



Education and Health Standing Committee

Putting VET to the test

**An assessment of the delivery of
Vocational Education and Training in Schools**

**Report No. 3
November 2017**

Legislative Assembly
Parliament of Western Australia

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An assessment of the delivery of Vocational Education and
Training in Schools

Report No. 3

Presented by

Ms J.M. Freeman, MLA

Laid on the Table of the Legislative Assembly on 30 November 2017

Chair's Foreword

THE Committee's report illustrates the impact, identified by the Auditor General in a 2016 report, of the major increase in the number of students undertaking vocational education and training courses in schools.

With growing focus in the education sector on student-centred outcomes, it is important to assess whether combining the education and training sectors in secondary school adequately meets the needs of students.

In particular, it is important to understand whether vocational education and training is simply being used as a source of non-ATAR curriculum, as a less challenging option or as a pathway to increased opportunities for employment.

The Productivity Commission's report into Australia's future, *Shifting the Dial*, released on 24 October 2017, outlined the need for schooling to provide a strong basis for education and training throughout life. Noting that the transitional economy will depend on high skills capacity, the Productivity Commission's key premise for education focus was to ensure a school system that delivered key foundations skills and a capacity to acquire knowledge throughout the expected changing nature of careers. Yet, given this broad knowledge agenda, the Commission also critiqued vocational education and training as 'struggling to deliver relevant competency-based qualifications sought by industry'.

This view underscores the complexity of delivering VET in secondary schools, where there is a merging of education and training perspectives on delivery, content, curriculum and assessment. While education is founded in developing aptitude and understanding, VET is applied work-focussed learning based on training packages that concentrate student learning to tasks. This may undermine the broad range of educational outcomes called for to manage a diverse career pathways outlined by the Productivity Commission.

These different modes of the education philosophies were clear from the Department of Education and the Department of Training and Workforce Development evidence; one emphasising teaching which delivers knowledge and skills, and the other training, based on units with assessable tasks.

Many years ago, the higher education system was transformed from a binary system, in which 'traditional' universities focussed on academic research and institutes of technology taught vocationally orientated courses. The debate that ensued around student outcomes as the driver for the university sector structure is surely one that needs to be applied to this growing sector of our secondary education delivery.

Perhaps more than anything, this inquiry has emphasised the vastness of the VET sector and the multitude of different entities that must work together to ensure it meets all of the required standards, as well as the needs of students and industry.

More than half of Western Australia's senior secondary students enrolled in at least 230 nationally approved qualifications last year. This increase in demand for VET, driven by the higher school leaving age and the new qualifying requirement for a Certificate II to gain a WA Certificate of Education for non-ATAR students, has come with an expansion in the range of courses.

This results in staffing challenges, as teachers in secondary schools are not accredited to deliver VET courses without a Certificate IV in Training and Assessment. With around 60 per cent of students in year 11 and 12 now undertaking VET courses, it would seem appropriate that graduate teachers have the capacity to meet the accreditation requirements included in their undergraduate qualifications.

VET qualifications are provided in a range of ways, but the majority of students learn from a teacher at their school. In line with national requirements, the training must be provided by a registered training organisation (RTO). Since most schools are not RTOs, they enter into auspicing relationships with private providers. The state training providers (TAFE colleges) have found it increasingly difficult to compete with private organisations and now provide only a small proportion of the training. The Committee noted the demonstrated risk associated with private RTOs, coupled with a renewed commitment by Government to TAFE and recommends that TAFE play a greater role in VET in schools.

The Committee was particularly concerned about the constraints on VET students in regional areas due to the smaller number of RTOs, workplace learning opportunities, transient students and difficulty in attracting and retaining suitably qualified teachers.

Having identified many challenges and tensions in delivering the VET program, the Committee sought to offer constructive suggestions to place the student at the centre of delivery of Vocational Education Training in Schools.

A handwritten signature in blue ink, appearing to read 'James Freeman', followed by a long horizontal flourish.

MS J.M. FREEMAN, MLA
CHAIR

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Executive Summary

IN the past 10 years, the proportion of year 11 and 12 students undertaking vocational education and training (VET) has doubled to around 60 per cent. Changes to the school leaving age have meant schools must now cater for students who may have otherwise left to pursue apprenticeships, TAFE studies or employment. This has led to an increase in demand for VET courses in schools.

Recent changes to Western Australian Certificate of Education (WACE) eligibility require students to complete at least four Australian Tertiary Admission Rank (ATAR) courses or a Certificate II qualification. As a result, schools must ensure that all VET pathway students have the opportunity to complete a Certificate II.

