risk for the recognition of student's VET qualifications.[3]*

In February 2002, a report *The AQTF and VET in Schools: a report to the National Training Quality Council*[4] was presented to the National Training Quality Council. This report described the former Australian Recognition Framework (ARF) arrangements in each State and Territory as they related to VET in Schools programs and considered the impact of the new AQTF on these arrangements. The report made the following conclusions.

- VET arrangements differ in all States and Territories in that there is a variety of delegation arrangements, a variety of delivery models and a broad range in the scope of registration.

- Processes, procedures and professional development opportunities are being provided for all RTOs, including schools to support them with the implementation of the AQTF. There was, however, a degree of nervousness amongst schools with regard to quality assurance across all sites and the need for support and funding with regard to the implementation of vocational education and the AQTF in particular.

- Evidence indicated that schools have been compliant with the AQTF and intended to meet standards within the AQTF. The report found that quality assurance monitoring of schools was no different from that of other RTOs and that schools were subjected to the same quality assurance processes as other RTOs.

The report failed to find any substantial evidence to support industry concerns that:

- students issued with a qualification may not actually have the skills required under that qualification;

- the delivery of VET in an institutional setting failed to deliver industry competence; and

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[3] MCEETYA, *Report of the MCEETYA taskforce on transition from schools,* July 2002, p. 11.
[4] Queensland Board of Senior Secondary School Studies, *The AQTF and VET in Schools: a report to the National Training Quality Council,* February 2002.

- VET delivery in schools was of a poorer standard than VET delivery by other RTOs.

The report found that industry concerns about delivery of VET through an embedded model, resulting in students being awarded a qualification without having to demonstrate competence, were unfounded as *'...in each state and territory where embedding occurs, assessment occurs against each unit of competence for VET results'*[5].

The report also indicated that industry concerns about the quality of outcomes were greater for higher qualification levels.

The nature of industry concerns

Our desktop research has highlighted a continuing concern across peak industry bodies and most ITABs about the extent to which outcomes of VET in Schools programs meet both employer needs and the specific requirements of Training Package qualifications. The submission from the Australian Industry Group (AIG) to the House of Representatives Inquiry into VET in Schools highlighted these concerns:

> *AI Group's concern is the capacity of schools to deliver Training Package outcomes outside of contracts of training, particularly in industry sectors such as manufacturing. The issue of understanding workplace competence is central to this concern.*[6]

The Australian Chamber of Commerce and Industry submission to the House of Representatives Inquiry went on to emphasise the importance that employers place on on-the-job learning because of the '*…direct relevance of the skills acquired and the assurance of standards*', and that the quality of VET delivery is not possible without an on-the-job learning component. The submission went on to indicate that while *'simulated learning (sic) provides a good grounding in pre-employment outcomes it should not be considered as a quality substitute for on-the-job learning'*.[7]

A similar view is reflected in the AIG submission, which stated:

> *The Training Packages that have been designed for industries such as manufacturing and construction have safety and/or industrial requirements that can preclude delivery in any circumstance other than a structured workplace program. (p . 3)*

Similar issues and concerns are evident in submissions from other organisations. Group Training Australia indicated that:

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[5] Queensland Board of Senior Secondary School Studies, p. 6.
[6] Australian Industry Group, *Submission to House of Representatives Standing Committee on Education and Training, Inquiry into Vocational Education and Training in Schools*, October 2002, p. 3.
[7] Australian Chamber of Commerce and Industry *Submission to the House of Representatives Standing Committee on Education and Training, Inquiry into Vocational Education and Training in Schools*, October 2002, p. 11.

Many schools, and school systems, are now RTOs and are delivering the off-the-job training that is required as part of vocational courses. However, employers are often dubious about the quality of the training being provided in schools by schoolteachers who are generally seen to lack any real industry experience and often train using facilities and equipment inferior to that which would be available in TAFE.[8]

Group Training Australia also indicated that:

Employers are also not convinced that a qualification gained through an institutional pathway, even if it includes some work placement, is comparable with the same qualification gained in the workplace under a Training Contract, regardless of their supposed parity under a competency based system. Quite apart from the view that real skills are not acquired through institutional training, there is also the issue of maturation which, it is believed, can only be acquired through work. This concept encompasses notions of workplace acculturation, personal responsibility, initiative and other employability and work effective skills that come from having had the experience of being a worker.

In its submissions to the Inquiry, the TAFE Directors Association (TDA) of Australia indicated:

If VET in school programs are to have credibility with industry, and sound pathways are to be developed to higher-level vocational courses, it is very important that appropriate quality systems and processes are in place and that the overall integrity and characteristics of VET, as contained within the principles of the AQTF and requirements for RTOs, are maintained. It is TAFE Institutes' view that this is not always the case and it makes the process of auspicing schools' programs increasingly difficult, both in the amount of resources required and the lack of control over how schools conduct their assessment and delivery.[9]

The ANTA submission (ANTA 2002) to the Inquiry identified the range of concerns raised by industry, such as:

• assurance that training achieves industry standards;

• workplace based training and learning opportunities;

• assurance that programs offered, particularly at Certificate III, are realistically attainable;

• assurance that higher-level programs are being offered in suitable environments;

• clarity of communication; and

• VET in Schools is sometimes perceived to be 'second rate' or for students at risk.

The ANTA submission indicated that the concerns are anecdotal. It also made the point that the industry views sometimes relate to VET in general and sometimes to

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[8] Group Training Australia *Submission to the House of Representatives Standing Committee on Education and Training, Inquiry into Vocational Education and Training in Schools*, October 2002.
[9] TAFE Directors Association *Submission to House of Representatives Standing Committee on Education and Training, Inquiry into Vocational Education and Training in Schools*, pp. 3–4.

VET in schools, and that industry experience of VET in schools varies from jurisdiction to jurisdiction.[10]

In addition to concerns about the capacity of schools to deliver required competency outcomes and general compliance with the AQTF, other concerns were raised in a number of the submissions. These include:

- where VET subjects are 'embedded' in broader school programs, the extent to which assessment practices address the assessment requirements of the relevant units of competency or may impose additional requirements for purposes of secondary school certification or tertiary entrance ranking;

- the extent to which VET in Schools subjects count for the purposes of tertiary entrance;

- organisational and timetabling issues, particularly in relation to opportunities for students to undertake work placement in a way that allows skills to be developed and assessed in a structured and sequential manner; and

- the extent to which the pattern of provision of VET in Schools meets labour market needs and addresses skills shortages and emerging industry needs.

Submissions from State governments and State government agencies to the Inquiry have acknowledged the concerns raised by industry groups, but have also argued that these concerns are either perceptions or are based on anecdotal, rather than direct, evidence.[11] Similar views were expressed during the consultation process. The submissions have also indicated how schools, boards of studies and education authorities are seeking to address industry concerns through the process of AQTF compliance, through the development (and, in some jurisdictions, mandating) of work placement requirements, through the use of partnerships with other Registered Training Organisations, and through more effective marketing to employers.

The various reports and submissions analysed for the project also highlight the diverse ways in which VET in Schools is delivered. These pathways are summarised in a complementary report currently being undertaken by the Allen Consulting Group as:

- school as RTO;

- administrative unit as RTO;

- partnership (with another RTO);

- purchased delivery (from an RTO); and

- clusters (of schools)[12].

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[10] ANTA *Submission to House of Representatives Standing Committee on Education and Training, Inquiry into Vocational Education and Training in Schools*, pp. 36–38.

[11] See submissions by the Queensland Government (2002) and the Department of Education Western Australia (2002).

[12] Allen Consulting Group *Organisational best practice for the delivery of VET in Schools*; February 2002, p. 6–7.

More generally, submissions from industry bodies emphasised the importance of employability skills and foundation skills for employment in a range of industries and occupations and for lifelong learning.

3.1.2   Consultations

Consultations with representatives of national peak industry bodies, ITABs and with the States and Territories were largely consistent with the views summarised above and outlined in the written submissions to the current House of Representatives Inquiry.

However, the degree of concern expressed in the consultations varied between the representatives of the Industry Training Advisory Bodies. Sectors where traditional apprenticeship pathways have been the predominant means of skills training, together with the retail sector, more strongly emphasised the importance of clearly defined work based delivery and assessment arrangements than sectors where either institution based courses have been the prevalent means of delivery or where skills are applied across occupations (such as office administration and information technology, particularly at lower levels).

This is not to say that assessment in workplace contexts is seen as unimportant in the latter contexts; but rather that the diversity of pathways and circumstances within which assessment could take place are more widely recognised.   The consultation process provided the opportunity for a number of issues raised in previous reports and in the submissions to the House of Representatives to be explored in greater detail. For example:

- All industry and ITAB representatives who were consulted acknowledged that their concerns about quality related to 'institutional pathways' generally, that is, the extent to which competence could be assessed without significant workplace experience, regardless of the nature of the RTO. However, risks in school settings, where schools were 'stand-alone' RTOs, were seen to be greater due to physical and human resource requirements and the process of adjustment to competency based training requirements.

- There was a strong affirmation of the importance of all young people acquiring the skills and knowledge to prepare them for both work and further learning, and a recognition that most young people would go through a number of career transitions. Some industry and ITAB representatives queried the emphasis in VET in Schools programs on acquisition of specific occupational competencies (while recognising these outcomes were appropriate for some) and supported the development of broadly based, pre–employment programs across industry sectors and related occupations.

- VET in Schools was seen as part of a total and integrated learning experience, leading to different pathways rather than immediate entry to a career. Some representatives advocated the option of students only receiving a final qualification after specific workplace competence was demonstrated (particularly at higher AQF levels).

- The multiple and diverse purposes of VET in Schools were recognised. Programs leading to specific industry recognition were seen as one outcome, with broader outcomes seen to be different and distinct from those leading to specific industry and occupational recognition.

- Current guidelines for Training Package development were criticised for not allowing for sufficient specification of workplace experience requirements and for not allowing differentiation between industries, for example where workplace experience was essential due to licensing requirements, health and safety issues and in complex and diverse working environments.

- It was also recognised that, for individual employers, the capacity of individuals to apply skills in a workplace environment and the relationship between technical and employability skills were critical. These expectations were even higher when industrial outcomes were involved or where school students were seen to be receiving qualifications at higher-levels than existing workers but with little or no work experience.

- ITAB representatives expressed concern about the extent to which those responsible for development of VET in Schools programs understood competency based training and cited some examples where out-of-date curriculum modules, rather than units of competency, had been used and where standards had been significantly reorganised to meet school delivery requirements.

- Industry and ITAB representatives strongly favoured partnership arrangements between schools and RTOs to deliver VET in Schools (making the distinction between VET in schools and VET for schools). They expressed frustration at the lack of progress on resourcing cross-sectoral delivery models, and circumstances where schools were seeking to register to deliver VET programs when existing infrastructure and expertise in TAFE institutes was under utilised. These partnerships were seen as essential at higher AQTF levels and in areas where schools are not likely to have existing facilities, resources and staff expertise.

- Perceptions of differing standards and interpretations of AQTF requirements between schools and other RTOs were indicated in areas such as human resource requirements and in concern expressed about the absence of industry involvement in the RTO registration and audit process. The funding problems facing State ITABs (and the uncertain future facing many of them) was highlighted in terms of their capacity to assist in the registration and audit processes and to assist schools to understand Training Packages and industry requirements.

- The wide variation between the States and Territories in their approach to VET in Schools and differing requirements and levels of work placement also attracted criticism.

- While projects seeking to link students' casual and part-time experience with VET in Schools in areas such as retail programs were seen as a positive development, the difficulty of linking these experiences to structured work based training, particularly where casual work was in narrow occupational

areas and without an understanding of industry requirements generally, was highlighted.

These industry concerns have been well documented in a number of previous reports and the reports and submissions to the House of Representatives Inquiry identified in Section 3.1.1.

Union representatives have raised a number of issues which have some consistency with the views expressed in the House of Representatives submissions. Particular concerns included industrial relations issues related to employers using VET in Schools work placements as a substitute for School Based New Apprenticeships, occupational health and safety and appropriate supervision in relation to structured workplace learning, and the level of resourcing required by schools to effectively service VET in Schools programs.

