Chapter 9

Accredited and articulated training

9.1 Accredited training provides assessed, recognised and portable skills. Articulated training comprises sequential or tiered programs resulting in qualifications ranging from diplomas to certificates, graduate and post-graduate qualifications. Accredited training is the basis for articulation into further training and education, both within the vocational education and training (VET) sector and into the higher education sector. Articulation ensures efficient pathways through the formal education system and, amongst other benefits, encourages individual lifelong learning and supports sound success planning and career development.¹

9.2 The benefits of structured training have been recognised for some time. The Joint APS Council's 1992 report, *Off to a Good Start*, stated that structured training was 'not just the integration of off-the-job and on-the-job training'. Rather it was characterised by:

- a curriculum setting out agreed learning outcomes and objectives;
- systematic management of the learning (for example, through a coordinator, supervisor, management committee, group scheme, or a combination of these);
- monitoring and quality control (to provide feedback on progress); and
- assessment and certification.²

9.3 Scope for training to be credited towards a formal qualification encourages employees to commit to undertaking professional development. This is important since responsibility for ongoing professional development is in the interests of both individuals and their employers and, it can be argued, in a devolved environment is their joint responsibility.

9.4 Increases in staff productivity have been linked to the receipt of accredited awards and the subsequent improvement in employees' self-esteem and confidence combined with wider recognition of achievements.³

9.5 The development of opportunities for accredited and articulated training in the APS, then, promotes a focus on the attainment of skills and knowledge appropriate to APS employees' present and future work, encourages ongoing professional development and furthers a culture of lifelong learning amongst APS staff.

3 ATO, Submission no. 22, p.7

¹ APSC, Submission no. 15, p.38

² *Off to a Good Start: Towards New Training Structures for Young People and New Entrants to the Australian Public Service*, Joint APS Training Council, 1992, p.87

9.6 In this context, this chapter discusses a range of structured training programs available in the APS, namely:

- the Public Services Training Package (PSTP) framework (that is, accredited training and skill recognition based on nationally agreed and stated public sector skills linked to the National Training Framework (NTF));
- graduate level programs being developed for APS employees including the Public Sector Management (PSM) course; and
- examples of accredited and articulated training in APS agencies.

Accredited and articulated training in the APS

9.7 The NTF is the result of reforms resulting in a more integrated VET and higher education system. It provides the foundation for accredited and articulated training in Australia. The APS' link to the NTF is the Public Services Training Package (PSTP), which the APS Commission stated it helped to develop, promote and support. It considers that formal recognition through the NTF gives agencies and individuals the opportunity to build capability 'in a logical and targeted manner'.⁴ As at May 2002, agencies committed to accredited learning included Defence, Centrelink, the Australian Taxation Office (the ATO), Australian Customs Service (ACS) and a number of smaller agencies. This meant that over 60 per cent of the APS could access accredited training in the workplace, along with nationally recognised qualifications and articulation to higher education.⁵

The Public Services Training Package (PSTP) framework

9.8 The PSTP is the APS' key link with the NTF, consisting of a national training package describing the basic skills required for effective public servants. The PSTP framework consists of a flexible qualifications electives structure with links to endorsed training packages and competency standards. The aim was to provide qualification outcomes in as many public sector jobs as possible for APS employees across all Commonwealth and State government agencies. The PSTP was launched in October 2000 and is presently under review with re-endorsement expected by November 2003.⁶

9.9 The PSTP meets Australian Quality Training Framework (AQTF) standards. Courseware was developed by Public Service Education and Training Australia (PSETA) under APS Commission leadership with the support of the Department of Defence as the primary contracting agency.

9.10 The APS Commission told the Committee of its ongoing role regarding the PSTP, including the following:

6 ibid, pp.35-36

⁴ APSC, Submission no. 15, p.35

⁵ ibid, p.36

- advising PSETA on areas not yet covered by the PSTP for inclusion in the framework;⁷
- promoting the PSTP through maintenance of a network of VET contacts in agencies, holding regular VET network meetings where agencies can present information on their use of accredited learning, and providing information on the package and its use in different agencies;
- identifying links between APS Commission programs and skills described in the PSTP;
- encouraging training providers to link learning outcomes to accredited training;
- providing advice to agencies regarding mapping and possible upgrading of existing training to meet nationally recognised qualifications; and
- providing advice to accreditation and registration bodies on courses proposed for the public sector to ensure they meet PSTP skill levels and standards.