The majority of students (83%) enrolled in the VET in Schools (VETiS) program, introduced in 1997, are funded by the Department of Education (DoE). The Department of Training and Workforce Development (DTWD) funds the remaining students (17%), who are completing industry-supported qualifications through TAFE or school-based apprenticeships/traineeships or pre-apprenticeships. The DoE allocates around \$20 million to schools specifically for VETiS while the DTWD contributes almost \$30 million. But the cost of delivering VETiS is not actually known. Schools draw on a range of funding sources to allocate to VET as they see fit.

The divided funding arrangements are reflective of a broader division in regard to the purpose of VETiS. While the DoE sees VETiS as preparing students for the future by developing generalist career development skills that are transferable across a range of employment and training scenarios, the DTWD sees it as an introduction to employment in a specific industry or trade.

It has been pointed out that the term VET in Schools implies that the VET courses delivered to secondary students are different to VET delivered elsewhere, which is not the case. As such, the term VET should be used in preference to VET in Schools.

Delivery of VET to school students is varied and complex

School teachers deliver the majority of VET (70%) under an auspicing arrangement, whereby a registered training organisation (RTO) quality assures the delivery and assessment and issues the appropriate certificate. Most of the auspicing (80%) is provided by private RTOs, with the remainder provided by state training providers. Schools can also become RTOs, but the process is complicated with a heavy administrative burden. The DoE is looking at ways to alleviate this burden.

While schools like the auspicing arrangement because it gives them control over the learning environment, navigating and managing complex contracts is stressful. Support for school administrators is critical if auspicing remains the preferred delivery model.

At present, a handful of private RTOs provide more than half of the VET to schools. This poses a risk to course completion for thousands of students in the event that the RTO collapses or is deregistered. One of two regulatory bodies monitor the RTOs. The more vigilant of these – the state-based Training Accreditation Council – is responsible for only one-third of RTOs delivering to schools. The national Australian Skills Quality Authority is responsible for the other two-thirds, including the two largest providers.

School facilities must meet current industry standards before an RTO will agree to auspice the course. The high cost of providing courses that require specialist equipment has contributed to the popularity of easy-to-deliver courses such as business and sport and recreation. The DoE is exploring collaborative approaches, whereby a school develops facilities for a particular course that other schools can use. The DoE must ensure that this expands VET offerings so that a student's choice of courses is not restricted by virtue of the school he or she attends.

There is also potential for TAFE to play a bigger role. At present, TAFE's fee model for auspicing means it has to charge more than most private RTOs. This should be amended to make TAFE more competitive. The DTWD also provides funds to TAFE for a limited number of fee-free places for secondary school students, but these are restricted to a narrow range of industry-supported qualifications. The DTWD should investigate ways for secondary students to study a wider range of fee-free industry-supported qualifications through TAFE or other suitable registered training providers.

School delivery of VETiS is often limited by the availability of suitably qualified staff. Only around 14 per cent of secondary teachers currently teach VET. In addition to their teaching qualification, they require a Certificate IV in Training and Assessment and the VET qualification at or above the level they are teaching, which often has to be completed once they have begun their career. This could be addressed by amending the accreditation standards for initial teacher education programs (delivered by universities) to ensure they include a vocational teaching component.

There are challenges particular to delivering VET in regional schools

The proportion of year 12 students in regional and remote schools achieving a vocational qualification at Certificate II and higher was almost the same as in metropolitan schools, at nearly 60 per cent. But the participation rate is higher in the Kimberley, Mid West and Wheatbelt regions, and is also higher for Indigenous students, at 91 per cent.

The limited number of RTOs available for auspicing and off-site delivery affects VET delivery in regional areas. In recognition of this, the DTWD provides more TAFE places for secondary students in regional areas. The DoE is also investigating the feasibility of becoming an RTO to support schools in difficult to service areas.

Securing work placements for students is also more difficult in small communities with fewer businesses. However, opportunities can be expanded if schools offer VET courses aligned to local industries. Difficulties in getting to work placements could be resolved by establishing commercial enterprises on school sites, and providing programs to enable students to obtain a driver's licence – a particular challenge in regional areas.

The DoE needs to report on initiatives to address teacher retention, and consider mandating that all schools offer one or two common VET courses so that transient students can continue their studies when they move schools.

