Submission no: 34 Received: 25 March 2003

# Submission to the Senate Employment, Workplace Relations and Education References Committee Inquiry into Current and Future Skill Needs

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Thank you for the opportunity to make a submission to the Senate Inquiry into Current and Future Skill Needs. I wish to address the following three issues:

- the extent to which the ANTA mandated training packages are an effective tool for developing skills. This will be the major focus of my submission;
- the impact of the division of post-compulsory education and training into sectors and the resulting fragmentation of provision and lack of coherence in approaches to preparing graduates to work in particular occupations; and,
- the level of openness and willingness to consider divergent views within the VET sector.

## **Training packages**

The Australian National Training Authority seeks to build skills in Australia through training packages. Qualifications are designed for specific occupations which are competency-based, modular and comprise industry derived competency standards incorporated into 'training packages'. All publicly funded course delivery in the VET system in Australia *must* be based on training packages where they exist, and industry endorsed standards where they do not. Training packages have three endorsed components: the industry endorsed competency standards; the qualifications that can be awarded within the package; and the assessment guidelines. Assessment must be *directly* against the competencies in the training package, and must take place at work or in a simulated work environment.

Training packages usually also contain training package support materials, which are not endorsed, and their use is not compulsory. Support materials include learning strategies, assessment support materials and professional development materials (ANTA, 1999). Training package materials that meet required criteria may be quality endorsed by ANTA, and labelled as such. There is *no* accredited curriculum, or indeed nothing that is readily recognisable as curriculum contained in national training packages. Nevertheless these are the specification of what must be taught and assessed by the training provider.

The arguments for training packages are that they:

- comprise competencies specified by industry as necessary to undertake particular occupations, with the result that industry gets the skills it needs;
- result in nationally portable, consistent, recognised qualifications;

- facilitate recognition of prior learning and credit transfer, ensuring students do not have to repeat learning they have already undertaken;
- allow great scope and flexibility for developing 'inputs' (curriculum) that meets the needs of both students and specific employers. It is also argued that this allows providers to develop, customise and implement courses very quickly, provided they comply with the training package requirements;
- promote flexible learning and on-the-job learning;
- facilitate the development of nationally consistent, verifiable quality systems;
- force providers to become responsive to industry needs, and avoid the problem of 'capture' by teachers (the producers of education) who are putatively more interested in serving their own interests rather than those of industry (Marginson, 1997).

However, on the one hand, I would argue that these benefits are not uniquely intrinsic to training packages, and on the other, that they will not be able to deliver these benefits (Wheelahan and Carter, 2001). There are many problems with training packages, and they can be grouped into two broad categories: the first concerns the *model* of qualifications and provision they represent; and, the second concerns problems with *operationalising* them. These overlap.

## Training for a specific occupation

The first proposition, that training is for a specific occupation which involves learning specific job-related competencies, is too limiting. While almost all those undertaking study qualifications are studying for vocational reasons (including in higher education), this doesn't mean that studying must be *limited* to what happens in a particular occupation. There are two problems with this: first it does not acknowledge the broader role VET must play (as does higher education) in helping students to acquire the skills they need to participate in society and in their communities as active citizens. All education and training in Australia must serve both purposes.

It conflates all VET students into one category, without understanding the diversity of students and their diverse aspirations and goals. It is important to differentiate between mature aged students and younger students, and also between those seeking an entry level qualification and those who are seeking to upgrade their qualification in their current profession or occupation. For example in 2001, young people aged under 25 comprised almost 40% of all VET students, but accounted for almost 55% of all hours of training undertaken (NCVER, 2001). While young students are a minority, they are an important minority and account for a majority of student load, and in absolute numbers vastly exceed the number of young people in higher education: 691,700 young people aged under 25 studied in VET in 2001, compared to 422,573 in higher education (in 2000) (DETYA, 2001: Table 44). Even were just occupationally-specific training appropriate for adults already in the workforce seeking to upgrade their qualifications, it is not appropriate for young students and neither is it appropriate for students seeking to enter a (new) vocation, whether they are young or old.