9.11 The APS Commission claimed that creation of the PSTP has encouraged private providers to develop learning resources based on the PSTP skill outcomes. It stated:

The Commission informs APS departments and agencies of services available from commercial providers of accredited training, especially that linked to the Public Services Training Package.

The Commission has encouraged training provision by alerting providers to opportunities, by providing information on training and education trends, by liaising between individual departments or agencies and potential providers and by circulating information on available accredited training provision.⁸

9.12 Open Learning Australia (OLA) was contracted to develop training materials for the PSTP. A consortium of agencies (ATO, Centrelink, Comcare, ACS, AFP, ATSIC) agreed to share the costs of developing the common set of print learning materials. OLA advised that, in the process of developing the materials, agencies not only worked together to build an industry approach to their education and training needs, but also engaged effectively with the education sector, allowing it to remain abreast of industry needs.⁹ As it has done for the PSM course (discussed below), OLA is investigating an interactive online format for the PSTP course.¹⁰ It is also contracted to provide PSTP face-to-face and distance learning programs nationally for Defence.

9.13 The APS Commission said that it had provided support not only for development of the training materials for the PSTP but also for their national delivery

10 ibid

⁷ ibid

⁸ ibid, p.37

⁹ OLA, Submission no. 7, p.4

to ensure that all APS agencies could access both the materials and their delivery without conducting a full tender process.¹¹

Articulation of the PSTP to other qualifications

9.14 The PSTP 'allows recognition of existing skill and articulation of that recognition into further qualifications'. The APS Commission stated that it has encouraged articulation from the PSTP into the VET and higher education sectors. It cited a range of opportunities for articulation from the upper levels of the PSTP (diploma and advanced diploma) into other programs, including:

- into existing courses at the universities making up the consortium of seven universities that developed training materials for Commonwealth agencies;
- as credit or advanced standing for a range of existing Masters programs;
- into the PSM course, as part of a suite of courses leading to university qualifications in public sector management;
- into the graduate program in public administration and policy (leading to graduate diploma, masters and masters (honours)) being developed by the consortium of seven universities; and
- into OLA's masters program in leadership and public policy, designed to build on learning outcomes from the PSM course.

9.15 The APS Commission claimed that these opportunities provided 'powerful motivation' for individuals and agencies to access PSTP qualifications and the articulation options available to them as a result. It told the Committee:

Training articulated into further education and training promotes seamless transition between skill streams and from VET to higher education. Among other benefits, it encourages individual lifelong learning and supports sound succession planning and career development.¹²

The Public Sector Management program

9.16 The Public Sector Management (PSM) program has been designed as the transition point from qualifications based on competency standards to university qualifications. It has been developed specifically for APS middle managers.¹³

9.17 It is a joint venture partnership between Commonwealth and State and Territory governments. Successful candidates are awarded a Graduate Certificate by

¹¹ ibid

¹² APSC, Submission no. 15, p.37

¹³ APSC, Submission no. 15, p.33

the university sector.¹⁴ The course is managed by a national board comprising representatives of each tier of government. As a national course it has a common curriculum and course materials. However, each jurisdiction has its own approach to course management and delivery, tendering separately for facilitators to deliver the program which has, up until now, been largely through intensive face-to-face workshops of up to 5 days duration.

9.18 The PSM program has recently been redeveloped. OLA was the successful tenderer and the redeveloped course was delivered in December 2002. OLA works with over 20 Australian universities and providers of vocational education to give learners access to a range of off-campus studies that can be credited towards formal qualifications in the fields of arts and humanities, business and commerce and the information technology and biological sciences. Within this framework OLA markets courses, enrols students and collects fees while the academic institutions provide study materials and tuition.¹⁵

9.19 A key feature of the redevelopment was incorporation of the option for flexible online delivery in conjunction with online support. While this requirement has been met and the course is fully available as online courseware, the PSM board has not yet approved implementation of delivery online. Discussions are ongoing in relation to this matter and also in relation to making the PSM course available to candidates outside the PSM program. The Committee understands that there is in principle support for this proposal, provided the integrity of the course is kept intact.¹⁶