Aligning the needs of students and industry

Evidence received in regard to the completion of the Certificate II as a requirement for the WACE was not aligned. While it has some value as an educational outcome, the value for students seeking work depends largely on how it is perceived by the employer. Some in industry are not convinced that a single qualification delivers a better outcome than a collection of units across a number of different qualifications. This remains to be seen and should be monitored.

While the current needs of industry should not be ignored, there is also a place for transferable skills for use in industries not yet identified as areas of need. There is an opportunity for the education and training sectors to learn from one another through better integration of the two aspects of VET, delivering to students a mix of practical and classroom-based work skills. This is more likely to be achievable if responsibility for delivery and funding is also integrated.

There is also a need for closer ties between schools and industry to facilitate workplace learning and training and employment opportunities. Government agencies should also be encouraged to host work placements.

Student respondents to an online survey said that they valued their work placement experiences, but they could be difficult to organise. They would like to see a broader range of courses offered and felt that VET options were not very well promoted. The State Training Board agreed that the image of VET needed a boost.

Although employers could be considered the ultimate end users of VETiS, the program is intended to serve the needs of school students. The DoE needs to support schools in providing the best possible opportunity for students to achieve a valuable outcome.

Ministerial Response

In accordance with Standing Order 277(1) of the Standing Orders of the Legislative Assembly, the Education and Health Standing Committee directs that the Minister representing the Minister for Education and Training report to the Assembly as to the action, if any, proposed to be taken by the Government with respect to the recommendations of the Committee.

Findings and Recommendations

Finding 1

Page 15

The term VETiS (or VET in Schools) is misleading in implying a difference between mainstream VET and VET delivered in schools.

Recommendation 1

Page 15

The Department of Education cease using the term VETiS or VET in Schools and refer to vocational education and training delivered in secondary schools simply as VET.

Finding 2

Page 22

The concentration of a large amount of VET in Schools delivery in the hands of a few private registered training organisations puts too many students at risk of course non-completion or disruption in the event that the organisations collapse or are deregistered.

Recommendation 2

Page 25

The Department of Education must ensure that it maintains up-to-date guidelines and support materials to help schools navigate and manage the complexities of auspiced delivery arrangements with registered training organisations.

Finding 3

Page 29

Training provider failure still poses a risk to schools, students and parents, given the long auditing intervals and the fact that only a third of registered training providers delivering courses to school students are under the more watchful eye of the state-based regulator.

Finding 4

Page 33

The range of VET courses students can study at school is limited by the lack of access to specialist facilities.

Recommendation 3

Page 33

The Department of Education must ensure its investigation of collaborative models results in practical ways for schools to expand their VET offerings and increases equity of access.

Finding 5

Page 38

One of the reasons many schools choose to be auspices by private registered training organisations rather than TAFE is because they are cheaper.

Recommendation 4 **Page 38**

The Department of Training and Workforce Development should consider amending the fee model used by TAFE for auspicing schools to ensure that TAFE can compete with private registered training organisations offering a similar service.

Finding 6 **Page 38**

Many students miss out on obtaining fully funded places in industry-supported qualifications at TAFE, and are unable to afford the high course fees.

Recommendation 5 **Page 38**

The Department of Training and Workforce Development should investigate ways to create more capacity for secondary students to study a wider range of fee-free industry-supported qualifications through the state training providers or other suitable registered training providers.

Recommendation 6 **Page 45**

The Teacher Registration Board of Western Australia consider amending its accreditation standards for initial teacher education programs to include a vocational teaching component for secondary teachers, either as an elective or a core unit.

The Minister for Education and Training could consider this as part of the current statutory review of the *Teacher Registration Act 2012* (WA).

Finding 7 **Page 47**

The extra qualification and vocational currency requirements for VET teachers are exacting a toll on teachers and challenging school resources.

Recommendation 7 **Page 47**

The Training Accreditation Council considers amending its *Users Guide: Standards for Registered Training Organisations 2015* to direct registered training organisations to take into account the particular concerns of secondary school VET teachers in regard to maintenance of industry currency requirements.

Finding 8 **Page 54**

Linking VET in Schools qualifications to local needs can provide a useful transition to work in local communities.

Recommendation 8 **Page 55**

The Minister report to the Parliament on any progress being made in regard to the suggestion to establish businesses at regional schools which could provide employment opportunities for VET students.

Finding 9 **Page 55**

Educational outcomes are impacted by the incapacity of many students in regional areas to obtain a driver's licence.

Finding 10 **Page 57**

The difficulty in attracting and/or retaining qualified teachers threatens the delivery of VET qualifications in regional and remote schools.