Consultations at a State and Territory level were primarily focussed on issues related to Element One of this project, rather than a detailed exploration of these individual issues. Discussions with representatives of state training authorities, schools authorities and individual schools showed a growing degree of frustration at what they saw as a lack of evidence for these concerns, the low incidence of formal complaints from industry and the continued focus on the quality of VET in Schools through what they saw as multiple and unrelated processes, in addition to the implementation of the AQTF.

In particular, during the consultation process, these representatives emphasised that:

- they sought to comply with the requirements of the AQTF and the relevant Training Package, and that simulated workplace experience and assessment was used where it was provided for under the relevant units of competency. Schools were being judged against requirements that were not specified in Training Packages;

- to the extent that these concerns were legitimate, they applied to institutional pathways generally and not just to schools;

- schools as RTOs were registered and audited under the same conditions and standards as other RTOs;

- a range of models to access resources and expertise in areas where they were not available in schools was highlighted by representatives in all States and Territories;

- clearer advice was necessary on the circumstances in which workplace simulation was appropriate. Further guidelines – together with advice and resources to support schools to develop workplace simulation and to better integrate assessment from work placement with school based learning – was seen as necessary;

- the views expressed by national and peak industry bodies were not expressed locally by employers or, in many instances, at a State/Territory level by industry representatives; and

- employer and industry expectations about outcomes exceeded the content of the relevant units of competency and the relevant AQF level. This point is explored in more detail in Section 3.1.3.

Despite differing views, the consultation process found that both industry and school sectors recognise the need to find ways to improve shared understanding and to resolve existing differences.

3.1.3   Case studies

A comprehensive overview of the case studies of VET in Schools programs is included as Appendix Five. Major findings arising from the case studies are:

- There were strong indications of awareness of AQTF requirements and evidence of the AQTF having an impact on quality assurance systems.

- Outcomes were valued by both students and employers, with positive outcomes overall.

- The primary focus of work placement appeared to be exposure to workplace experience and requirements – 'employability skills' rather than specific competencies. These skills were also highly valued by employers.

- Significant variations in practices were evident between stand-alone and embedded VET programs and these variations contribute to a lack of transparency and add to complexity especially for students and employers.

- There are also significant differences in the approach to, and levels of, participation in structured workplace learning, in relation to workplace learning and specific competency requirements, and the means of assessment and reporting.

- Issues associated with assessment requirements included the basis of assessment (for grading rather than competence and against different criteria than that required in the Training Package), access to Training Packages, human resources issues such as the use of RPL to meet assessor requirements, and access to professional development. Where teachers have completed relevant workplace training units, understanding of CBT is higher and risks are minimised.

- Programs are focussed on overall curriculum relevance and student needs rather than labour market needs and skills shortages.

- Partnership arrangements were well designed and appropriate and were underpinned by the AQTF.

3.2   *Element one – Compliance with the AQTF*

The implementation of the AQTF is the key mechanism for quality assurance and mutual recognition in VET and is the principal treatment for risks identified in the draft ANTA risk management framework.

Section 3.2 of this report investigates the operation of the AQTF in 2002 within the schools sector. It provides an outline of the approaches to registering schools as RTOs and includes a discussion of the level of consistency with the AQTF, including areas of better practice and issues of concern.[13] Where relevant, the discussion also draws on the findings of the project case studies.

In the first instance, we examine whether the State and Territory Registering/Course Accrediting Bodies can be said to be meeting the AQTF standards with regard to the registration of schools under the AQTF and the development of curricula.

Secondly, we examine the audit process and how the AQTF standards for Registered Training Organisations are being applied to schools.

This approach has been adopted because:

- the standards are a transparent and agreed national tool to measure the consistency and quality of audit processes; and

- they enable NQTC members to make judgements on the issues which gave rise to this report with regard to a common set of criteria.

The discussion is in four parts:

- Section 3.2.1 concerns the application of AQTF standards by State and Territory Registering/Course Accrediting Bodies with regard to audit processes and procedures as applied to schools that seek registration to deliver VET qualifications;

- Section 3.2.2 identifies issues regarding the standards for Registered Training Organisations as they apply to schools and in comparison with other RTOs;

- Section 3.2.3 identifies findings arising from the investigation; and

- Section 3.2.4 provides a summary of the findings in relation to this element.

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[13] Appendix One outlines the arrangements for RTO registration within each jurisdiction, including scope of registration granted in terms of certificate levels and industry areas.

3.2.1 **The application of audit processes and procedures as applied by State and Territory Registering Authorities (SRAs) to schools that seek registration to deliver VET qualifications**

SRA responsibility

In each jurisdiction, the State Recognition Authority (SRA) assumes responsibility for its registration and course accreditation decisions, whether they be under delegation or otherwise. See Table 3.1 for the names of SRAs in each State/Territory.

Table 3.1:   State Recognition Authorities in each State/Territory

State Recognition Authorities	
Australian Capital Territory	ACT Accreditation and Registration Council
New South Wales	NSW Vocational Education and Training Accreditation Board
Northern Territory	Northern Territory Employment and Training Authority
Queensland	Training Recognition Council
South Australia	Accreditation and Recognition Council
Tasmania	Tasmanian Recognition and Training Accreditation Committee
Victoria	Victorian Qualifications Authority
Western Australia	Training Accreditation Council

SRAs work together with units responsible for the coordination of VET in Schools in other government departments, with industry bodies, with boards of studies and with RTOs. They work with school RTOs, whether they are Catholic, independent or government. They particularly work to develop an understanding of the AQTF, and the capacity of schools and RTOs generally to understand the requirements for registration and the application of Training Package endorsed and non-endorsed components.

With respect to audit requirements, we are satisfied that SRAs regard school based RTOs in the same way as other RTOs, and they apply the same audit procedures and processes as they would to other RTOs. In some States and Territories, there are arguably more resources applied to the registration and auditing of schools than to other RTOs.

Schools receive the same explanatory materials from the SRAs as other RTOs. Some material has been specifically developed to assist schools in registration, in particular to bridge the understanding of requirements between the school system and the VET system. These materials are consistent with the standards for RTOs

within the AQTF, often reproducing the standards in their entirety. They are also consistent with general registration materials for RTOs.

However, the diversity of approaches employed across and even within jurisdictions for registration of schools and the differences in the way in which VET in Schools programs are organised and delivered, does create a complex and even confusing picture nationally, particularly when different terminology is used. This may contribute to industry concerns about the quality and consistency of outcomes, although it is not clear whether or not these different arrangements make a difference 'on the ground'.

Delegations from Registering/Course Accrediting Bodies

The State and Territory authorities that delegate the conduct of audits to boards of studies (that is, Queensland and the ACT) work closely and cooperatively with delegated agencies.

Delegation from the Training Recognition Council to the Queensland Studies Authority[14] is only for the delivery of Certificate I and II qualifications and the Certificate III in Information Technology. Schools seeking to deliver all other higher-level qualifications are registered by the Training Recognition Council. Auditors are trained by the SRA and are moderated across school and VET sectors. Both the delegated authority and the SRA are aware of their respective roles and responsibilities and work closely together.

In the ACT, the Board of Senior Secondary Studies is required by legislation to register senior secondary colleges. Thus, the registration certificates are signed by the board. However, in all other aspects, audits are conducted by the Accreditation and Registration Council to the same standards and specifications. The two bodies work closely together to ensure this is the case.

Quality system

Under the AQTF, SRAs are required to develop a defined and documented quality system. Most SRAs have conducted their own internal audit of registration and accreditation functions and have put in place corrective action for any non-compliance with established policies and procedure. Many have had a further external audit conducted. These audits are inclusive of arrangements for the registration of schools as RTOs.

Audit teams and technical experts

A criticism with regard to the audit of RTOs generally, and schools in particular, relates to the level of industry involvement in the audit process. While the level of industry involvement seems to be uneven at best, most States and Territories have agreed processes with State and Territory Industry Training Advisory Bodies which

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[14] Delegation was previously to the former Board of Senior Secondary Schools Studies.

determine the provision of industry advice and expertise with regard to particular audits.

Many States and Territories train industry representatives as auditors and fund their participation in regional, State and Territory and national moderation sessions. Clear standards were evidenced for the qualifications of auditors and technical experts and their selection within the AQTF.

However, ITABs and other industry partners are not always able to provide a participant on audits. This will become more difficult as State ITABs manage the loss of Commonwealth funding. It is worth noting that reports from SRAs indicate that participation of industry representatives in an audit generally increases both the industry understanding of the audit process and industry confidence in the process.

Sanctions

In many States, the AQTF has acted as a focus for RTOs to re-examine their scope of operations and reduce the size of their scope. It also offers RTOs the opportunity to consider whether they wish to continue to offer training and assessment services under the AQTF. As a result, many States have reported a significant number of RTOs electing not to re- register, and this includes schools.

There is no evidence that schools are treated any less leniently than other RTOs on the basis that they are schools. Audit reports showed schools having to address findings of non-compliance within the required period of time, and choosing to withdraw qualifications from their scope if they could not meet the standards. Other schools have been required to address significant infrastructure issues, teacher qualifications and industry currency, improvements to their quality management system, version control and record keeping. Assessment and training delivery are significant areas of non-compliance and where improvement requests are made.

Many of these areas of non-compliance appear to be system wide and are no more apparent for schools as RTOs than for other RTOs. There are, however, differences in the type of improvement requests in State systems; for example, there are more requests with regard to business and administrative systems in some jurisdictions than in others, and some States or Territories have fewer assessment-driven compliance issues in than others.

While no school has been de-registered as a result of an audit, there is evidence of schools that have chosen not to proceed with registration as an RTO after an initial desk audit or assessment and to cease delivering the programs of study except where they partner with another RTO.

Risk analysis and management

To varying degrees, States and Territories have implemented risk analysis, including the assessment of the likelihood of risk, and have implemented strategies to address risk issues. High-risk areas in schools are no different than those for other RTOs. They include:

Partnerships

Compared with the standards of the Australian Recognition Framework, the AQTF strengthens the quality assurance of partnership arrangements. Standard 1.6 requires an RTO to have, and to comply with, a written agreement with each organisation that provides training and/or assessment on behalf of the RTO. The agreement must specify how each party to the agreement will discharge its responsibilities for compliance with the *Standards for Registered Training Organisations*.

There is a range of partnership arrangements that schools enter into in order to deliver VET in Schools. These partnership arrangements are predominantly with TAFE institutes, although there is also widespread use of private RTOs. The case studies have confirmed that the trigger for establishing partnerships is often based on student demand for courses which are beyond the capacity of individual schools.[15] In South Australia, schools are actively encouraged to enter into partnerships with TAFE institutes rather than to register in their own right and, in the Northern Territory, smaller schools may enter into partnership arrangements with other schools which are RTOs.

Partnership arrangements vary from the partner RTO taking complete responsibility for training delivery and assessment of school students – either in the TAFE institute, at the school or on-the-job and off-the-job – to the partner RTO taking responsibility for AQTF compliance and the issuing of the qualification or statement of attainment, but with the school undertaking delivery and assessment. The case studies indicated that the latter arrangements are diminishing due to the strengthened quality assurance arrangements with the implementation of the AQTF.

It has been suggested that entering into a partnership arrangement with a TAFE or other RTO is more likely to ensure compliance with the AQTF and the outcomes of a standard acceptable to industry. However, analysis of audits shows this cannot be universally assumed, and that partnerships between schools and other RTOs entail an element of risk unless the partnership is based on a close and ongoing involvement between the school and the partner RTO.

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[15] Such arrangements may assist a broadening of scope, particularly where the partnerships enable students to access suitable equipment and specialist teachers as part of the training program or, alternatively, higher-levels of qualifications such as Certificate III or IV in a specialised industry area.

The case studies confirm that partnerships leading to quality outcomes show a tendency to have clearly defined roles, responsibilities and accountabilities, and close working relationships. Areas of risk are most apparent in those partnerships where some geographic distance exists between the school and the RTO.