9.20 The new course has common themes of accountability, ethics and relationship management and emphasises:

- vision and strategic direction for the public sector;
- an integrated view of business planning and public sector accountability; and
- the ability to demonstrate leadership.¹⁷

9.21 The review and design process was intended to position the PSM course as the management development program of choice for the public sector.¹⁸

9.22 Packages such as the PSTP and PSM courses meet the 'portability requirement' of training by providing essential knowledge and attributes that would be useful in a wide variety of industries. OLA noted that other training frequently

18 ibid

¹⁴ A Tiernan and P Bishop, 'Innovation in Public Sector Education and Training: The New Public Sector Management (PSM) Program', *Institute of Public Administration Australia (IPAA)*, National Conference 2002, Innovation and Impacts Day Presentation – pp.1-2

¹⁵ OLA, Submission no. 7, p.2

¹⁶ Further information provided by Griffith University, 14 March 2003

¹⁷ ibid, p.2

undertaken as part of preparation for work in the public sector, such as in IT, also provides employees with skills that are easily transferable outside the public sector.¹⁹

9.23 The inquiry also heard evidence that agencies have responded to some of the developments in accredited and articulated training described above.

9.24 Learning and development strategies based on identified skills and knowledge requirements to achieve corporate goals and outcomes are included as key elements of most agencies' business planning. Development frameworks based on capability assessments for individual jobs, and structured around accredited programs and articulated training appear to be increasing. Systematic career planning pathways that include formal training arrangements based on articulated and accredited programs are also on the rise.

Leadership training

9.25 In light of the critical importance of good public sector *leadership* already noted in this report, the Committee was concerned that the APS Commission's statements regarding articulation from the PSTP to higher qualifications, particularly those focused on leadership, were not borne out by the evidence.

9.26 While the number of accredited and articulated programs available to APS employees had increased, agencies differed in their arrangements for staff to undertake accredited programs. These ranged from participation in external competency-based programs and training leading to the award of graduate certificates or diplomas with accreditation towards higher degrees, to training developed in-house and tailored to specific skills needs.

9.27 In addition, agencies differed in their use of the PSTP and PSM Courses. For example, *Centrelink* was not a heavy user of the APS Commission leadership and skill programs because of the key role played by Centrelink's Virtual College (CVC) in training and development of its own employees. APS values, code of conduct and leadership framework were, however, emphasised in its 2002–03 learning priorities.²⁰

9.28 The key role of leadership in the public sectors of the future has been recognised internationally. OECD countries have identified the need for more strategically focused leadership development to strengthen the professionalism and leadership in their public sectors.²¹ Griffith University told the Committee that 'several countries have set up systematic strategies for leadership development' and

¹⁹ ibid, p.7

²⁰ Centrelink, Submission no. 26, pp.24, 29

²¹ K Aijala, Public Sector – an employer of choice? Report on the competitive public employer product, OECD, 2001, <u>www.oecd.org/puma</u>, p.16

that 'some have established new institutions to support leadership and professional skills development for public servants'.²²

9.29 The University was, however, critical of the situation in Australia. It claimed that a fragmented and uncoordinated approach to leadership development is a major disadvantage of devolution. While supporting some aspects of the existing Australian system, Griffith University considered that there is scope for more centralised leadership development, suggesting that responsibility for this could lie with the APS Commission 'within a strategic framework as agreed by the MAC'.²³ In the University's view, such an approach should aim to provide APS employees with core skills and a whole-of-government of government perspective.

9.30 The Committee notes the example set by the United Kingdom in establishing the Centre for Management and Policy Studies as a foundation for its reform of the civil service. While serving as a centralised model for professional development, the Centre also provides programs that can be tailored to agency interests and extended to include other participants in the policy process including Ministers, ministerial staff, politicians and others.