Recommendation 9 **Page 57**

The Minister for Education and Training report back on initiatives to attract and retain VET qualified teachers in regional and remote schools.

Recommendation 10 **Page 59**

The Department of Education considers mandating that public secondary schools offer at least a few Certificate II courses that are common to all schools, so that students can move between schools and still be able to meet WACE requirements for completing a Certificate II.

Recommendation 11 **Page 63**

The Department of Education and the School Curriculum and Standards Authority should monitor whether the requirement to complete a Certificate II in order to graduate is delivering the best post-school outcomes for students.

Finding 11 **Page 64**

By focussing only on current industry-supported qualifications, the Department of Training and Workforce Development risks producing secondary school students that are ill equipped for future industries.

Finding 12 **Page 64**

The aspects of vocational learning and industry-specific training are not well integrated in secondary schools.

Recommendation 12 **Page 64**

Consideration should be given to greater integration of the Department of Education and the Department of Training and Workforce Development to:

- a) Ensure philosophies on the education of secondary school students are aligned
- b) Focus resources on providing a range of course and workplace opportunities that will cater to the educational and training needs of secondary school students.

Chapter 1

VET in Schools is expanding along with views about its purpose

Since the VET in Schools program was introduced in Western Australia in 1997 as an alternative pathway to mainstream academic schooling, participation has increased markedly. In 2000, around 7000 year 11 and 12 students studied a VET unit.¹ By 2016, that figure had grown to over 30,000, with yearly incremental increases (see Figure 1.1).

The proportion of senior secondary school students undertaking a VET unit has also grown. While in 2006 around a third of year 11 and 12 students studied a VET unit or qualification, by 2016 this had doubled to almost 60 per cent. As shown in Figure 1.2, the proportion for government schools is even higher, at 74 per cent.

Changes to the school leaving age introduced between 2006 and 2008 (see Box 1) contributed to the increase, with students who would have otherwise left school at the end of year 10 taking part in alternative education or workplace activities through the VET in Schools program. In 2014 the school leaving age was increased again. This saw 80 per cent of students continuing to year 12 in 2015, compared with 63 per cent in 2005.²

Training programs considered part of **VET in Schools** are those which:

- provide credit toward a recognised VET qualification within the Australian Qualifications Framework (AQF)
- are undertaken as part of a senior secondary certificate i.e. the Western Australian Certificate of Education (WACE)

VET courses are nationally recognised qualifications ranging from Certificate I through to graduate diploma. Usually only Certificates I, II or III are completed at school.

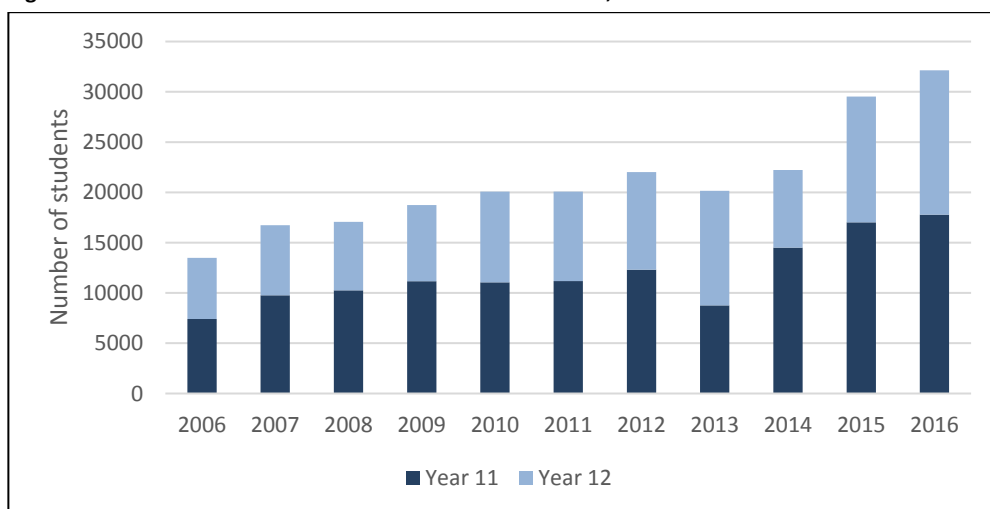
- Certificate I and II – skills and knowledge for an entry-level job
- Certificate III and IV and Diploma – for more specialised jobs e.g. in trades or technology areas
- Advanced diploma, graduate diploma – more complex level of skills and knowledge

1 Curriculum Council, *Annual Report 2000–2001*, August 2001.

2 Office of the Auditor General Western Australia, *Vocational Education and Training for Year 11 and 12 Students in Public Schools*, December 2016, p14.