Training packages are based on a fiction. They have been designed for, and *assume* workplace delivery, when in fact most training occurs within an institutional framework. Most VET students are *not* apprentices or trainees; approximately 19% of all VET enrolments were apprentices or trainees in 2001 (derived from comparing information from

NCVER, 2002a; NCVER, 2002b)<sup>1</sup>. The Australian Bureau of Statistics reports that of those studying from certificate 1 to advanced diploma level, 70% reported that the main method of delivery was classroom instruction, lectures, seminars, workshops or conferences. Moreover, only 17% of those studying at diploma or advanced diploma level reported that they received financial support from their employer, as did only 14% of those studying at certificate 1 or 2 level. A higher but still modest 37% of students studying at certificate 3 or 4 level said they received financial support from their employer, reflecting the higher number of apprentices and trainees among these qualification levels (ABS, 2002: derived from Table 18). This is not the picture one would expect if most training were conducted on the job, and supported by employers. Many training packages at certificate 4 level and above also incorporate competencies related to supervisory skills, which are inappropriate for students seeking entry level qualifications, particularly young students.

## Conflating needs of students with needs of employers

Training packages conflate individuals' vocational aspirations with industry needs. ANTA, as part of the consultative process leading up to the next VET strategic plan, issued a *discussion starter*, which poses as unproblematic the relationship between what individuals want and what industry needs, and implies that one can be deduced from the other. However, while industry needs and individual needs and aspirations are interdependent, they are not the same, and one cannot be reduced to the other.

The *discussion starter* (ANTA 2003: 6) says "Because vocational education and training is primarily about ensuring employability and employment security for individuals, industry leadership is critical." It is hard to argue with this statement: the problem is with the emphasis. Industry leadership is important, but so to is leadership from other stakeholders if VET is to play a broad role in supporting communities and individuals. A distinction needs to be drawn between industry *led* and industry *driven*.

The interests of employers and students are not identical. While employer organisations talk about the broad attributes employees need, most employers' investment in training is, as the *discussion starter* states, 'just for my business' and 'just what it needs now'. This is different to broad capacities and skills, and particularly lifelong learning skills. Evidence suggests that while the percentage participating in training in the work force may have risen slightly, that the *intensity* of training has declined, with fewer hours of training per employee. The percentage of employers who expend less than 2.5% of their payroll has grown from 51% in 1991 to 61% in 2001, with the number of employers spending more than 5% of their payroll on training declining by 50% over the same period (Spierings, 2002).

ANTA's (2003) discussion starter cites research on labour market trends which show increasing casualisation, labour hire, and part-time work, coupled the prospect that individuals will be increasingly responsible for investing in and developing their own portfolio of skills. Some employers (particularly large employers) may be prepared to invest in the learning required to develop broad skills and attributes, but it is more likely that workers will be expected to have these already, and to perhaps acquire task specific skills on the job. Moreover, many occupations are (as the discussion paper notes) low skill and while

<sup>&</sup>lt;sup>1</sup> Not all training on the job is undertaken by trainees or apprentices. Other students may well train on the job, particularly training conducted by enterprise providers, but most training towards accredited qualifications is not on the job.

people need to be trained for these occupations, they need a broader education than suggested by the work requirements of the occupation.

There is no problem with industry defining what it needs for particular occupations. The problem arises when learning is *limited* to this, and this is precisely what training packages do. VET's responsibility is not just to train students for a job, but also for a career, or a vocation to use an old-fashioned term. This requires skills of self-evaluation, critical reflection, career planning and determining strategies to achieve personal goals and aspirations. These are attributes of a self-managing individual, not a job. Study skills and research skills (appropriately contextualised) may not be intrinsic to being a waiter, but they are to managing one's own learning in how to be a waiter and in occupations thereafter.

## Lifelong learning

The current approach of training for a specific occupation based on industry specified competencies does not sit well within a lifelong learning framework. In a paper for the OECD which considers the role of qualifications frameworks in promoting lifelong learning Young (2001) suggests that "...new kinds of learning may need to be encouraged that cannot easily be predicted in advance and may not be readily assessable for qualifications."