9.31 In view of the concerns mentioned above, the Committee sees the recent establishment of the Australia New Zealand School of Government (ANZOG) as timely and highly relevant to the training needs of the APS. ANZSOG is a collaborative initiative of five governments (Commonwealth, New Zealand, Victoria, New South Wales and Queensland) and ten universities and business schools, including Griffith University, the Australian National University and the University of Canberra. It has been developed as a 'national flagship school' to the meet the demand for more than what is offered presently by individual institutions in public sector policy, leadership, financial management, human resources management and research.²⁴

9.32 Like the UK Centre for Management and Policy Studies, ANZSOG aims to address agency needs for courses tailored to specific levels of government, individual agencies and categories of staff. Adopting a similar approach to that of the UK Centre, ANZOG's postgraduate courses in public policy and management have a common core to ensure a strategic approach to professional development across the APS and assist APS staff to obtain core skills and a whole-of-government perspective.²⁵

9.33 The Committee notes that the APS Commissioner sees ANZOG as having the potential to provide APS employees with the skills and knowledge to address some of

²² Griffith University (Brisbane), Submission no. 16, p.2

²³ ibid

²⁴ Professor Allan Fels, AO, *The Australia and New Zealand School of Government*, seminar address, AO, 27 March 2003

²⁵ Griffith University (Brisbane), Submission no. 16, p.2

the main leadership capabilities required in the APS, particularly in relation to improving whole-of-government capabilities.²⁶

9.34 The Committee also believes that ANZOG has the potential to become a key training vehicle for enhancing leadership development. The Committee considers it imperative that APS employees have access to leadership and management training based on a common foundation that imparts key skills and knowledge. It considers that the APS Commission and agencies should lend their support to leadership programs, such as those offered by ANZOG, and promote these to middle and senior level managers.

Recommendation 17

9.35 The Committee recommends that centralised graduate and post-graduate training such as that offered by Australia New Zealand School of Government and other institutions, as well as the new Public Sector Management program, be promoted to employees across the APS.

Training for business purposes

9.36 The inquiry received evidence of accredited training programs tailored to specific business purposes. Many APS agencies are now linking their in-house courses designed to provide qualifications and skills specific to their business needs to accredited programs, competency standards and the NTF with the aim of ensuring quality assurance and continuous improvement.²⁷ Examples of certificate level programs developed for this purpose include the following:

- AQIS employees can complete accredited or partially accredited programs offered by ANTA based on competency standards developed by PSETA. These included:
 - Certificates II and III in Quarantine Inspection the former is mandatory for all new field staff,
 - Certificate IV in Government –conversion of AQIS's existing Certificate IV in quarantine and export inspection to Certificate IV in Government is underway, and
 - Middle Management Development (MMD) based on PSETA competencies, linked to a Diploma in Government qualification but not a nationally accredited program;
- The Australian Maritime Safety Authority (AMSA) offers:

²⁶ APSC, State of the Service Report 2001-2002, p.146

²⁷ DOD, Submission no. 36, p.9

- formal management training tailored to specific business needs (by arrangement with tertiary institutions including University of Adelaide and Australian Maritime College),
- the AMSA Tertiary Training Scheme, a new articulated structured tertiary academic training and development to meet specific business needs that will be compulsory for all marine surveyors and will lead to tiered postgraduate qualifications in maritime policy and administration, and
- structured non-academic training targeted at skills required for specific vocations, for example, specialist aviation and maritime search and rescue training;²⁸
- the Australian Federal Police (AFP) College, an RTO offers Diploma and Certificate IV courses and is in the process of aligning internally accredited programs to the framework through the PSTP package;²⁹
- the Australian Taxation Office (ATO) offers a suite of accredited programs; and
- Defence's Learning Services Network is a registered training organisation (RTO) within the national VET system.
 - Most Defence training is nationally accredited through either higher education or VET awards. Where possible, VET is purchased from contractors in the NTF because it is considered sensible, in light of 'the breadth, depth and complexity of APS jobs in Defence, coupled with location of workforce', to use resources of national systems where these meet its needs.³⁰

9.37 According to PSETA, promotion of accredited and articulated training has been a priority of the national vocational education and training (VET) system and of aware human resource managers in the public sector for some time. It advised that, for many lower level public sector staff, accredited training undertaken through the Public Services Training Package (PSTP) constituted the first formal recognition of skills.³¹

9.38 Nonetheless, PSETA claimed that unaccredited training is still the norm in jurisdictions.³²

- 29 AFP, Submission no. 31, p.7
- 30 DOD, Submission no. 36, p.9
- 31 PSETA, Submission no. 43, p.4
- 32 PSETA, Submission no. 43, p.4

²⁸ AMSA, Submission no. 34, p.3

Centrelink

9.39 Centrelink is one agency which is relatively well advanced in terms of accredited and articulated training, having attained systematic accreditation of its learning and development programs.