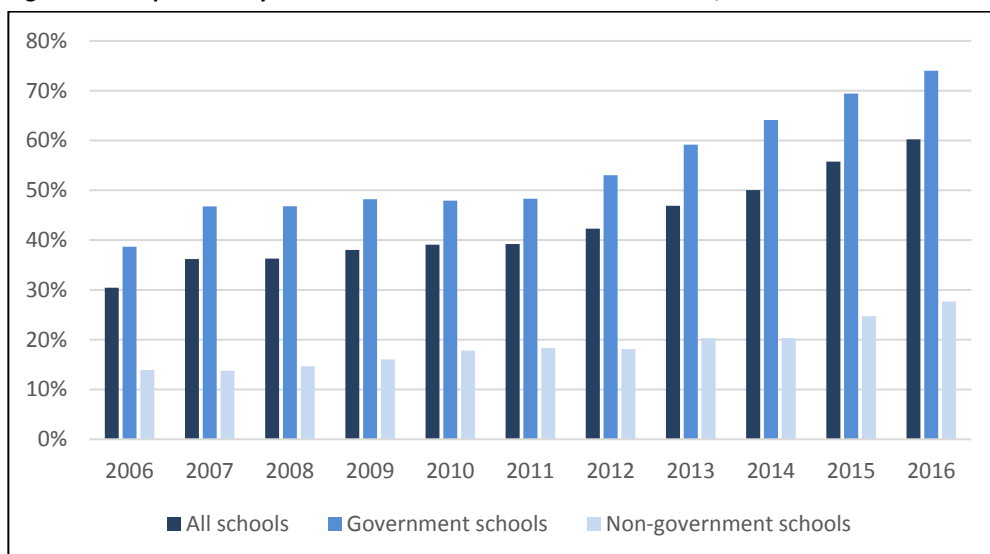
Chapter 1

Figure 1.1: Number of school students enrolled in a VET unit, 2006–2016³



Source: Data for chart sourced from the School Curriculum and Standards Authority.

Figure 1.2: Proportion of year 11 and 12 students enrolled in a VET unit, 2006–2016



Source: Data for chart sourced from the School Curriculum and Standards Authority.

A Joint Ministerial Statement on VET in Schools issued in 2014 noted that the rapid expansion of VET in Schools had not been adequately supported with a clear strategic direction that would take account of student needs.⁴ Since then, new requirements for the WA Certificate of Education (WACE) have been introduced. As of 2016, students

³ Note, the dip in numbers in 2013 and 2014 corresponds to the half-cohort of students being in year 11 and year 12.

⁴ Department of Training and Workforce Development and Department of Education, *Joint Ministerial Statement of Vocational Education and Training in Schools*, Department of Training and Workforce Development, 2014.

BOX 1: Compulsory school age

The age at which students could legally leave school was raised from 15 to 16 in 2006 and then to 17 by 2008.

School attendance is now compulsory from the beginning of the year in which a child will turn 5 years 6 months until the end of the year in which the child reaches 17 years 6 months, or until the student reaches the age of 18, whichever happens first.

Students must be participating in full-time approved education, training, employment or a combination of options during the last two years of compulsory education.

Students who wish to leave school before the end of year 10 and pursue an alternative such as an apprenticeship must apply to the Education Department for an exemption. If they wish to leave during year 11 or 12, they must submit a notice of arrangements and obtain the Minister's approval.

seeking to graduate with their WACE need to have completed at least four Australian Tertiary Admission Rank (ATAR) courses or a Certificate II in an accredited VET qualification. This has meant providing opportunities for students in all schools to complete a Certificate II (or higher) to ensure they are eligible to receive their WACE. These new requirements make strategic oversight of VET in Schools all the more necessary.

In 2016, 42 per cent of year 12 full-time students eligible for WACE required VET to achieve their WACE.⁵ There were 140 secondary schools in which every year 12 student who was not following the ATAR pathway completed a Certificate II or higher to achieve a WACE. In addition to this are a small proportion of students who study VET subjects even if not required for WACE graduation. More detail about who participates in VET is provided in the next section.

The way in which schools are resourced to deliver VET is complex, which makes it difficult to determine adequacy of funding. The majority of funds (83%) are provided by the Department of Education (DoE), with the Department of Training and Workforce Development (DTWD) providing the balance.