Young (2001: 9) asks if the focus on criterion-based outcomes in qualifications (as in our model of competency-based training) narrows the kind of learning needed for people to become lifelong learners, and to become the kind of workers needed in a rapidly changing society:

...it may ... also be useful to explore evidence of the extent to which an over-emphasis on qualifications (and in particular, the tendency for this to lead to a greater emphasis on the assessment of outcomes) can unintentionally inhibit the on-going learning that is not geared to testing or assessment. If people are to become lifelong learners it is the learning that is not immediately tested or linked to qualifications that needs to be encouraged.

Young (2001: 9-10) argues that the focus on specific outcomes assumes that "the outcomes of learning are already known..." However, the pace and "unpredictability of technological development and the emergence of new markets" means that the outcomes cannot always be defined in such a way as to lend themselves to detailed, precise, and prescriptive statements. Further, that:

It may be that the balance between control and risk will need to shift, with less emphasis on assessing pre-defined outcomes and more on enabling learners to explore new possibilities that cannot be predefined. In other words, supporting learning may not be equated with a greater emphasis on qualifications, unless qualifications are themselves defined in new ways with less emphasis on prior specification of outcomes and more on learning processes and the judgements of different stakeholders. (Young, 2001: 10)

### This is because:

...the skills for jobs are changing faster than ever [and] qualifications need to provide broad evidence of capabilities and potential; evidence that someone is able to demonstrate specific skills or knowledge will remain important but is likely, on its own, to be less and less 'vocationally' relevant. (Young, 2001: 10)

Rather than a focus on specified skill outcomes (as with training packages) which are inevitably based in current or past practice, more emphasis needs to be placed on process oriented outcomes, in particular learning to learn skills, and the skills needed to be a self-managing individual. This has two implications: first, it means that outcomes in a qualification should not be limited to the skills needed to perform a particular job. Second, it suggests that a new balance between campus-based and on-the-job learning needs to be found, with both sites included and no one site privileged over the other.

This requires a new model of provision, and it appears the states are prepared to bypass ANTA to achieve it. The Victorian State Government has signalled its intention to broaden the range and type of courses it delivers and funds in VET, which includes, but is not limited to, training packages. The government argues that current qualifications "are not well matched to the skill needs of emerging occupations...It appears that there are requirements for a mixture of vocational, academic and generic skills not usually available through current qualifications" (Kosky, 2002: 9 - 10). Guy Healy, writing in the March 18 *Campus Review* said that "Queensland VET has flagged the development of a new set of qualifications that straddle universities and vocational education and that are aimed at countering the state's unmet and helping to realise its Smart State goals."

Separating assessment from processes of learning

Training packages separate outcomes (and assessment to measure outcomes) from processes of learning. ANTA insists that training packages are not curriculum and should not be used as curriculum. Rather, they are the outcomes required, which, the theory goes, leaves providers free to develop whatever "inputs" are necessary to achieve those outcomes. The ANTA CEO Moira Scollay (2000) argued in an article in *Campus Review* that training packages are:

*not*... a package of prescriptive curriculum which can disempower professional teachers and limit the application of their pedagogical skills and knowledge.

ANTA insists that training packages allow for holistic and integrated assessment of performance, and that this is what gives teachers great scope.

In its Training Package Development Handbook (Competency Standards), ANTA (2001: 3) explains that:

A competency comprises the specification of knowledge and skill and the application of that knowledge and skill to the standard of performance required in the workplace.

It is the smallest unit which is assessed and nationally recognised. ANTA (2001: 11) explains that "A unit refers to a competency which, when applied in a work situation, can logically stand alone." Each unit of competency has *elements of competency*. Elements of competency are:

...the basic building blocks of the unit and continue the description of the key purpose of the unit itself. They describe, in outcome terms, functions that a person who works in a particular area of work is able to perform. Elements must describe actions or outcomes which are demonstrable and assessable. (ANTA, 2001: 16)

In addition to units of competency, which are broken down into elements of competency, we also have performance criteria:

Performance criteria are evaluative statements which specify what is to be assessed and the required level of performance. It is here that the activities, skills, knowledge and understanding which provide the evidence of competent performance are specified. (ANTA, 19)

To complete the picture, each competency has:

- a range statement (a statement that contextualises the competency); and,
- an *evidence guide* (which guides "assessment of the unit of competency in the workplace and/or training program" and "which relates directly to the performance criteria and range of variables" ANTA, 2001: 25).