9.40 Centrelink's policy is that staff learning is to be 'business and competency based and accredited, supported by learning plans and delivered innovatively'.³³ To this end it uses nationally recognised qualifications for orientating, developing and progressing its large customer service staff.

9.41 It told the Committee that it had become an important APS organisation in the national VET system and that it is now 'adopting a standard accredited induction and training model for all new ongoing recruits'. It considered this enhanced its attraction as an employer and the prospects, particularly in regional areas, for young people.³⁴

9.42 The new competency-based national induction program, presently being finalised, would include e-reference skills and should result in a systemic improvement in staff technical skills.³⁵ Centrelink emphasised that the approach being used both to implement the *Australians Working Together* (AWT) initiative and in the new induction program, balanced training required for new government initiatives and essential ongoing organisational and skill training. It included certificate level training for AWT employees delivered through structured on and off-the-job learning.³⁶

9.43 The CVC is the vehicle through which career pathways and accredited training is provided to Centrelink employees. It is an RTO comprising an in-house team of specialists offering Centrelink employees access to nationally recognised learning and qualifications. It is presently upgrading standards to meet the new ANTA national registration and reporting standards based on the AQTF. This is particularly important for Centrelink to be able to provide more off-the-job training for its employees.

9.44 Centrelink has developed a 'career pathways vision' which, it claims, will position the organisation as an employer of choice, enhancing career equity across regions, and offering new and existing employees learning opportunities for marketable skills and qualifications in the community services, business and IT work streams.³⁷

9.45 In practice, typical career and qualification pathways are plotted within and across the three work streams (customer services, business services and IT) and up

- 34 Centrelink, Submission no. 26, pp.20, 22, 24, 31
- 35 Centrelink, Submission no. 26, pp.5, 32
- 36 Centrelink, Submission no. 26, p.32
- 37 Centrelink, Submission no. 26, p.5

³³ ibid

into managerial and SES positions, with links to certificates and other qualifications. The framework is underpinned by a new 'Learning Management System' (LMS), a single organisation-wide system that will record staff learning and development operations and systematise learning needs analysis. It will provide for mandatory ANTA performance reporting, have stronger links to external training providers and incorporate a broader range of accredited training programs for existing employees.³⁸

9.46 Centrelink offered seven nationally recognised qualifications, including certificates and diplomas. With 3000 enrolments (up from 270 in 2000) it was far in advance of other agencies in terms of its role in the VET system and in national competency-based training systems.³⁹

9.47 Centrelink's processes could have wider application across the APS, both in terms of determining needs and identifying a possible sequence of accredited and articulated programs, as well as the establishment of organisation-wide IT systems to support learning and development programs.

Other agencies

9.48 Other agencies had taken advantage of the PSM and PSTP courses but some had not advanced far in terms of other accredited training. For example, the Department of Environment and Heritage told the Committee that its participation in accredited training had been 'small-scale', with the PSM Course the major activity over the last decade. It had recently become involved in competency training for rangers and trainees.⁴⁰

9.49 Some agencies found that the PSM and PSTP courses did not meet their needs and had developed other comprehensive learning and development strategies. Their objective has been to develop an integrated set of courses tailored to the needs of their employees and delivered in a flexible manner so as to maximise opportunities for staff participation. The Department of Agriculture, Fisheries and Forestry Australia (AFFA) and the ATO are two such examples.

9.50 AFFA is currently developing a training program that will provide opportunities for all staff, from graduates to the senior executive. The intention is for the program to contain elements that would be accredited nationwide and count towards an MBA.⁴¹ AFFA advised that, while it offered all APS Commission training programs, including the PSM course, it wished to provide an alternative program for AFFA employees. In addition to its Graduate Development Program, AFFA had concentrated its efforts (including undertaking needs analysis and examining methods

41 AFFA, Submission no. 19, pp.7, 8

³⁸ Centrelink, Submission no. 26, pp.5, 20, 22, 31

³⁹ ibid, p.20

⁴⁰ DEH, Submission no. 20, p.8

of delivery) on middle management and leadership programs and it expected that a pilot of the leadership program would commence in April 2002.⁴²

9.51 The ATO considered that competency-based approaches are appropriate for generic and clearly identified skill sets, for example, for the purposes of skills portability. However, in its experience, the rate of change in the ATO's work is such that, by the time a training response is developed using competency-based approaches, changes in the work environment have made the competencies redundant, resulting in a negative return on investment.⁴³

9.52 The ATO told the Committee that the need for 'urgent and widespread inductions and skill upgrades to meet business needs' following recent tax reforms, could not be met through the suite of accredited programs that existed at the time. It had therefore 'abandoned any form of the traditional 'shopping list' of available training programs, either from internal or external sources'. Instead, it developed a suite of accredited programs in specific skills areas (including certificates in fraud control investigation, assessment and workplace training and government (for graduate staff), that it now offered 'selectively' to staff.