The funds provided by the DTWD are for a quite specific purpose, however, in that they are allocated to students undertaking VET qualifications that are part of an apprenticeship or traineeship or that are supported by industry on the basis of being areas where skills are needed.

The DoE's view of the purpose of VET in Schools is broader, encompassing career education programs and generic work skills. The ramifications of two potentially

5 Submission No. 17 from Prof Patrick Garnett, School Curriculum and Standards Authority, 7 August 2017, p5.

Chapter 1

conflicting perspectives sharing the same space are explored later in this chapter, and the appropriateness of the VET in Schools label is also contemplated.

Chapter Two focuses on delivery. The increase in demand for VET prompted by the higher school leaving age and the change to WACE requirements has of course boosted demand for vocational training providers. The number of registered training organisations (RTOs) providing services to schools has more than doubled from 84 in 2001 to 183⁶ currently. The proportion that are private providers has also changed significantly, accounting for just under half of the RTOs listed in 2001 but for around 80 per cent in 2016.⁷

The Committee heard about various delivery models, including the option for schools to become RTOs and the far more common scenario in which schools deliver the training but are auspiced by an RTO. The adequacy of monitoring of RTOs is considered, given that there have been some recent high profile cases of training providers collapsing or being deregistered and leaving students temporarily stranded.

Chapter Two also looks at the requirement for specialist facilities for some VET courses, and the extent to which this may limit choice for VET students. The Committee also considers the current role that TAFE plays in VET in Schools, and whether this might be expanded.

Finally, Chapter Two investigates who is best placed to teach VET – school teachers or trainers from a trade background – and considers the burden on secondary school teachers who undertake to teach both the academic and the VET courses.

The unique challenges experienced by schools delivering VET in regional WA are investigated in Chapter Three. The inquiry considered the effect of fewer training providers, limited work placement opportunities, high staff turnover and student transiency on the experiences of VET students outside the metropolitan area.

Lastly, Chapter Four considers the extent to which the program is meeting the needs of students and industry, and what it should in fact be seeking to deliver. It presents for consideration some suggestions for improving the delivery and management of VET in Schools, to ensure that students who do not choose the academic pathway are being provided with skills that will serve them well in the future.

6 Ms Stephanie Trestrail, Training Accreditation Council, Letter, 23 October 2017.

7 Curriculum Council, Secondary Education Statistics (Years 11 and 12) 2001, Table 5.16 - Registered Training Organisations Offering Units of Competency/National Training Modules to Students, 2002, Curriculum Council, Perth, Western Australia; also School Curriculum and Standards Authority, Statistical Reports, Table 5.6 - Number of students who completed at least one VET unit of competency at a Registered Training Organisation, 2016, available from www.scsa.wa.edu.

There are many ways to participate in VET

Students can make up their upper school course load in many different ways, depending on their post-school ambitions. The two pathways most commonly referred to are the ATAR pathway and the VET pathway, reflecting the two ways to achieve the WACE. But many students do a combination of courses and even VET students – including those who have started an apprenticeship – do not complete a course load made up entirely of VET courses or units. For most students, VET comprises less than one third of the weekly timetable.⁸

Students following either pathway who want to achieve the WACE must complete at least 20 course units, including a minimum number of units from both the English/humanities and maths/science areas. They must achieve the required literacy and numeracy standard (by either an acceptable year 9 NAPLAN result or successful completion of the OLNA⁹ test) and a minimum of 14 C grades or higher.¹⁰

No more than eight VET units (four in year 11 and four in year 12) are allowed to contribute to the 20 required units on a credit transfer basis. However, more VET units can contribute to WACE if they are completed as part of a VET industry specific course (VETISC). There are 10 of these courses on offer to school students and they are made up of Certificate I, II and III qualifications. Units are only credited once the entire qualification has been completed. While VET units are not graded, they count as a C grade and contribute towards the 14 C grades requirement.

VET students hoping to continue or begin an apprenticeship, enrol in TAFE or enter the workforce after year 12 would generally complete the requisite English/humanities and maths/science units via the General stream, rather than ATAR units. However, combinations of ATAR, General and VET courses are possible, and in some cases students switch courses between year 11 and year 12, expanding the permutations of courses contributing to WACE even further. A list of some of the possible combinations, as outlined by the School Curriculum and Standards Authority, is provided in Appendix Seven.