Some schools criticised both the cost and the quality of TAFE and other RTO training and assessment services they had been provided with in the past. This has led to schools becoming more discerning consumers of training products and, in some cases, developing their own training product.

Multi-site campuses

Where a school delivers over a range of sites, or is in partnership with an RTO that delivers over a range of sites, the risk of non-compliance appears to be higher, as it is for other RTOs.

As with partnerships, this issue is most apparent in circumstances where distance and isolation erode confidence in the capacity of the RTO to assure that appropriate human and physical resources are in place on a day-to-day basis to support high quality delivery and assessment in vocational education programs.

Rural and isolated schools

Rural and isolated schools may have more difficulty complying, both because of the availability of human and physical resources and the additional demands VET places upon the schools' broader educational programs. On the other hand, these schools often act as catalysts for community participation and the development of partnerships and opportunities in the community.

Workplace delivery

Previous reports and reviews have highlighted quality concerns about aspects of workplace delivery and assessment across all RTOs. Employer commitment, appropriate support materials, and appropriate supervision and workplace conditions are key concerns across all RTO delivery. This becomes a greater risk when looking at wholly on-the-job workplace delivery and training, as identified in the ANTA draft risk management framework. This issue is explored in greater detail in Section 3.2.2.

For schools, the requirements of workplace delivery and assessment are compounded by particular duty of care responsibilities for students.

Resource poor and smaller RTOs

These RTOs are likely to evidence higher instances of non-compliance than other RTOs.

3.2.2 Issues regarding the standards for Registered Training Organisations as they apply to schools and compared to other RTOs

Standard one – Systems for quality training and assessment

Schools that choose or are required to register as RTOs must comply with the quality assurance arrangements of both the schools sector and the VET sector. Policies and procedures may often be tied up in the requirements of the Board of Studies or the schools system, and these often do not meet the requirements of the AQTF.

Some schools have expressed the view that the introduction of the AQTF has improved their systems and made a positive impact on the quality of services provided across the school. It has generated innovation and development by enhancing opportunities for staff and students as they adapt to new and challenging roles, and by promoting an increased awareness and improved relationship with local industry and other RTOs. In this way, VET in Schools may be seen as strengthening the diversity of the schools' programs by extending the range of programs, adding to schools' operations, and giving students a wider range of choice and opportunity. In some cases, this has been to the extent of providing VET courses for mature age students in isolated communities.

The bridging of two systems, however, does place a strain on the resources of some smaller schools and less well funded schools, particularly where they are registered as stand-alone RTOs and have limited opportunities to participate in partnerships or school clusters. These schools may miss out on some of the opportunities from economies of scale and access to specialist facilities and other resources. In general, where a school is able to provide a full-time VET or quality assurance officer, the AQTF requirements are found to be less onerous.

This standard requires that the RTO has policy and procedures to cover all its operations and that appropriate reporting mechanisms are in place. This investigation has shown that documentation requirements were found to be onerous for many schools, and the focus on quality management systems was seen as an organisational model from the business sector, contrasting with the educationally based models favoured by some schools. Others incorporated the requirements into their school based quality assurance systems.

For all RTOs, except those previously quality endorsed under the Australian Recognition Framework, the requirements to self-assess and to put in place risk management procedures are new and may be unfamiliar. This is an area of improvement for schools and for RTOs in general.

Standard two – Compliance with Commonwealth, State and Territory legislative requirements

Schools must comply with a range of legislation that impacts on their ability to effectively offer a complete program of VET in Schools. These requirements include

additional licensing, occupational health and safety and age requirements, and are largely determined by separate legislation in each State and Territory for various occupations and industries. This has always been a challenge for RTOs, particularly with regard to highly regulated trades and occupational health and safety requirements.

A major difference for schools is the perceived differences in duty of care requirements and in the roles and responsibilities of schools to their students, as opposed to RTOs in adult learning environments. For this reason, awareness of potential occupational health and safety issues and risk to the student is high at a State level and in some of the schools visited.

Schools must also meet quality and regulatory requirements for schooling and for VET under the respective legislation in each State, which often informs the division of responsibilities, delegation of powers and models of delivery within VET.

Nevertheless, few concerns are apparent with regard to school compliance under this standard that are not reflected within the broader RTO cohort.

Standard three – Effective financial management procedures

These requirements are usually met effectively within school systems.

Standard four – Effective administrative and records management procedures

The AQTF is very specific in terms of evidence requirements for this standard. For both school and non-school RTOs, there are often many observations against this standard. This is particularly the case for schools where they do not contract their records management obligations under VET to the school system but manage it on their own.

Generally speaking, records management is of a good standard within the schools system, with particular issues around version control. Wherever these issues have been uncovered under audit, or self audit, they have been rectified within the time frame required.

Standard five – Recognition of qualifications issued by other RTOs

Minor non-compliance has been cited against this standard, but mutual recognition is seen as a very positive outcome by schools which are RTOs. The ability to offer an alternative qualification outcome, as in Queensland, and/or multiple qualification outcomes, such as in New South Wales, is seen as a significant benefit for students.

Standard six – Access and equity and client services

VET in Schools programs often have a strong access and equity component. This can be in terms of:

- student choice;

- young people who experience difficulties in engaging in formal education environments;

- young people who experience difficulties in making the transition from school to work;

- rural and remote communities; and

- adult re-entry.

While evidence derived from contemporary research shows that increasingly VET in Schools is taken up by students representing all aspects of socio–economic life, access and equity programs are important interventions in the opportunities for young people while at school. They reflect the MCEETYA principle that requires vocational education to facilitate young people's learning in a variety of settings, including the classroom, workplace or the wider community. This program diversity, valued by both schools and students, coupled with the schools' obligations to offer opportunity to each and every one of its students, is often felt to be under threat by narrower focuses on education for skill shortages, or to meet labour market requirements.

Because of the different relationship schools have with their students (pastoral care versus adult learning), some schools evidence initial non-compliance in areas of client services, such as student handbooks and complaints procedures. It is assumed by schools that students are aware of the services and support available to them. In all cases sighted, non- compliance has been rectified within the required time frame.

Standard seven – The competence of RTO staff

The standard and requirements for the demonstration of qualifications and industry competence of staff is a contested issue within schools. Many school educators feel their industry and life experience and years in school systems is devalued by the quite specific evidence requirements.

Workplace trainer and assessor

The requirement to hold a Certificate IV Workplace Training and Assessment or equivalent has been interpreted in its most literal sense in most States and Territories which have adopted sponsored programs for teachers to acquire the Certificate IV. Some SRAs have indicated concerns regarding the quality of workplace trainer and assessor training provided to schools. This is a wider concern across the VET system where strategic audits of RTOs delivering workplace trainer and assessor qualifications are being held. Where schools have registered to deliver this qualification to their own staff and to other school based RTOs, it may contain a high element of risk.

Further risk is evidenced through the case study findings that indicate a propensity for using portfolio methods to recognise prior learning (RPL) of teachers against the

Certificate IV in Workplace Training and Assessment. When this was encountered, there was an apparent greater risk of a lack of understanding of Training Packages and associated expertise in competency based assessment.[16] This is not an issue specific to schools, as many TAFEs, on adding the Certificate IV in Workplace Training and Assessment to their scope of registration, have provided RPL opportunities to all their staff. The risk of RPL relying on the portfolio method increases when it is assumed that teacher training is sufficient for the RPL of teacher competencies. As the case study overview indicates, assessment has been removed from pre service teacher training for more than two decades. It is generally included within the curriculum and taught by curriculum people.

In some jurisdictions, many teachers have been assessed or are deemed to hold equivalent competencies because of the skills they have developed through the long-standing process of moderated criterion based assessment, which forms the basis of the senior secondary certificate. Although broadly relevant, this background does not necessarily reflect the skills required to make judgements of competency against the prescribed requirements of a Training Package.

More generally, there is a need to increase opportunities for professional development for teachers involved in VET in Schools programs and to review initial teacher education programs to ensure that they encompass VET in Schools provisions and requirements.

Industry currency

As the standards do not specify any guidelines for determining industry currency, variations exist in the interpretations across RTOs and jurisdictions. The case studies showed that expectations varied from school to school and even more so across partnering RTOs and employers. For example, concerns were voiced in one case study about different requirements for maintaining currency for TAFE staff versus school based staff, even though both institutions had RTO status.

Some States and Territories have had industry placement programs for teachers. In recent years, some of these programs have been curtailed due to resource constraints whereas, in other jurisdictions, new programs for teachers are being introduced. In order to adequately deliver vocational education and training, teachers need to be given more opportunities to gain workplace experience and to be recognised for those competencies that they already possess.

In other areas, the case studies demonstrated that, because of the absence of trade qualifications and experience in industry, some schools must rely on others, TAFE institutes or relevant industries to supply both the shortfall in practical experience and the contextual influence that the experience brings to the instruction.

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[16] The case study overview report provides a detailed discussion of this issue. See Appendix Five, p. 26.

There is ample anecdotal evidence that VET in Schools is often driven by teachers with a particular ability, interest or experience in an industry area, and these 'champions' or 'enablers' develop VET within the school. When they leave, the school is often unable to continue offering the VET program to the same level or with the same scope and, if it continues to do so, it may be non-compliant.

Teachers provide evidence of industry currency in a range of ways. Workplace visits and negotiation also represent further on-the-job opportunities for teachers to develop industry knowledge. Some States and Territories encourage teachers themselves to obtain the Certificate II or a higher qualification in the industry area they are teaching.

Generally though, throughout States and Territories teachers are provided with the training and professional development to enable their participation in the VET system and to work with students and industry, work placement supervisors, employers and trainers. However, additional opportunities for teachers to engage in industry placements would be viewed positively by most stakeholders. VET in Schools programs could be greatly enhanced by providing greater opportunities for both teachers and students to participate in structured work placements.

Standard eight – RTO assessments

At Certificate I and II levels, many school systems complete assessments in a school or simulated environment, even when the student is undertaking structured workplace learning. However, it is apparent that this is only when the Training Package allows it. If it is a Training Package requirement, schools are required to provide structured workplace assessment to meet the requirements of the AQTF, and to be registered.

Some schools have excellent assessment materials, both in a simulated environment and for the workplace. There is also evidence of a range of practices that have room for improvement, including an understanding of the role of a subject matter or technical expert in assessment, and the development of skills in competency based assessment versus criterion based assessment. Training and guidance in relation to units of competency, which must be assessed in conjunction with other elements of a given Training Package, may also assist with enhancing rigour in assessment processes.

SRA monitoring material and the experience of auditors indicates that these are system wide issues for VET and are certainly not limited to schools. There is a need for the development of assessment skills, particularly assessment skills in the workplace, but this need is evident across the whole of the VET system. In some States and Territories, schools performed quite highly against this standard when compared with other RTOs.

There are very strong moderating systems that have arisen from the AQTF which are highly valued by teachers in schools and RTOs as a professional development tool, as well as a mechanism for validating assessment strategies. Moderation

systems may provide excellent opportunities for learning and continuous improvement across the VET system, as well as in schools. This has been evidenced in many States.

There are also some particular issues for assessment in schools, including grading and criterion referenced assessment versus competency based assessment, which are discussed below.

Graded assessment

The case studies highlighted the potential for confusion and inappropriate assessment practices to arise when students are assessed for the purposes of grading rather than against the specific competency requirements of relevant Training Packages. Higher education institutions often require graded performance assessment in order to recognise student achievement in VET for the purposes of university entry, and sometimes the push for graded performance assessment comes from employers. Students follow their lead in order to improve their opportunities for further employment and education. For these reasons, many jurisdictions have introduced dual assessment outcomes in some vocational education and training.

Criterion based assessment

In Queensland, students undergo both criterion based assessment for the Senior Secondary Certificate and competency assessment for the VET qualification from the same curricula. Although some excellent examples of assessment materials were provided to confirm the rigour of the competency based assessment, it seems to be an unnecessary requirement given the compatibility of a scored assessment and a competency decision when competency based assessment is based upon the principles of criterion or standards referenced frameworks. The case studies in South Australia, Queensland and Victoria highlighted a tendency for teachers to design separate assessment activities based upon different criteria (generic competencies versus industry specific) to meet the different reporting requirements, which created unnecessary additional work for both teachers and students.