- These programs (for example, at Certificate IV level in Government) provided staff with a range of career-related development opportunities, including for career needs not required for current positions.
- In addition, the ATO facilitated the requirement for staff to meet professional obligations, for example, to maintain CPA registration.⁴⁴
- It also offered a 'manager development' program to the large number of external managers who joined the ATO as a result of the Tax Reform initiative. The program was for both the purposes of APS induction, as well as to fill skills gaps.⁴⁵

9.53 DoHA also provides opportunities for staff to complete accredited programs internally, while participating in the PSM Course and other external programs. Its internal programs included the Department's Corporate Public Health Postgraduate Programme (CPHPP), conducted in-house by a consortium of universities, as an accredited programme leading to the award of Certificate Graduate Certificate, Postgraduate Diploma or Master of Public Health.

9.54 Externally, DoHA provides opportunities through:

⁴² Further information provided by AFFA, 24 March 2003

⁴³ ATO, Answers to Questions on Notice, Q.21, p.22

⁴⁴ ATO, Submission no. 22, p.9

⁴⁵ ATO, Submission no. 22, pp.7 and 8

- cadetships, including Health Economist cadetships (an accredited post-graduate Diploma in Health Economics) and Indigenous Cadets (NICP candidates sponsored to complete an accredited tertiary course of study);
- the PSM Course, leading to the award of a post-graduate Certificate in Public Sector Management through part-time study; and
- DoHA's Studybank Scheme, providing access to paid leave to undertake parttime study in areas identified as meeting the needs of the Department and/or the APS.⁴⁶

9.55 The Committee considers it significant that AFFA, the ATO and DoHA – some of the larger APS agencies – have decided to develop their own articulated training programs rather than taking advantage of the APS-wide opportunities for articulation being developed with the APS Commission's encouragement. These include the PSM course and the graduate program in public administration and policy noted above. To the extent that agencies are developing their own programs relating to broader skills and knowledge requirements, rather than those needed for specific business outcomes, it could be argued that devolution has gone too far.

9.56 The Committee is particularly concerned at possible dissatisfaction with programs developed with APS Commission encouragement, for example the PSM course. It is concerned that individual agencies have felt the need to develop separate programs to impart skills to their employees that are necessary for all APS employees, for example, on leadership development.

9.57 The Committee returns to these issues in the context of considering the role of the APS Commission in Chapter 11.

9.58 The Committee considers that agencies should promote structured training as part of a broader promotion of their commitment to training and development for their employees. As mentioned in Chapter 7, the Committee believes that training strategies need to be strongly linked to wider corporate and business planning processes. This helps demonstrate to staff the importance and value agencies place on training, as well as adding focus to the role of training in the culture and business activities of agencies.

9.59 It also improves the transparency around training and provides a framework in which progress against training objectives can be evaluated. As with recommendations 11 and 12 in relation to recruitment in Chapter 6, the Committee considers that agencies should report annually to the APS Commission on progress in achieving training objectives, and the APS Commission in turn should report on the progress of each agency as part of the *State of the Service* report.

⁴⁶ DOHA, Submission no. 28, pp.11, 12

Recommendation 18

9.60 The Committee recommends that all APS agencies demonstrate continuing support for employees' training and development aspirations by:

- including a strong commitment to learning and development in corporate plans;
- developing structured training programs and career pathways built on accredited and articulated training where appropriate, publicise these to employees and to potential recruits in agency marketing strategies;
- providing sufficient funds and HR personnel to support integrated training for all employees; and
- reporting annually to the APS Commission on progress in achieving training objectives.

Recommendation 19

9.61 The Committee recommends that the APS Commission present a detailed report annually, as part of the *State of the Service* report, outlining the progress made by each agency in achieving its training objectives.