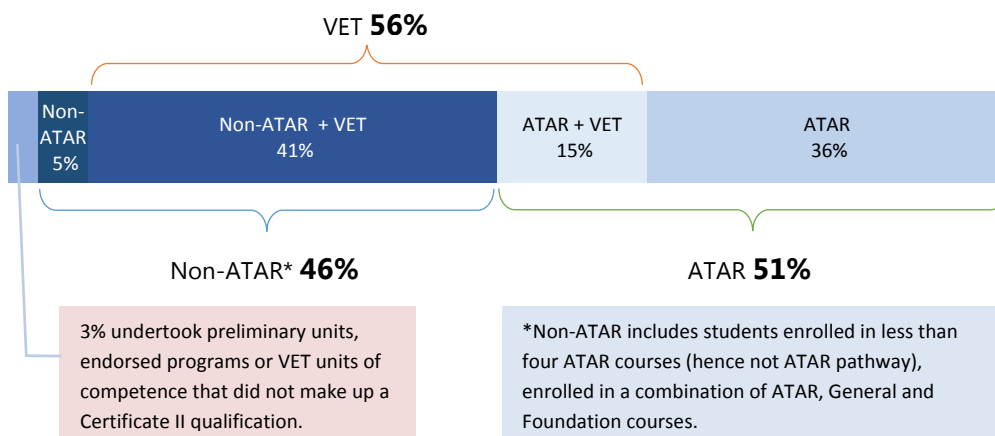
8 Submission No. 15 from Department of Education, 7 August 2017, p1.

9 The Online Literacy and Numeracy Assessment, developed by the School Curriculum and Standards Authority.

10 Students who complete year 11 and 12 but do not meet the criteria for WACE graduation will still receive the WA Statement of Student Achievement, which provides a formal record of their upper school education and results.

Chapter 1

Figure 1.3: Proportion of year 12 students enrolled in each pathway in 2017



Source: Data supplied by School Curriculum and Standards Authority

The majority of students (94%) undertake training where there is no formal employment arrangement. This is commonly referred to as institutional-based training or classroom-based delivery. However, there is sometimes a workplace learning component – and in fact, for the 10 VETISC courses, workplace learning is mandatory. The number to be completed varies according to the qualification. The workplace learning component of the course contributes as unit equivalents towards the WACE.

The other 6 per cent of students complete their VET studies as part of a formal employment training arrangement, such as a school-based apprenticeship or traineeship or a pre-apprenticeship.

Students who enter into a contract with an employer to undertake a school-based apprenticeship (SBA) or school-based traineeship (SBT) are regarded as full-time students but spend one or two days a week completing training at the workplace or at TAFE or a private training provider.¹¹ Like students undertaking classroom-based training, they are working towards a Certificate II or Certificate III qualification. A traineeship may be completed while still at school, but an apprenticeship will generally be completed after leaving school.

Pre-apprenticeships in schools (PAiS) are Certificate II programs that provide a pathway from school to related apprenticeships. Students attend school, train at a registered training organisation (RTO) and are linked to an employer for work placement. The RTO coordinates the work placement in partnership with the school.

¹¹ Department of Training and Workforce Development, *Fact Sheet for Students – School-based apprenticeships and traineeships*, May 2016.

There is also an Aboriginal school-based training program (ASBT) which is identical to the SBA and SBT program (except that the training is completed with a Group Training Organisation, who pays the student for their time at work). A training program to prepare Aboriginal students for an apprenticeship or for further study is also provided.

In 2016, secondary school students enrolled in 231 different Australian Qualifications Framework (AQF) qualifications.¹² The bulk of the qualifications awarded as part of the VETiS program in 2016 were Certificate II level qualifications. In 2016, Certificate I and II qualifications constituted 82 per cent of all VETiS qualifications awarded, while Certificate III qualifications constituted 15 per cent of all qualifications awarded.¹³

The cost of delivering VET in Schools is not actually known

Funding for VET in Schools is split between the Department of Education (DoE) and the Department of Training and Workforce Development (DTWD) in a complex arrangement that has continued to cause confusion for schools and industry stakeholders.¹⁴

DTWD funds VET for all students undertaking apprenticeships and traineeships, and provides what is known as profile funding for a limited number of students to attend TAFE to study industry-supported qualifications. This accounts for 17 per cent of VETiS delivery, with the other 83 per cent funded by the DoE.

In dollar terms, however, the contributions of each department are not so far apart. In 2016 the DTWD spent \$29.5 million, with around two-thirds (\$19.9 million) spent on profile places and one-third on apprenticeships and traineeships.