The difficulty with these arrangements is that the different assessment purposes are not understood by industry and, in some cases, teachers themselves. This brings into question the extent of the rigour associated with the VET processes and how the units of competency are being interpreted. This may indicate a need for the two sectors to develop better understandings of each other's processes. It may perhaps also identify, in the long-term, the need for greater transparency of VET outcomes in the curriculum.

Standard nine – Learning and assessment strategies

In some States and Territories, school RTOs are completely responsible for the development and/or purchasing of their own training materials on an individual

basis. However, most States and Territories provide programs developed by the boards of studies.

All VET based curricula are required to be mapped to Training Package qualifications and units of competency, or they are accredited under AQTF arrangements for the accreditation of curricula. In the development of curricula and learning programs, States and Territories demonstrate, to varying degrees, their consultation with industry and industry involvement.

However, at the level of the school as the RTO, the case studies illustrated that there is minimal involvement of industry in the design of training programs or the development of assessment materials or instruments. Furthermore, the case studies also illustrated that where VET is embedded in the curriculum this curriculum may be based on an initial interpretation of the Training Package by the relevant ACACA agency, which may be reinterpreted again at the school level through delivery.

The case studies found that the inclusion of VET in the curriculum through embedded courses has placed an additional administrative and assessment workload on the teachers, particularly in those systems that are using centrally determined curricula, such as the ACT and Queensland. Schools have had to find resources to meet these additional requirements.

The case studies further illustrated that where VET is embedded within the curriculum or where teachers use learning and assessment support materials that has been developed by the ACACA agency in consultation with the ITABs, there is a common tendency for teachers not to refer to the Training Packages once the relevant agency has accredited the course, either as a reference to curricula delivery, or as an aid to assessment. This has created instances where students are unaware that they are participating in competency based training or competency based assessment. This again can contribute to confusion and a lack of transparency in terms of the outcome against the original units of competency.

In addition to affirming the human resource issues identified through the consultations, the case studies substantiated the difficulties which schools face in meeting the equipment requirements of standard 9.4. The difference between school based resources and workplace resources is nowhere more apparent than in the metal and engineering workshops and in the industrial level of the hospitality and catering resources available in schools. School students generally work with very small equipment in school workshops. The lathes, cutting machines and other workshop tools appear to be small-scale models compared to those available in industry or at TAFE. For this reason, there was an imperative for students to gain experience in the workplace in a real setting if no partnership arrangement existed with another provider who has more up-to-date equipment.

Overall, this standard appears to have the highest number of observations and non-compliance requests, and this is consistent for all RTOs, not just schools.

Standard ten – Issuing AQF qualification as and statements of attainment

Under arrangements in some States and Territories, the Board of Studies may issue certificates and statements of attainment on behalf of the RTO. Under these arrangements, issues of non-compliance to this standard are less likely to occur.

Where schools are issuing their own certification, schools were showing evidence of non-compliance in the use of appropriate wording and/or formatting for AQF qualifications, as outlined in the *AQF Implementation Handbook.*

Standard eleven – Use of national and State and Territory logos

This was not a significant area of non-compliance for schools, which was affirmed through the six case studies.

Standard twelve – Ethical marketing and advertising

This was not a significant area of non-compliance for schools, which was affirmed through the six case studies.

3.2.3   Findings arising from the investigation

Compliance versus quality

While a focus on compliance clearly existed as schools and other RTOs registered under the AQTF for the first time, evidence indicates that RTOs in general, and schools in particular, are moving beyond their first audit and using that experience to develop and extend their quality assurance systems. Like other RTOs, a school may find the compliance process useful in improving its systems management in particular but this will not necessarily address underlying industry perceptions and concerns.

The case studies have reinforced this finding, particularly where strong partnership arrangements have been established. In these circumstances, the partnership and each organisation's quality assurance processes are viewed as mutually reinforcing and appear to be a direct result of the requirements of the AQTF.

Scope of delivery

The main difference between the scope of registration in schools and other RTOs is the overwhelming preponderance of Certificates I and II in school delivery across all States and Territories to the extent that, in many jurisdictions where schools are offering Certificate III or above, this is done by another RTO, either a TAFE or a private RTO.

The case studies reflected this position in that the VET in Schools programs are largely confined to AQF levels I and II, with the exception of expansion of scope to AQF level III to cover training in Information Technology.

Moderation

Standard 9.2 requires an RTO to validate assessment strategies by reviewing, comparing and evaluating the assessment process, tools and evidence contributing to judgements made by a range of assessors against the same competency standards, at least annually, and documenting any action taken to improve quality and consistency of assessment. These may be internal processes with stakeholder involvement or external validations with other providers or stakeholders.

This standard has, in many instances, given rise to strong moderation systems involving school deliverers of VET in the assessment practices of other RTOs and across a range of environments and industries. However, for some schools, and indeed RTOs in general, external participation in the moderation process could be encouraged, both to strengthen rigour and aspects of professional development.

In addition, the case studies indicated that, where duplications in assessments arise through embedded programs, there is a tendency in moderation processes for the VET component to be de-emphasised.

This results in a need for moderations procedures to be expanded in the grading or scoring of senior secondary subjects to include processes for competence decisions, particularly for those subjects that have embedded components. Moderation of assessment processes and of audit processes has been most successful in cases where it is shared with other VET providers. It would be beneficial if these systems were resourced and supported in the future.

Complaints and grievances

Within both the standards for SRAs and those for RTOs, clear procedures are required for complaints and grievance. The level of concern expressed in the various reports and submissions analysed in this report is not evident from the formal records of dissatisfaction with particular VET in Schools programs or system wide programs.

It is critical that industry concerns at State and national levels are acknowledged and investigated so that a process is developed which can move vocational education in schools forward and continue to grow the range of pathways and the quality of VET in Schools.

Transparency

The lack of clarity with regard to VET arrangements in some school systems and audit arrangements, including the use of a different set of terms to those applied nationally, can only confuse industry observers and contribute to a lack of a clear understanding of the roles and responsibilities of the school system to its students and the role of VET within general education programs.

Industry and employers need to have a clear understanding of the range of school programs with a VET or workplace component, the role and objectives of each program, and their own role as an employer, workplace supervisor or adviser.

Students and teachers, as advocates for school based VET programs in workplaces, need to have a clear understanding of their role and of reasonable employer expectations.

Industry standards

Schools and other RTOs identify industry standards through Training Packages, usually through received curricula, and only very occasionally as part of the development of their own learning programs. There is an enormous variety of ways in which systems provide support for VET in Schools, with a bewildering array of structures, programs, content, examination and school based and workplace assessment strategies in operation. The one common element that might be expected to be in place is the set of Training Packages and the competency units.

Across the systems, there are selective approaches to the Training Packages in terms of which elements and competencies are included in subjects or whether subjects are stand-alone subjects incorporating complete competency units. Some VET subjects do not use the national industry Training Packages. Instead, State based accredited vocational education and training programs are used.

Furthermore, the case studies illustrated that, where VET is embedded in the curriculum, schools may have difficulties in determining industry standards, particularly in partnership arrangements where the Training Package resides with the RTO and teachers do not use it as a reference point for assessment or moderation purposes.

Industry standards may also be identified at a school through industry consultation with local employers, and through teacher experience and professional development. However, there was almost no evidence in the case studies of industry involvement in program design or assessment material development. Industry involvement in VET in Schools programs is largely confined to the provision of work placements.

Matching of industry skill needs and input with VET in Schools programs

Schools tend to plan VET delivery based on:
- the expertise of teachers;
- opportunities available with local industry and employers;
- student demand;
- student need; and
- the resources available to the school.

The matching of industry skills, needs and priorities therefore tends to occur at a local and regional level.

Some States and Territories, for example Western Australia, are taking steps to more closely align VET programs provided by schools with statewide and nationally identified industry skill needs and priorities. However, when discussing aligning programs to skills shortages, schools emphasise the different and varied roles of VET within a school system for a student cohort of 15–17 year olds. These roles may be:

• as an industry taster;

• promoting choice and a range of pathways for students;

• as an employment pathway; and

• as a pathway into part-time employment opportunities.

Employers have indicated that VET in Schools programs give them the opportunity to contribute to the community and better select the appropriate candidate when they recruit at a later date (to sample future employees).

Schools point to national figures, which indicate the increasing disappearance of full-time work opportunities for early school leavers and the importance of part-time and casual work as a labour market feature for this age group, and question whether the industry pathways are immediately available in their region.

As a policy instrument, VET in Schools has in many communities assisted in creating links and opportunities for industry, students and other community members beyond a simple VET in Schools focus. Programs are also reported to have been successful in contributing to an increase in retention of school students into Years 11 and 12. At a school level, they also appear to be raising the profile of VET as an alternative to the academic pathway.

Training Package outcomes

Most developers of training programs for VET in Schools, whether boards of studies, departments of education or individual schools, are concerned about the differences which are apparent between articulated industry criticisms of VET in Schools programs and the documented requirements of Training Packages. These issues centre on the extent to which workplace training is stipulated or recommended as opposed to simulation, and the number of workplace hours required to demonstrate a particular set of competencies that are in addition to Training Package requirements, and imply a level of competence from school students beyond that outlined for outcomes at Certificate I and II levels within the AQF.

Industry consultation at a State level has indicated that industry itself may seek higher standards in addition to the Training Package requirements. This is often worked out through consultative committees, in developing curricula or policy, but

it does provide a dilemma for the school through the expectation of providing additional rigour to that achieved by other RTOs in training and assessment processes. In this regard, it is useful to set out the characteristics of the AQF levels.

Table 3.2: **Australian Qualifications Framework characteristics for Certificates I, II and III**

Certificate I	Certificate II	Certificate III
Do the competencies enable an individual with this qualification to:	**Do the competencies enable an individual with this qualification to:**	**Do the competencies enable an individual with this qualification to:**
Demonstrate knowledge by recall in a narrow range of areas	Demonstrate *basic operational knowledge in a moderate range* of areas	Demonstrate some *relevant theoretical knowledge*
Demonstrate basic practical skills, such as the use of relevant tools	Apply a *defined range of skills*	Apply a range of *well-developed skills*
Perform a sequence of routine tasks given clear direction	Apply known solutions to *a limited range of predictable problems*	Apply known solutions to *a variety of predictable problems*
Receive and pass on messages/information	Perform a range of tasks where *choice between a limited range of options* is required	Perform processes that require *a range of well-developed skills where some discretion and judgement is required*
	Access and record information from varied sources	Interpret available information using *discretion and judgement*
	Take limited responsibility for own outputs in work and learning	Take *responsibility for own outputs* in work and learning
		Take *limited responsibility for the output of others*

Source: Australian Qualifications Framework

VET in Schools program developers feel that employers are demanding Certificate III outcomes from students undertaking Certificate II, for example in areas such as responsibility, problem solving and skills application. However, the case study findings would suggest that it is the attributes which underpin work readiness and employability which are most valued by employers. Such attributes include a positive attitude which in turn was translated to mean: appearance, punctuality, politeness, communication with workers in the workplace, and a commitment to the kinds of activities that were given during the work placements.

Some VET in Schools programs have been amended to enable employers to attract funding at a Certificate III level, once the student had left school. This has meant that, in some industries, students are being offered an incomplete Certificate II to ensure employer eligibility for funding.

In other areas, students are being offered an incomplete Certificate III in order to address employer concerns with regard to student maturity in the workplace, but to enable the student to gain the technical skills.

Schools feel that industrial relations issues also impinge upon work placements for school students. Some industries experience conflict between union concerns that students on placement will detract from their members' ability to find employment. Some employers are reluctant to take on a school student without a subsidy.

Despite these issues, there is a growing body of evidence that appears to indicate that VET programs for schools contribute significantly to school retention.