Teachers *must* teach to each of these components. These are the *outcomes* against which they must assess students. Moreover, ANTA specifies the approach to be taken to including knowledge in competencies. After explaining that "underpinning knowledge will often need to be assessed in order to ensure that the person understands the 'why' as well as the 'how'", ANTA (2001: 7) explains that:

Standards should not include entirely knowledge based units, elements or performance criteria unless a clear and assessable workplace outcome is described.

Knowledge and understanding:

- should be placed in context
- should only be included if it refers to knowledge actually applied at work [my emphasis. It is hard to see how this lends itself to developing learning to learn skills.]
- could be referred to in the performance criteria and the range statement, and specified in the evidence guide

For the purposes of this submission I considered the Certificate 4 in Retail Management. Each qualification specifies which competencies are included. I examined the 6 compulsory competencies, and chose 6 competencies that were related and were permitted in the rules. The Certificate 4 in Retail Management has:

- 12 competencies (6 core and 6 elective);<sup>2</sup>
- 62 elements of competency;
- 315 performance criteria statements; and,
- range statements and evidence guides.

Providers and teachers are *audited* against meeting these requirements. There are two inescapable conclusions from this: first, it demonstrates the extent to which training packages contain competencies that are atomistic and consequently lend themselves to 'tick and flick' approaches; and second, training packages have been designed to make them 'teacher-proof'.

<sup>&</sup>lt;sup>2</sup> This is based on the 6 core competencies, and the 6 elective competencies I selected. Had I selected an alternative set of electives, the number of elements of competency and performance criteria statements may be slightly different.

## Problems with implementing training packages

There are many problems with implementing training packages, which reinforce the tendencies already present to a 'check list' approach to teaching and learning. These can be divided into three areas:

- the consequences of the 'growth through efficiencies' policy of the federal government;
- the way in which provision is funded in many states; and,
- the way in which reporting outcomes occurs.

The 'growth through efficiencies' policy at the federal level, and state government attempts to create 'meaner and leaner' TAFE institutes has led to declining resources. Harris (2002: 37) explains that teachers perceive "a shift in emphasis from processes of learning to an increased emphasis on assessment" and that they are little more than ciphers for industry wishes. Efforts to holistically teach and assess are confounded by problems of increasing casualisation of teacher and declining resources for the sector:

...in a context where resources are scarce and outcomes paramount, teachers are often faced with ethical dilemmas as they wrestle with decisions that require them to juxtapose issues such as ensuring a sufficient base of underpinning knowledge or breadth of experience against efficiency considerations.

In theory it is possible to aggregate and disaggregate competencies and elements of competency in a holistic way. Indeed ANTA encourages this. However, the reality is that most funding arrangements and student management information systems *force* teachers to use the competencies as 'inputs', that is as curriculum.

Even though training packages are meant to be an outcomes based model of provision, funding is still based on inputs. In many states, VET providers are funded on the basis of student contact hours tied to individual competencies, not to whole courses or qualifications. Providers are required to ensure that hours allocated to each competency are indeed expended on that competency, and not on another. They are audited on this basis, and they must *report* on the basis of competencies.

Student administration are required first to support the institution's legislative obligations in reporting and auditing. This means enrolling students in competencies and not in modules or subjects. It is bureaucratically simpler to just treat training packages as if they are curriculum.

The result? Students are mostly enrolled in competencies that are taught sequentially and separately. Assessments are often matched to each competency, and not holistically as hoped. Competencies are unrelated and disaggregated. This is not the coherent, learner-centred approach that we were promised.

RMIT tried to solve two problems in its new student information system. The first problem they tried to resolve was to have a student information system able to accommodate the reporting requirements of two sectors (TAFE and higher education) to two different levels of government. The second problem they tried to solve was to develop a system that provided teachers with freedom to develop learning programs unconstrained by having to use the

competencies as curriculum. It cost millions and it didn't work. As far as I know, both problems remain unresolved.