3.2.4   Summary of findings for element one

- The previous analysis demonstrates that, through its regulatory influence, the AQTF is having a clear impact in establishing quality structures and systems in which VET in Schools programs are being delivered. There is a noticeable impact within schools of the requirement to comply with the AQTF.

- Specifically:

  o   AQTF implementation for schools is proceeding in all jurisdictions at the same pace as other RTOs, and sometimes at a faster pace;

  o   the same standards and procedures are applied by State Recognition Authorities to schools during audit as to other RTOs; and

  o   schools are required by SRAs to provide the same level of evidence with regard to compliance as other RTOs.

- There is also evidence of compliance issues in relation to:

  o   training and assessment;

  o   curricula design and delivery;

  o   resourcing;

  o   professional development; and

  o   quality management systems.

- Compliance issues in these areas are common across other Registered Training Organisations. For schools there may be particular compliance issues that are more systematic than others and reflect the challenge of the transition to operating in a competency based training and assessment environment. These include criterion based assessment and grading versus competency based assessment, duty of care issues and need to ensure that students are able to experience a wide range of opportunities.

- There are areas of high compliance amongst schools that are also due to the nature of the schools sector. This includes financial management and many areas of record keeping and quality assurance.

- The significant variation in registration and delivery models and terminology creates a complex and, at times, confusing picture nationally with regard to the implementation of the AQTF in schools. This issue should be raised with the MCEETYA Transition from School Taskforce and ACACA agencies to see if agreement can be reached to move to more consistent arrangements across jurisdictions.

- The school experience highlights certain aspects of the AQTF and Training Package guidelines which may need to be improved. Training Packages may need to provide greater guidance to a school environment without becoming so prescriptive as to diminish innovation, flexibility and access and equity.

- Pre- and in-service teacher education programs should be reviewed to ensure that they encompass VET in Schools options and requirements.

- The NTQC should work with education authorities, ACACA agencies, ITABs and other stakeholder groups to address identified areas of risk which have been highlighted through the project case studies. Such issues and possible solutions include:

  o reviewing and further supporting partnerships between schools and other RTOs, where schools that are not registered as RTOs currently undertake full delivery and assessment, particularly in circumstances where distance prevents schools and their partnering RTO from forming close working relationships;

  o improving the transparency of competency standards, their delivery and assessment within school curricula and training programs;

  o achieving greater specificity in AQTF standards and Training Package guidelines related to:

    ▪ competencies which require assessment within a workplace environment;

    ▪ criteria to demonstrate currency and ongoing maintenance of industry experience;

    ▪ the equipment required to support delivery and assessment of competencies, where access to workplaces is not available; and

    ▪ approaches to awarding qualifications related to the AQF Certificate IV Workplace Training and Assessment;

  o clearer specification of human resource requirements, particularly in relation to assessment of competency; and

  o opportunities for greater involvement of industry specialists in the AQTF registration and audit process could be explored as part of this process.

- Regulatory compliance processes will not of themselves address underlying concerns about the quality and value of VET in Schools. A continuous improvement approach and changes to some policies and guidelines are also required.

3.3   *Element two – Workplace learning and assessment*

This section of the report examines the provision of workplace learning and assessment as a component of VET in Schools programs. The discussion draws on the findings derived from the desktop research, consultations and case studies and is in five parts:

- Section 3.3.1 examines the multiple pathways available to achieve VET outcomes;

- Section 3.3.2 explores issues associated with levels of participation in VET in Schools programs and rates of participation in structured workplace learning;

- Section 3.3.3 provides an overview of the nature of work placements;

- Section 3.3.4 centres on the relative characteristics of institution and work based pathways; and

- Section 3.3.5 provides a summary of the findings for element two.

3.3.1   Multiple pathways

The AQF guidelines make it clear that multiple pathways are available to achieve VET outcomes, although these pathways must be consistent with the requirements of the relevant Training Package or accredited course.

Examples of possible pathways include:
- work based training and assessment;
- institution based education and training and assessment (including schools);
- part institution based education and training and assessment (including schools) and part work based training and assessment;
- recognition of prior learning;
- recognition of prior learning combined with further training as required; and
- accumulation of a variety of short courses/training programs.

To ensure that learning outcomes can be flexibly delivered and assessed, a conscious decision was made in the process of developing Training Package policy and guidelines to not separately specify or 'quarantine' work based learning pathways, such as apprenticeships and traineeships, although Training Package developers were able to propose the exclusion of qualifications (for example those at higher-levels) from apprenticeship and traineeships in the Training Package endorsement process.

This policy outcome is reflected in various sections of the *Handbook for Training Package Developers*; for example, in sections dealing with evidence and assessment requirements, and by early decisions of the then National Training Framework

Committee to defer endorsement of some initial Training Packages on the basis that they overly specified workplace assessment requirements or sought to impose industry assessment systems in addition to those used by the RTO. Package developers in a number of industries did not support these outcomes, particularly where long-standing apprenticeship arrangements were in place or where workplace performance and experience were seen as essential to competency assessment, as in the case of the retail industry.

3.3.2 Work placement opportunities

Most VET in Schools provision takes place through the institution based education and training and assessment pathway.

However, the MCEETYA VET in Schools policy makes explicit reference to the desirability of structured workplace learning being an integral component of the VET in Schools program:

> *The post-compulsory years of schooling should also include student access to VET programs that incorporate structured workplace learning opportunities* [17]

In recognition of the benefits this provides for learning and assessment in authentic settings, a range of strategies has been implemented to maximise student involvement in structured workplace learning. These strategies have included:

- the provision of cluster based coordinators through resources allocated by the Enterprise and Career Education Foundation (ECEF);[18]

- resources, liaison and support provided by State and Territory education and training authorities and peak industry bodies; and

- relationships and partnerships which have developed between individual schools and employers.

However, with the sustained growth in student participation in VET in Schools, combined with the introduction of School Based New Apprenticeships and the ongoing involvement of students in work experience programs, the provision of opportunities for students to participate in structured workplace learning is a constant challenge which confronts schools and program coordinators with the potential for employer fatigue and withdrawal of support.

The proportion of students participating in work placements grew from 41.1 per cent of students in 1999 to 52.8 per cent in 2000, 59.6 per cent in 2001 and 60.6 in 2002. This relationship is illustrated in Figure 3.1.

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[17] MCEETYA (2000) *New framework for vocational education and training in schools: policy directions.* The MCEETYA definition of workplace learning, (as listed in the MCEETYA VETIS 2002 Data Collection Survey v.1) should be noted: *Workplace learning comprises learning opportunities that are part of a VET in Schools program and take place in a workplace or simulated workplace.*
[18] Formerly the Australian Student Traineeship Foundation (ASTF).

Figure 3.1: VET in Schools participation and involvement in structured workplace learning
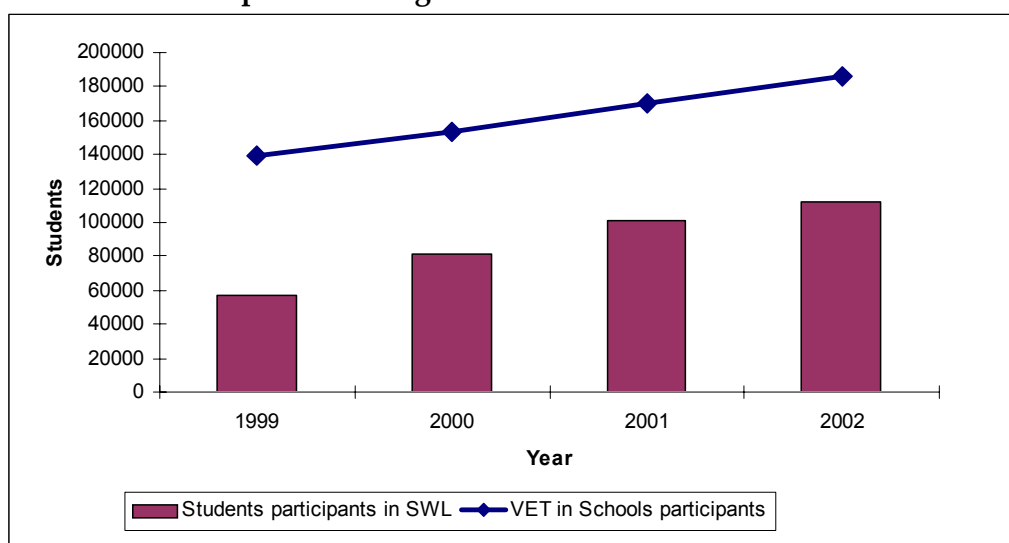
Source: MCEETYA (2003) *Report of the MCEETYA taskforce on transition from schools.*

Whilst the number of students accessing structured workplace learning has increased, this growth has been achieved at the expense of actual time spent in the workplace by those involved. Table 3.3 shows that the average number of hours spent in the workplace by students accessing structured workplace learning has declined from 97.8 hours in 1999 to 65.8 hours in 2002.

Table 3.3:   VET in Schools participation in structured workplace learning 1999–2002

	1999	2000	2001	2002
Students participating in structured workplace learning	57,343	81,047	101,208	112,403
Total hours	5,610,733	6,470,092	7,113,742	7,399,871
Average hours per student	**97.8**	**79.8**	**70.3**	**65.8**

Source: MCEETYA (2003) *Report on the taskforce on transition from schools.*

Data sourced from the ECEF confirms a decline in time spent in the workplace by VET in Schools students. This data shows that most students access 10 days or less per annum of structured workplace learning. Furthermore, the proportion of students accessing 20 days or more of structured workplace learning has declined in from the peak achieved in 2002, as shown in Figure 3.2.

Figure 3.2: **Days spent in structured workplace learning 1999–2002**
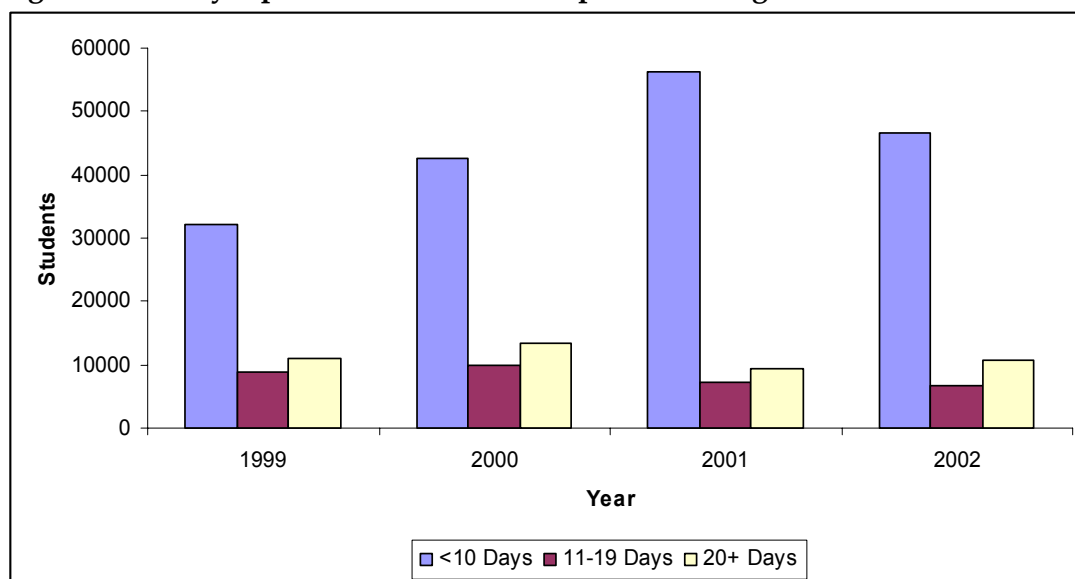
Source: ECEF.

3.3.3   The nature of work placement

The issue of work placement goes beyond the opportunities for participation. As the case studies overview report highlights (see Appendix Five), there are significant variations in workplace learning requirements and practices between the States and Territories. There are also likely to be significant variations within jurisdictions.[19]

The case studies and our consultations suggest that work placement for school students falls into three categories:

- work experience where the primary aim is to give students a 'taste' of work, with the key objective of developing general employability skills;

- work placement on-the-job, where the student will gain skills and knowledge directly related to a VET subject they are taking at school or where skills and opportunities are provided to reinforce skills and knowledge gained at school; or

- school based apprenticeships and traineeships, where the student is an employee under a contract of training, and where there is a direct relationship between their VET subjects and their work, with competence acquired and assessed through a training plan.

Based on our case studies and consultations, it is apparent that, though the full range of work placements is available to students, they predominately experience placements at the work experience end of the spectrum. Outside of school based

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[19] These variations are as summarised in Table 2 contained in the case study overview report based on information gathered during the case studies. See Appendix Five.

apprenticeships, and with the level of intensity of work placement diminishing, fewer opportunities will exist for the full assessment of specific competencies integrating institution and workbased learning. Rather, most students will only gain some initial exposure to general workplace experiences.

As such, there must be a continuing priority to the expansion of work placement opportunities for VET in Schools programs.

Where work placement is integrated with competency assessment, there is also room for improvement. From the case studies it is apparent that, even where work placements occur, employers are not necessarily aware of the nature of the competencies being taught at school, which results in minimal integration of the two environments. The case studies indicated that, regardless of the setting, students do not always have an interest in or an awareness of the competencies against which they are assessed, particularly where VET is embedded in the curriculum.

Employers are more likely to focus on general employability skills rather than industry specific competencies. During the consultation process most industry stakeholders also argued that the primary objective of VET in Schools should be a general preparation for work rather than specific competency outcomes. Furthermore, teachers are reluctant to expect employers to assess students against competencies, believing that such a requirement may be a disincentive for employers to participate in the program.

In our view, the purposes of work placement must be clarified. Where work placement is expected to contribute to competency assessment, students and employers must be aware of the units and performance criteria involved, and appropriate resources for recording experiences and outcomes should be made available. There are a number of examples where simple but effective resources have been developed for this purpose. Where work placement is not related to specific competency requirements, this should also be clear, with simulated work placement arrangements used as an alternative.

The challenge of finding appropriate work placement is even more complex where a student is involved in more than one VET in Schools program in areas that may not be closely related or in 'embedded VET' programs where the specific competency requirements may not be clear.

The need for students to have made some progress towards understanding and acquiring general employment competencies was also identified in the case studies, and it is noted that some States and individual schools already require general competencies in this area to be acquired prior to students participating in a work placement. There is a case to introduce a more consistent approach across jurisdictions in this regard, either through the development or identification of specific competencies or through an accredited course.

All stakeholders in the consultation process recognised that many of the issues and challenges raised above are not confined to schools alone. In fact, during the

consultation process, it was suggested that schools were more aware of and committed to work placement requirements than many other RTOs because of their sensitivity to issues concerning the quality of outcomes. Though not diminishing the importance of the issue for schools, it is apparent that the challenge of accessing workplaces for delivery and assessment is an issue which is experienced generally across all forms of institutional VET delivery.

However, most significantly, the case studies highlighted that students and employers report a positive outcome and an overall satisfaction with the work placement, even when it is focussed more on work experience than learning and assessment against specific competencies – in fact, it is reasonable to infer that it is the general experience that students are looking for and employers are seeking as a means of assessing potential employees. This provides a strong foundation to more clearly focus the purpose of work placement for most VET in Schools participants.

3.3.4 Institution and work based pathways

The case study findings are consistent with some of the concerns raised by industry groups identified earlier in this report in terms of the nature of work placement and the extent to which students are being assessed against Training Package competency requirements. However, it must be emphasised that most Training Packages allow for simulated workplace assessment; that is, work placement is not necessarily required in the Package, and workplace assessment is not the only means of assessing competence.

In these instances, alternative arrangements simulate workplace environments and may be used where allowed for by the Training Package.

Although the use of simulations is not necessarily confined to institutional pathways in schools, in our view, there is an underlying problem in perceptions and understanding of competency outcomes and the extent to which these outcomes can be achieved through institution versus work based pathways. It is significant that this point has been recognised by all industry and ITAB representatives involved in the consultation process.

The issue is thrown into sharper relief in school systems because of the significant adjustment schools must make to meet AQTF requirements and a range of other interconnecting complexities, including:

- the multiple objectives (other than industry recognised outcomes) of VET in Schools;

- the age of students involved (which is exacerbated by proposals to offer VET programs to even younger age groups);

- the wide variations between jurisdictions in the provision of School Based New Apprenticeships and in the level and intensity of work placement; and

- the diverse ways in which VET in Schools is offered, delivered and certified.

Employer expectations of what is signified by competence and the value placed by industry on employability skills and the relationship of these skills to age and experience adds further complexity to the issue.

This conclusion is consistent with the review of *The AQTF and VET in Schools* report, which concluded that:

> *However, a deeper issue is whether qualifications gained through institutional delivery (especially a school) are as highly valued by employers as those gained through delivery which is largely workplace based. This question is far more difficult to answer.*[20]

It is also consistent with a review of the delegation to the then Queensland Board of Senior Secondary School Studies by the then Vocational Education and Training and Employment Commission in Queensland by Noonan and Maxwell who made the following observation on the submissions received for the review.

> *A further issue raised in the submissions was the question of whether VET in Schools programs are delivering the same competency outcomes as workplace training programs. This is actually a specific instance of the more general issue of equivalence of outcomes between institution based programs and work based programs. In view of the increased focus on quality and consistency of outcomes under the National Training Framework, this warrants national attention. On this issue, there is a clear and persistent undercurrent evident from discussions with industry groups that outcomes are not seen by them to be identical across pathways involving substantially different learning experiences.*[21]

This issue has also been the subject of previous reports, including a major project undertaken by the then South Australian Department of Education and Training, *Implementing Training Packages through institutionally based training*. The project produced an overview report, which canvassed many of the issues now under debate in relation to VET in Schools provision.

The report identified the extent to which 'skill maturity', gained through practised performance of skills and knowledge in a range of contexts, was a determinant of competency to be obtained through the VET system as opposed to employment alone. The report concludes:

> *Although the context for assessment specified in Training Packages is in almost all cases either an on- or off-the-job environment, the language of competencies is expressed in workplace terms.*[22]

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[20] Queensland Board of Senior Secondary School Studies, *The AQTF and VET in Schools: A report to the National Training Quality Council*, February 2002, p. 13

[21] Maxwell G and Noonan P *Review of the delegation for VET in Schools for the Training Recognition Council to the Queensland Board of Senior Secondary School Studies*, School of Education, University of Queensland Brisbane 200i, p. 13.

[22] South Australian Department of Education and Training *Implementing Training Packages through institutionally based training Undated* p. 5.

Training Package guidelines unambiguously indicate that competence is defined in terms of workplace performance outcomes, and the AQF Certificate, Diploma and Advanced Diploma levels are derived by reference to factors such as level of responsibility, contingency and task complexity. It is therefore not surprising that industry groups look to evidence of the *context* within which skills have been acquired and assessed, that is, the pathway as well as the *outcome*.

As the issue of work versus institution based pathways in terms of competency attainment is a broader issue than just VET in Schools, it is most appropriately dealt with through the current review of Training Package guidelines. A more fundamental assessment of the underlying issue of the achievement of competency outcomes through institutional pathways is required. Options raised during the consultation process include greater differentiation between work and institution based pathways, and requirements for competence to be certified only after a period of work placement or employment. These options should be addressed in the current review of Training Package guidelines.

A scoping paper prepared by Oval Research for that review has significant implications in that discussion. The paper indicates that:

> *Knowledge work is very different from knowledge as traditionally understood. It is produced at work, is high in use-value, is often context specific, and is short lived. It is less foundational or disciplinary and is rarely the product of individuals but arises through collaborations and networks that exist within specific sites and particular contexts.*

> *This working knowledge is also rarely codified in text books, formal training programs, competency standards, or procedural manuals. Instead, it is developed within the context and environment of the immediate workplace from the base of relevant skills and knowledge, including technical knowledge, held by workers.[23]*

The implication of this research is significant as it implies that the nature of, and outcomes from, work based learning may be fundamentally different from that which is possible from institution based pathways, even those involving workplace simulation. It may explain why there are different perceptions of outcomes between the various parties involved in the development and provision of VET in Schools, between those who have a primary focus on the workplace application of competencies which were developed for that purpose and those who see workplace competence as only one of a number of possible outcomes. Both perspectives have validity; the problem arises when they are both trying to use the same product for different outcomes and in very different contexts.

However, during the consultation process we also found widespread support for the development and provision of a new suite of qualifications that would have a

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[23] Australian National Training Authority *High-level review of Training Packages. Phase 1 report An analysis of the current and future context in which Training Packages will need to operate,* ANTA 2003. http://www.anta.gov.au

primary focus on the preparation of young people to enter the workforce, rather than on the assessment of students against highly specific work related competences that were designed for the purposes of occupational retraining and upgrading or are best accessed by young people through apprenticeship and traineeship pathways. Some ITABs indicated that is a range of existing competencies – some at higher-levels – that could be provided as part of these qualifications.

There was also general agreement that most students would benefit from programs aimed at development of general employability skills and, from our case studies, these outcomes were also most valued by employers.

In our view, there is a great deal of common ground between the parties involved in the development and provision of VET in Schools programs and considerable value placed on the current program. This common ground is obscured by concerns over whether or not the same outcomes are being achieved.

A regulatory compliance model will not address this problem, which represents a substantial and growing risk to the perception of outcomes. A different approach is required which works from the basis of what is achievable, valued and will contribute to employment and further learning, rather than continuing to force fit programs into a regulatory and quality assurance framework which was originally designed for different purposes.

We do not support suggestions that new forms of provision should sit outside of the AQTF and only form part of senior secondary certificates; rather, the framework should be sufficiently flexible to accommodate work and vocationally related learning in different contexts and forms. The key is to ensure that students, parents and employers are clear about the signals represented by different qualifications.

The development of a range of new qualifications should not preclude schools from offering other Training Package qualifications where they have the relevant scope of registration and are able to effectively integrate work and institution based learning or the continuing expansion of school based apprenticeships and traineeships.

3.3.5 Summary of findings for element two

• Work placement opportunities for VET In Schools are significant and expanding but not at a rate sufficient to ensure that most VET in Schools students will be able to access work placements for effective workplace learning and assessment. Work placement requirements and levels of provision vary between jurisdictions.

• Competency requirements may not always be understood by employers and students. The purposes of work placement should be clarified. The majority of work placements are probably associated more with general workplace orientation and employability skills, rather than learning and assessment associated with specific competencies.

- Information for employers and students and workplace assessment resources should clearly outline required competency outcomes where these outcomes are to be assessed.

- Training Packages should more clearly specify the conditions in which workplace simulation is appropriate and where workplace assessment is required.   There should be greater flexibility in the Training Package development and endorsement process to allow for variations between industry requirements.

- Models and best practice for institution based VET pathways should be developed, for example, building on the recommendations, findings and industry case studies in the report *Implementing Training Packages through institutionally based learning.*

- New programs which more closely reflect the range of actual practices in schools should be developed. These programs would have a primary focus on preparing young people for entry to the workforce. To have credibility and industry recognition they should have an industry focus based on broad skill groupings, such as those recently endorsed by the ANTA Board. In these programs, work placement could provide a context for the application of some skills, but its primary focus would be the development of general employability skills and an understanding and appreciation of the workplace environment.

- These programs should be offered under the AQTF, lead to AQF outcomes and be clearly linked to other Training Package pathways that are more appropriate when the student has opportunities for more structured and intensive workplace experience.

- The development of a range of more broadly based programs aimed at employment entry should not preclude schools from continuing to offer existing Training Package qualifications, where they have the scope of registration and arrangements with employers to provide opportunities for integrated work and learning or through the continuing growth in school based apprenticeships and traineeships.