I have worked with many TAFE teachers over the last few years, and now teach VET practitioners (mainly TAFE teachers). The impression I get is that teachers find they must use competencies as curriculum, and develop 'check list' type approaches, to ensure they 'cover' all the performance criteria. They feel deskilled as teachers, and feel students are being sold short.

# Impact of the sectoral divide

The sectoral divide in Australia results in fragmentation of provision and lack of coherence in approaches to preparing graduates to work in particular occupations. Institutions in both sectors have attempted to resolve these problems through:

- institution to institution (or intra-institution) articulation and credit transfer arrangements;
- arrangements to facilitate student progression from one sector to another in dualsector universities; and,
- the creation of 'co-locations' which involve a higher education, TAFE and often a school campus. This is emerging as an important model in regional Australia.

Training packages present a problem for cross-sectoral collaboration (Carnegie, 2000; Wheelahan and Carter, 2001). As higher education courses are based on a curriculum model, this poses significant problems in determining the extent to which articulating students share the same knowledge base. As an example, I remember one academic angrily thrusting an academic transcript of a TAFE student at me, demanding that I explain "what does this mean!" It was hard not to sympathise with his plight. The transcript was pages and pages of competencies the student had achieved which had no obvious academic coherence or even content. He said that he was recommending that articulation arrangements be revised so that articulation for TAFE students be for completed diplomas only, and not for partly completed qualifications or lower level qualifications as was the case previously. Moreover, credit would not automatically be extended to all articulating students. The inevitable result is that credit transfer arrangements are often negotiated individually at the course, department and institution levels, rather than systemic credit transfer arrangements at a state or federal level.

Perceptions with the problems with training packages, particularly at the diploma/advanced diploma level, have led to calls for the creation of a new associate degree. This has been characterised by sectoral brawling (for example, the differing positions of the AVCC, ANTA, and TAFE Directors Australia) as to whether an associate degree should be a higher education only qualification, or a VET qualification. My view is that the problem is not diplomas or advanced diplomas *per se*, but the training packages upon which they are based. I don't think we need a whole new qualification – we need to fix the ones we have. Unless and until this is addressed, many students will be required to undertake narrow skills focussed qualifications that don't necessarily give them the skills they need for work, let alone the knowledge and skills they need to be active citizens and lifelong learners.

Dual-sector universities and co-located institutions face further obstacles. Each sector answers to different levels of government. They are governed by different funding, reporting and accountability guidelines, and different industrial awards and unions cover teachers in

each sector. All of this presents expensive and time-consuming obstacles to both dual-sector and co-located institutions. The dead weight of administrative requirements is an almost irresistible counterforce to policy that seeks to deepen and extend collaboration. Industrial issues are often masked as disputes over philosophy, teaching style and standards, but upon closer examination are just as often about preserving jobs and status in each sector.

The more important distinguishing features of the sectors are the accreditation frameworks and curriculum models in each. Both are locked into rigid frameworks that limit the nature of courses that can be developed, and hence the capacity of courses to meet student needs. Under-graduate provision in higher education is focussed on the three year degree. Students who do not complete the three years do not receive certification. TAFE is locked into training packages that are tied to industry derived competencies and specific occupations. TAFE's capacity to offer broad-based education is focussed at lower levels of provision and is generally under-funded and under-valued.

A nationally coherent policy framework that supported lifelong learning and the development of skills would promote and facilitate:

- embedding VET qualifications in degrees. This would allow students undertaking degrees to acquire early certification, which they could use to obtain work while studying;
- nested awards, particularly for para-professionals to professionals. For example, why
  isn't all first year nursing teaching conducted in TAFE? This would enable students to
  be credentialed and obtain work as enrolled nurses while they continue studying
  towards their nursing degree. Such an outcome would deepen learning and improve
  professional competence;
- arrangements which certify learning for degree students who do not complete their degrees, but who have still undertaken significant learning and skills development. This would help to accommodate the appalling attrition rates in higher education (more than this is needed, for example, attention to the nature of programs offered in, and the quality of teaching, in HE). However, a major obstacle arises for VET, and this is that because HE students have not been directly assessed against competencies in training packages, there is no proof they are competent, regardless of the grade they may have received.

The development of a nationally coherent framework for lifelong learning requires the capacity to consider issues independently of the interests of the sectors. The demise of the National Board of Employment, Education and Training (NBEET) means that no such bodies exist. The problem is that in Australia there is *no* scope for developing policy frameworks independently of the interests of the sectors. The division in DEST between higher education and VET means that bifurcated policy advice continues to be offered to government, and this sustains the self-interested agendas of the sectors. A central body advising government about *tertiary* education in Australia would perhaps offer a range of suggestions concerning skill formation that we are not able to currently consider.

The OECD (1998: 10) explains the challenges confronting governments are not simply to do with:

....co-ordination across sectors, institutions and programmes and greater recognition of the value of different forms of learning, but unified and coherent policies which treat the first years of tertiary education as one element in a much longer cycle, stretching back to schooling and forward to advanced study and continuing education over the life cycle. As yet, policy development has not proceeded as far as it needs to in these directions.

#### **VET** culture

The final issue I wish to consider is the level of openness and willingness to consider divergent views within the VET sector. I make these comments as an ex-TAFE teacher, as one who now teaches TAFE teachers, as a cross-sectoral staff developer and policy officer, but most of all, as a cross-sectoral researcher, and public commentator on VET and cross-sectoral matters. This has brought me into contact with many people in all sectors over the years. It is hard to point to direct evidence in the literature (although there is some), because the sort of problem I am discussing is exactly the sort of thing that cannot be written. I regard myself as a critical friend of the sector, and make these comments in the spirit of constructive criticism so that VET can fulfil its potential to enrich the lives of Australians.

Frank and fearless critique has been in short supply in the sector, and this seriously weakens our capacity to question existing practices, and develop new ones. This has improved in recent years, with more public debate about ANTA strategy and training packages occurring in the media, in journals and at conferences. It must be noted however, that many of these public critics (including me) are not employed by the sector, and so are not as constrained as we may otherwise be. The ANTA (2003) *discussion starter* and the process of consultation they have implemented to contribute to the new national VET strategy hopefully signals a new openness and inclusiveness that has hitherto been lacking.

Problems with VET culture arise from two factors that are so inter-related it is difficult to distinguish the effect of each:

- the pervasive view rooted in the reforms of the late 1980s, that TAFE teachers and institutions had 'captured' the sector (the 'problem' of 'producer capture'), that they had a monopoly which must be broken, were not responsive to industry and industry needs, and that attention must be focussed on the 'demand-side' of the market (Marginson, 1997; Goozee, 2001); and,
- the way in which ANTA confuses its role as a statutory government authority with that of a peak body.

Both arose from the desire to make VET industry driven. ANTA was established explicitly as an industry board that excluded educators. However, as a consequence of sustained pressure, ANTA relatively recently established an Enterprise and Provider Working Group, the chair of which is now an ex-officio member of the ANTA board. The overall effect was that criticisms which questioned the industry preponderance and focus were not even able to get on the radar. Not only that, those who were critical from within the sector were regarded in some way as 'disloyal' to the sector.

This culture encompassed institutions. In an effort to make TAFE lean and mean, TAFE teachers who argued against the new direction were seen as insufficiently entrepreneurial, as not having 'what it takes' in the new reality. TAFE now had to be run as a business, and operate along business lines, we were told. You can't criticise your own business to outsiders. It is bad for business. Promotions were open to those prepared to go out and drum up business, who understood the 'new reality'.

Teacher resistance to changes was interpreted as a desire to cling to previous (and by definition wrong) practices, or that they didn't have the necessary skill to implement the changes, or that they didn't *understand* the nature of the change and the benefits it would bring and that this could be 'fixed' through staff development. It was never conceded that teachers may have had a point worth making.

This was a campaign for hearts and minds, one in which ANTA took the lead. The following quote from the ANTA CEO Moira Scollay (2000) shows her attempt to position ANTA as leader of revolutionary change, which by its very nature will challenge adherents to the old orthodoxy, but which nonetheless tries to make a bridge to this group by emphasising continuity with the past, particularly in teaching:

A revolutionary tide has swept through Australia's vocational education and training system over the past decade, bringing with it new and better ways of linking the world of work and the world of learning.