3.4 Element three – Current and future provision of VET in Schools

This section of the report evaluates the coverage of VET in Schools programs in regard to identified labour market demand and skills shortages. The discussion is in three parts:

- Section 3.4.1 provides an overview of the availability of VET in Schools program areas as they relate to industry segmentation, Training Package implementation and qualification levels;

- Section 3.4.2 considers the range of outcomes achieved through VET in Schools programs beyond those which focus on labour markets and skills shortages; and

- Section 3.4.3 provides a summary of the findings.

3.4.1 Program areas available by industry, Training Package implementation and level of qualification

Data available to date indicates that VET in Schools provision centres primarily on tourism and hospitality, business and clerical and computing industry areas. Table 3.4, derived from the MCEETYA Taskforce on Transition from Schools report, shows a high concentration of VET in Schools programs in these areas.

Table 3.4: Enrolments in VET in Schools programs 2002 by ANTA industry groups for government and Catholic schools

ANTA industry area	Proportion of coverage
Tourism and Hospitality	19.7%
Business and Clerical	16.0%
Computing	15.4%
General Education and Training	10.7%
Engineering and Mining	6.2%
Arts, Entertainment, Sports and Recreation	6.2%
Building and Construction	4.6%
TCF and Furnishings	4.0%
Sales and Personal Services	3.7%
Community Services, Health and Education	3.7%
Other	9.8%

Source: MCEETYA (2003*) Report of the taskforce on transition from schools.*

Consultations with State and Territory training authorities, schools sectors, curriculum and assessment authorities and other stakeholders reveal a consistent pattern in the factors which influence VET in Schools provision. These factors

include supply-side influences at the school level, as well as internal and external demand influences:

- *Student demand* – As a generalisation, many students use VET in Schools as a 'taster' activity. The students are not necessarily predisposed to a particular industry as a career path, rather they use the VET in Schools program as a low risk means of seeing what a particular industry has to offer in terms of career options. For every student who reportedly develops an interest in a given industry, others are reported to have a reduced level of interest as a result of experiencing vocational education and training related to the same industry.

  Other students enter into VET in Schools programs in order to develop competencies and secure qualifications as a means of gaining entry into labour markets, not for the purposes of a long-term career but rather to gain access to an income while they pursue further education and training, travel or other employment options. A high proportion of students involved in hospitality training are reportedly motivated in this way.

  For other students, VET in Schools offers the opportunity to pursue an interest which centres on a labour market outcome. For these students, participation in VET in Schools programs is focussed on a particular industry area with a view to continuing with additional training or employment in the same area on completion of schooling. Such students are often motivated to take up a School Based New Apprenticeship.

- *Human resources* – Schools and registration authorities that were consulted suggested that this supply-side factor, though still important, is less of an influence on the provision of VET in Schools than it may have been in the past. Through the implementation of the AQTF, schools as RTOs are highly conscious of the need to align scope with appropriate levels of human resource capability. As a consequence, when key teachers relocate or take leave, there is a strong propensity for schools to enter into partnership or auspicing arrangements with other RTOs.

  Many stakeholders recognise industry currency as a major issue requiring clarification and specific guidance. Though many schools take a proactive stance in this area and self regulate VET offerings, many argue that VET in Schools continues to be compromised by the costs associated with sustaining industry currency for teaching staff.

- *Infrastructure* – As with human resources, AQTF requirements ensure that schools do not undertake VET in Schools programs where the absence of equipment, technology and other resources precludes delivery and assessment to industry standards. Registration bodies consulted reported a number of instances of scope reduction and schools opting for alternative arrangements in order to meet infrastructure requirements.

- *Labour market demand and skills shortages* – Education and training authorities and schools are less clear about the extent to which these demand side factors

influence the provision of VET in Schools. However, at a local level, schools readily articulate clear links between VET in Schools provision and the needs of industry. This is particularly apparent in regional areas where local industry and community capacity building initiatives are seen as the major influences on the availability of structured workplace learning.

In most jurisdictions, the scope of schools as RTOs is limited to AQF Level II certification, with some schools opting (based on human resource and infrastructure capability) to only deliver elements of qualifications rather than full certificates. Exceptions to this generalised view relate to:

- the provision of information technology to Certificate III and, in some instances, Certificate IV, by schools as RTOs or in partnership with other RTOs;

- the provision of a range of VET programs to Certificate III in Queensland through partnerships with other RTOs;[24] and

- isolated examples of other provision to Certificate III where local human resource or infrastructure capability and relationships with other providers or industry enable discrete programs to evolve.

Existing and planned levels of VET in Schools delivery

Table 3.5 shows the relative share of enrolments in VET in Schools and commencements in School Based New Apprenticeship pathways.

Table 3.5: Comparative enrolments by industry in VET in Schools programs and School Based New Apprenticeships

Industry	Percentage share VET in School	Percentage share School Based New Apprenticeships
Tourism and Hospitality	19.7	15.6
Business and Clerical	16.0	12.2
Computing	15.4	2.1
General Education and Training	10.7	0.7
Engineering and Mining	6.2	4.0
Arts, Entertainment, Sports and Recreation	6.2	1.6
Building and Construction	4.6	3.4
TCF and Furnishings	4.0	1.6
Sales and Personal Services	3.7	10.3
Community Services, Health	3.7	2.5

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[24] Schools in Queensland are only able to offer stand-alone programs within their scope as RTOs to AQTF Level 2.

Industry	Percentage share VET in School	Percentage share School Based New Apprenticeships
and Education		
Primary Industry	3.4	7.4
Automotive	2.5	6.5

Source: MCEETYA (2003) *Report of the taskforce on transition from schools.*

Both the ANTA submission to the House of Representatives Inquiry and the MCCEETYA Taskforce report highlight the extent to which provision is dominated in three main industries or occupations: tourism and hospitality, administration and information technology. A fourth category, general education and training, though quite high, is a broad category encompassing job seeking skills, personal development, workplace communications and health and safety and, as such, is not directly related to an industry sector or occupation.

The table clearly reflects the retail sector's preference for work based pathways. However, even when New Apprenticeship numbers are combined with VET in Schools participation data, the proportion of involvement in retail is still low in comparison to other industry sectors.

There are also significant variations in the pattern of provision between the States and Territories. For example, retail provision represents 9 per cent of enrolments in New South Wales compared to 1.4 per cent in Victoria, whereas provision in arts, entertainment, sport and recreation represents almost 20 per cent of provision in Victoria compared to 2.2 per cent in New South Wales. Queensland has an unusually high-level of provision in two industry areas – engineering and mining (8.4 per cent) and TCF and furnishings (6.8 per cent) relative to all other States. General education and training in Queensland (21 per cent) and Western Australia (34 per cent) is also extremely high, particularly compared to New South Wales and Victoria where there is no provision in that category.

These variations make national data analysis highly problematic, suggest the possibility of major inconsistencies in the classification of programs and point to the need to expedite the process of data reporting against AVITMISS standards.

These variations cannot be explained by labour market conditions. They are more likely to reflect the pattern of course development and school facilities and resources than conscious and planned provision based on industry need and labour market analysis. The availability of work placement opportunities will also influence patterns of provision. Our consultations indicated that, in most jurisdictions, planning for VET in Schools provision does not form part of the broader State VET planning process, although many schools seek to meet local employment needs, particularly in rural and regional areas.

The case studies findings add further weight to this view. That is, although one of the schools highlighted the direct link between skills shortages and associated labour market demand in the engineering field and the subsequent introduction of a school based apprenticeship program in engineering, the remaining programs were reported to be derived through other factors. Within the six case studies, these factors have included student demand and the resources (human and training infrastructure) available to the school.

The extent to which VET in Schools provision meets industry and student need in terms of industry and occupational outcomes can be assessed by looking at two criteria:

• the extent to which patterns of provision reflect young people's patterns of labour market participation in different industry sectors; and

• the extent to which VET in Schools provision reflects likely areas of occupational growth and skills shortages.

It is not suggested that there should be a precise alignment between VET in Schools provision and these factors but that, as VET in Schools develops and matures and forms an increasingly important part of broader VET provision, these and other factors should more strongly influence the pattern and that development.

VET in Schools provision and labour market participation

The *ANTA Annual National Report for 2001*[25] outlines the age distribution of employed persons by industry using May 2001 ABS data.

The report highlights the extent to which 15–19 year old employment contributes to overall employment in retail (24.7 per cent), hospitality industries (14.6 per cent), and culture and recreational services (11.2 per cent). This reflects the high-level of casual and part-time employment and the relative ease of access to employment by young people in those industries.

In addition, business or office administration and information technology skills are used across industries and are key elements of broader employability skills. By way of contrast, 15–19 year olds have relatively low levels of employment share in manufacturing (3.8 per cent), construction (5.3 per cent), agriculture, forestry and fishing (5.6 per cent), transport and storage (2.3 per cent) and health and community services (2.6 per cent). While VET generally is a major or growing provider of skills to these industries, VET in Schools provision is quite low.

In summary, current patterns of VET in Schools provision are consistent with the high youth employment profile in the hospitality industry and with the demand for administration and information technology skills across all industry sectors. Provision is significantly lower than the relative share of 15–19 year old employment in the retail industry and, to a lesser extent, in arts, sports, culture and

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[25] Australian National Training Authority *Annual National Report 2001* ANTA Brisbane 2002

recreation. It is lower in other industries where VET is also a major or growing provider, but not significantly so. Participation by 15–19 year olds in other non-school VET programs must also be taken into account in making these assessments.

However, there are significant changes in the age profile of employment in and across industries amongst older age groups compared to that for 15–19 year olds. These changes are evident even between the 15–19 and 20–24 age groups, as young people move into longer-term career paths. For example, 20–24 year olds comprise 10 per cent of employment in manufacturing, 10.7 per cent of construction, 8.1 per cent of transport and distribution, 11.4 per cent of property and business services, 18.6 per cent in hospitality and 15.8 per cent in retail.

VET in Schools provision does not reflect the more typical patterns of age participation in employment across industry sectors. If participation in VET in Schools programs influences young people's career and post secondary educational choices, current patterns of provision would appear to be too narrowly concentrated. This problem will be exacerbated if increasing numbers of young people stay on at school and undertake VET programs based on those current patterns of provision. These patterns may reflect employer preference for more mature workers in some industries, such as health and aged care and transport and distribution, the impact of the regulation of occupational entry in some industries and past patterns of industry development and employment growth.

The most recent *Job Outlook* publication prepared by the Department of Employment and Workplace Relations summarises future employment growth projections across industry sectors. The *Outlook* indicates that seven industries account for 90 per cent of projected employment growth, as illustrated in Table 3.6.

Table 3.6:   Projected employment growth 2003–2008

Sector	Projected growth
Property and business services	28 per cent
Retail trades	19 per cent
Health and community services	14 per cent
Accommodation, cafes and restaurants	8 per cent
Education	7 per cent
Construction	7 per cent
Personal and other	6 per cent

Source: Department of Employment and Workplace Relations (2003) *Job Outlook.*

The *Job Outlook* also lists a number of areas of skill shortage, including tradespeople in the metals, automotive, electrical/electronic, food, wood and other trades and occupations.

While VET in Schools provision is strong in some of these industries and occupations, there are also major areas of relative 'under provision' based on

projected labour market need and opportunity, particularly in areas of existing and projected skill shortages.

A number of areas of skill shortage have been the subject of recent industry skills initiatives commissioned by the Department of Education Science and Training (DEST).

An overview report prepared by DEST, *The nature and causes of skill shortages: Reflections from the Commonwealth National Industry Skills Initiative Working Groups*, concludes that:

> *A second lesson learned is that while apprenticeships are a major source of skills in the traditional skilled trades, there has been an increase in other pathways involving vocational education outside of the apprenticeship system in recent years. Some of this relates to new traineeship arrangements, and some relates to VET courses outside of the new apprenticeship system altogether. These alternative pathways now rival the traditional apprenticeship system in some cases, especially where licensing or regulation requirements are not an issue.*[26]

However, current patterns of provision of VET in Schools will limit the extent to which VET in Schools pathways will assist in redressing skills shortages. Indeed, the fact that industry concerns are most pronounced in traditional apprenticeship areas and in the retail sector is likely to lead to schools staying out of, or even reducing provision in, these areas. This will lead to a self-perpetuating outcome, where the current imbalance in provision becomes entrenched, and opportunities for young people to enter industries and occupations in areas of employment growth through VET in Schools pathways remains limited.

The DEST report goes on to say:

> *Perhaps the most important lesson learned is that despite some of the issues being generic across all or most skilled occupations, the solutions and plans for action really need to be tailored and customised to the conditions applying in particular industries and occupations. For example, most industries felt that the skilled trades had an image problem in terms of their appeal to young people thinking about potential careers. All industries felt a bias on the part of school parents and the media towards university education and the professions. Yet each industry has proposed some quite different specific measures to tackle these issues in their industry.*[27]

The report also makes the important distinction between skills shortages – the level of job vacancies for specific occupations, and skills gaps – the specialised knowledge and experience to undertake particular tasks and to adapt to changing requirements. This distinction emphasises the importance of 'employability skills' and of underpinning skills and knowledge within and across industry sectors.

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[26] Department Education Science and Training, *The nature and causes of skill shortages: Reflections from the Commonwealth National Industry Skills Initiative Working Groups*, November 2002, p. 1
http://www.skillsinitiative.gov.au/documents/Skill_Shortages.doc p.1
[27] DEST report, p. 1.

As previously indicated, VET in Schools provision is limited in some industry sectors due to:

- actual or perceived requirements for work placement and limitations on work placement opportunities;

- the difficulty of attracting and retaining suitably qualified staff;

- the cost of facilities and the availability of learning resources;

- the cost of purchasing provision from other RTOs where the school lacks scope to deliver and assess;

- student and parent perceptions of some industries;

- occupational health and safety and duty of care issues; and

- concerns about negative industry reaction to possible VET provision through schools.

It is unlikely that programs will be extended to most areas of current under-provision through schools operating as stand-alone RTOs, or even through school clusters, due to the constraints summarised above. In many instances, partnerships will be necessary with other RTOs with existing scope of registration and with industry, particularly where competence can only be achieved in workplace environments and where specialised facilities, equipment and staff are required.

Our consultations highlighted frustration by all stakeholders at the barriers – particularly resourcing issues – that seem to preclude the development of effective partnerships between schools and other RTOs.

As such, greater priority should be given to the development of effective partnership models. These models should be driven by the principle that resourcing should support students' choices and pathways and not be determined by sectoral boundaries.

3.4.2   Other outcomes

The brief for this project also asked for an assessment of other outcomes from VET in Schools programs, including entrance to tertiary education and employer and student satisfaction.

In relation to tertiary entrance, most jurisdictions have in place processes to incorporate outcomes from VET in Schools courses for the purposes of calculating tertiary entrance scores, although progress is uneven. The extent to which participation in VET in Schools contributes to senior secondary school certificates in each jurisdiction varies across the States and Territories, including contribution of VET in Schools to tertiary entrance scores.[28] Our case studies and consultations also

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[28] At a simplistic level, in calculating tertiary entrance scores all States and Territories, except Western Australia and Tasmania, include stand-alone VET courses, and Western Australia is currently examining ways in which VET may be incorporated into tertiary entrance in the future. However, the

highlighted something of an ambiguous attitude to this process, in particular where provision and assessment varies to achieve a tertiary ranking, and where programs are changed to the extent that students who are not seeking a tertiary entrance score are required to undertake assessment tasks that are not essential to achieve the Training Package competency outcome.

This issue is bound up in the broader debate about the interface between competency based training and higher education program requirements and is not assisted by the lack of internal coherence in the Australian Qualifications Framework descriptors. For example, VET sector qualifications derive their level from both content and occupational responsibility, derived as they were from the former Australian Standards Framework. Higher education qualifications relate primarily to bodies and knowledge, with very general references to employability skills that are not necessarily related to occupational hierarchies. Senior secondary certificates are described differently, again in terms of preparation for further study, the workforce and other life roles. But VET qualifications, which extend beyond workforce preparation, are often embedded in senior secondary qualifications and count for the purposes of tertiary ranking within a senior secondary certificate.

Inevitably, there are differences in terms of what is achievable through VET in Schools pathways. For example, students can be working at advanced cognitive levels in areas such as information technology, accountancy, legal studies, business related maths and at high performance levels in the visual arts, music and sport and in written and verbal communication, but not in workplace contexts and roles that are consistent with the relevant AQF descriptors[29].

This situation also highlights the need for the parties involved in the development and provision of VET in Schools to be given the opportunity to develop programs with outcomes that lead to both further study at a higher-level as well as industry and occupational outcomes. Adjustments should then be made to regulatory frameworks and guidelines to accommodate these pathways, rather than force fitting programs into existing frameworks.

Higher education institutions could also be invited to participate in these processes, with the objective of negotiating tertiary pathways and credit transfer arrangements proactively rather than 'retro fitting' programs developed independently in the sectors. The development of cross-sectoral, industry recognised and supported qualifications would contribute significantly to the recognition of VET in Schools programs by universities.

It is not possible in a study of this duration, or from existing data sets, to identify labour market outcomes or further study pathways for VET in Schools participants.

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extent of inclusion is often limited to a discrete set of offerings which may vary from one jurisdiction to another. Source: http://schoolvet.info/university

[29] This point is no better illustrated by the fact that the AQF website is maintained by students from a senior secondary school!

Our consultations and case studies certainly suggest that VET in Schools is playing an important role in raising levels of educational participation in broadening the range of offering for secondary school students. Of itself, this is likely to improve labour market outcomes and post-secondary educational participation.

The case studies found high general levels of student and employer satisfaction with programs involving work placement and, although only a small sample, this is consistent with other research.

In our view, an ongoing longitudinal survey is required to effectively monitor outcomes and to inform ongoing policy and program development.

3.4.3   Summary of findings for element three

- The current pattern of VET in Schools provision assessed against patterns of labour market participation, employment growth and skills shortages can be seen as an emerging risk. Current processes for planing and development of programs and delivery arrangements will not address this risk.

- Greater priority should be given to the development of learner centred partnership models, and to overcoming barriers to the development of partnerships.

- Resourcing barriers to effective partnerships must be addressed based on the principle that resourcing should support learner centred and driven pathways.

- A more strategic approach is required to provision in industries where VET in Schools is low relative to projected employment growth, skill shortages and economic and social factors.

- The NTQC should affirm the importance of diverse pathways, including those potentially available in schools, and with the MCEETYA Taskforce, explore new ways to more actively engage industry in the development of these learning pathways and organisational delivery models outlined in the findings for element two. Priority should be given to those industries experiencing high-levels of skills shortages and those with high-levels of projected employment growth.

- These arrangements should also include the development of post school educational pathways across the post compulsory education sectors, including universities.

- An ongoing longitudinal study of outcomes from VET in Schools programs should be commissioned.

4   Conclusion

The primary objective of this project was to identify industry concerns about the quality of VET in Schools and to establish whether or not those concerns were well founded.

In relation to the implementation of the AQTF, we found no evidence that the processes and procedures applying to schools were of a different or lower standard than those for other RTOs, although the differences between the States and Territories in terms of delivery and registration models creates a complex and potentially confusing picture.

Our analysis and case studies have identified a number of areas of partial compliance or non-compliance with the AQTF standards, particularly in relation to assessment where VET subjects are embedded in broader school curricula or where assessment is primarily for grading and tertiary ranking. The extent to which partial compliance or non-compliance in schools is higher than for other RTOs is difficult to judge and reflects the ongoing adjustment schools are making to the competency based training and assessment environment they provide, as well as the different and multiple purposes VET in Schools serves compared to VET provided by other RTOs.

The level of work placement opportunities associated with VET in Schools, while increasing in terms of numbers of students, is diminishing in intensity and is not likely to keep pace with overall increases in VET in Schools. Work placement is more likely to be associated with general work experience than workplace training and assessment associated with specific units of competency.

While limitations in the provision of work placements and the nature of activity which occurs within the placements may be an issue, most Training Packages allow for workplace simulation as a legitimate means for assessing competence. This situation is equally prevalent in all RTOs, and it can be argued that there is a more systematic focus on the provision of work placement in schools than for other RTOs.

However, a more pressing issue is the extent to which the same outcome can be achieved through different pathways, particularly as competencies are written in terms of workplace performance. This underlying policy issue should be addressed in the current ANTA Higher Level Review of Training Packages.

The current pattern of VET in Schools provision is skewed to a relatively small number of industries and occupations and will not make a contribution to employment pathways in areas of occupational growth, skills shortages and strategic economic importance based on current delivery models and program guidelines unless specific measures are put in place to do so. However, this concentration of provision does occur in areas of high youth employment and skills usage.

Our case studies found that VET in Schools experiences, particularly those which include work placements, are highly valued by both students and employers. Such programs broaden the opportunities for students and are making a significant contribution to school retention and consequently to post school education and training participation rates. The extent of this contribution can only be fully assessed with more comprehensive research, which should include the collection of longitudinal data.

What we have found therefore is a complex, and even contradictory, picture. This is largely because expectations vary between the stakeholders. National industry groups, including Training Package developers, place a primary emphasis on the quality and integrity of the certification of competence where the student is enrolled in a Training Package qualification. By contrast, schools, education authorities, parents and even many local employers are using VET in Schools for other specific and broader purposes, including workplace induction, recruitment and to broaden the number of upper secondary education options available to young people. In that sense, it is not possible or useful to make a conclusive judgment about whether or not industry concerns about quality of VET in Schools are substantiated.

The strong growth in VET in Schools programs and high-level of support for its outcomes establishes a platform for the program's ongoing development. We have identified a range of strategies that will assist in addressing specific issues and areas where improvements are required in terms of compliance with current policies, implementation guidelines and the requirements of Training Packages. The areas where improvements are required do represent risks and should be considered by the NTQC Risk Management Committee, noting that they may equally apply to other RTOs.

We do not believe that a regulatory compliance approach is in itself sufficient; a greater risk exists in the differing expectations about the purposes and outcomes from the current suite of programs. Rather, we believe that the value of the programs will be undermined and their potential benefit not fully realised unless there is a clearer agreement about the primary purpose of VET in Schools. That is, does VET in Schools have as its main purpose to prepare and assess students for specific jobs and tasks in the workforce? Or, does the program exist to assist in the general preparation of young people to enter the workforce by enabling the acquisition of general employability skills and broad industry and occupational skills, or is it a combination of both? The potential exists to fulfil both purposes. However, the implementation of such arrangements would necessitate explicit clarification of expected outcomes, approaches to assessment and the means by which students may move from one component to the other.

We found that most stakeholders support the second and broader set of purposes and outcomes but that the current range of programs is designed more for younger and older VET students who are able to access work based training pathways. This creates tension between those responsible for the development of the current VET programs and those responsible for their delivery to school students, particularly

when those programs are embedded in broader secondary curricula and where assessment is for purposes other than just the certification of competence.

Our suggestions for a way forward, acknowledging that there are currently successful industry specific programs based on Training Packages, are based on two areas of common ground between all stakeholders:

• supplementing the current range of Training Package qualifications with additional, broadly based qualifications which are designed more for young people to enter the workforce than for those already in the workforce or in work based training pathways, such as apprenticeships and traineeships; and

• developing this new suite of qualifications on a cooperative and iterative basis between those responsible for competency standards development and education authorities and schools based on learning pathways and delivery models that suit the needs of different industry sectors.

Changes to regulatory frameworks, policies and guidelines may be required to accommodate these new areas of provision. For example, adjustments to the AQF descriptors may be required and the changes flowing from the review of Training Package guidelines will need to be accommodated. Furthermore, an ongoing program of quality improvement, including greater pre- and in-service training for schoolteachers in the development of delivery and assessment of VET programs and opportunities for industry placement, will be required.

If current trends continue, over a quarter of a million school students will be involved in VET in Schools programs within a few years. We have a collective responsibility to ensure that those young people are involved in programs with agreed purposes and valued outcomes. The suggestions outlined in this report provide a platform for that responsibility to be fully realised.