Like many a strong tide, it has challenged some footings. However, the long-standing, quality foundations hold firm. The art and science of teaching remains a key foundation.

If you are not for us you are against us. This is not due to the staff of ANTA, but is characteristic of a culture within which ANTA operates. In this context it has been difficult for critical friends within the sector to speak out. There are many teachers, senior VET staff, and VET researchers (including those from universities) who will not publicly criticise ANTA or ANTA's framework, although they will speak off the record. I know this anecdotally from my own experience, research, networks and from conferences and seminars.

Much VET research is of the kind that seeks to determine how to implement policy more effectively, which is reasonable. But, we also need research which *questions* policy, and asks, is there a better way? However, because ANTA is ultimately the source of almost all research funding in VET, it is very difficult to find funds to undertake groundbreaking research. An example of groundbreaking research is that which was funded by the Board of Vocational Education and Training in NSW in 2001, which funded two key research centres to look into the future of work, and the implication this has for skill formation. In all fairness, it must be stated that the current VET research priorities are the most open and inclusive that they have been, and this together with the openness of ANTA's *discussion starter* may result in new sorts of conversations in the sector.

The problem stems in part from ANTA's self-designated role as a peak body even though it is a government instrumentality. It is hard to find another government instrumentality that weighs into the debate with the same level of rhetoric, taking swipes at those it considers has different positions (consider, for example, ANTA's submission to the *Crossroads* Inquiry, where it says of the AVCC: "the AVCC is currently opposed to sharing the qualification titles between the sectors no matter how compelling the case") (ANTA, 2002). They may be right, but is it appropriate for a government instrumentality to be making these statements (and many others)? It *is* appropriate for TAFE Directors Australia to make such comments, because they *are* a peak body.

Indeed, the establishment of TAFE Directors Australia in 1998 helped to break down the perceptions of a monolithic culture which brooked little dissent, by creating another voice. The states have contributed to openness and debate, in the way they have considered the role and purpose of VET qualifications in their states. In all fairness, ANTA has contributed to creating greater openness most recently, through the processes it has put in place for the development of its strategic plan. While there have been critics of ANTA's approach and questioning of the extent to which it will be able to elicit the range of perspectives and views needed to reposition VET (see Simon, 2003; Forward, 2003; Mitchell, 2003), the consultative process represents a new and welcome way of doing business, as does the tone and range of issues raised by ANTA's (2003) discussion starter.

However, it appears this openness may not extend to a reconsideration of the role of training packages, which is a pity, because these are the basis of provision throughout the VET sector. In its *discussion starter* ANTA (2003: 10) signals that no matter what, it will persist with the training package model:

Training packages comprise an enormous investment by industry and governments. The system's reputation relies on the results of this investment.

ANTA's (2003) *discussion starter* also exhibits the same sort of evangelising language that makes it difficult to raise criticisms:

Training Packages are revolutionary because they allow teachers and assessors to meet all these demands – and more – for flexibility, innovation and customisation, however their full potential is yet to be unlocked.

The problem is not training packages, we just aren't doing it right, yet (haven't we had long enough?). This resonates with the experience in the UK. Alison Wolf (Wolf, 2002: 76 - 77), outlines a similar scenario in relation to National Vocational Qualifications, the equivalent of training packages:

...it became an article of faith that awarding enough NVQs could and would somehow transform the nature of the UK economy, bringing productivity in their wake. If this was not happening, it was because of temporary difficulties in making assessment available, or because the 'awarding bodies' who actually assessed and awarded qualifications were dragging their feet, or simply because not enough had been done to publicize NVQs.

The few sceptics inside government who attempted to force any rethink of the policy got nowhere. They faced a solid phalanx made up of true believers plus senior officials who had told too many people for too long that everything was working to start admitting the opposite now....

It is hard to know how much and for how long civil servants and ministers were victims of their own spin....

But did the enthusiasts really believe their own full-page advertisements in the national press?...

We need to do better than this in Australia

Thank you again, for the opportunity to make this submission.

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