In 2016, the DoE allocated \$19.8 million of Targeted Initiative (TI) funding specifically to VETiS, in addition to the per-student amounts distributed through the Student Centred Funding Model.¹⁵ While it is up to school principals to determine how they use the funds, the TI funding is intended for teacher training, for staff to manage workplace and off-site programs, and for contracting partnerships with RTOs.

The TI amount given to each school is based on the number of students enrolled for year 11 and 12 who were at or below the 70th percentile in NAPLAN when in year 9. The amount per student reduces as the number of VET students enrolled at a school

12 Submission No. 17 from School Curriculum and Standards Authority, 7 August 2017, p7.

13 Submission No. 13 from Mr Jim Walker, State Training Board and Industry Training Council network, 7 August 2017, p6.

14 *ibid*, p9.

15 Submission No. 15 from Department of Education, 7 August 2017, Attachment 4.

Chapter 1

increases.¹⁶ This takes into account the economies of scale associated with larger cohorts of students.

Students below the 70th percentile in NAPLAN would not be pursuing the ATAR pathway and would be more likely to be taking VET courses. And yet, 15 per cent of students studying VET are in fact ATAR students. These students do not attract TI

Now, they fund you on students loosely around a model that is based on their NAPLAN results. So they take the kids that are lower on the NAPLAN scale and say, 'You've got roughly this percentage kids in your school with a NAPLAN below this level, and we will give you about this amount of money. Make it work, stretch it as big as you can.' Before, you could enrol even 100 per cent of your students in VET and you would actually get funded for all of them to do, maybe, a cert I. Now you get a bucket of money, and you have to spread it as best you can.

- Janette Gee, president, WASSEA

funding, but according to the DoE, if a school wishes to have more students studying VET than the base number of their TI this can be achieved by creating financial efficiencies to lower the cost per student, accommodating additional students.

However, the WA Council of State School Organisations says it is far less common now for schools to accommodate ATAR students wanting to complement their studies with a certificate course, with the family often left to pay.¹⁷

Nevertheless, the director general of the DoE says money for VET is a finite resource and judgements had to be made about its best application. Funding ATAR students who did not require a Certificate II to qualify for WACE was not considered a good use of their resource.¹⁸

According to a former principal, now DoE executive, schools work out 'how to extract every possible resource right across government, both from our department and others, to run those (VET) programs'.¹⁹

An unintended consequence of two departments allocating funds according to separate policies is double dipping. This can occur when students who have attracted TI funding through the DoE are also funded to study at TAFE through the DTWD's profile hours.

16 For example, schools with 50 or fewer VET students will receive the highest allocation per student. Schools with 200 or more VET students will receive the highest allocation per student for the first 50 students, a reducing allocation per student for the next 150 students, and the base allocation for each student over 200.

17 Submission No. 19 from Ms Kylie Catto, WA Council of State School Organisations, 10 August 2017, p2.

18 Ms Sharyn O'Neill, Department of Education, *Transcript of Evidence*, 13 September 2017, p13.

19 Mr Lindsay Hale, Department of Education, *Transcript of Evidence*, 13 September 2017, p11.

This has been difficult to address because schools have not known how many profile places, and for which qualifications, will be available for their students prior to course counselling processes in May each year.

One industry training provider said it opened applications for its course during term three of the school year but would not know how many places had been funded until December of that year. This could lead to disappointment for students who were accepted on to the course conditional on receipt of funding, who then had to be removed if funding did not eventuate.²⁰

The departments are working to establish a process that will give schools more certainty in planning their VET offerings, and ensure that funding through the VET TI is not allocated for profile places. The DoE said that this funding could then be directed to schools with low profile numbers, and/or to regional and remote areas where the costs of RTO services and staff training are higher.

A review of VET in public schools commissioned by the DoE concluded that the department could more effectively direct the activity delivered by the VET program if it had direct control over all funding, including profile places.²¹ But the DTWD has made a conscious decision to align VET delivered in schools to the VET programs it delivers outside of school – that is, to the state industry priorities. The Committee suggests that maintaining control of profile hours offered to schools may be a way of assuaging industry concerns that courses offered in school remain relevant to industry.

In 2015, the DTWD funded 7411 course enrolments for approximately 1.6 million profile hours.²² DTWD's profile hours focus on vocational qualifications that have employment outcomes or lead to further training, and not qualifications such as business and sports and recreation. This is:

*to enable TAFEs to focus on offering more specialised qualifications that are best delivered by industry qualified lecturers with appropriate supporting infrastructure.*²³

In regional areas, however, there is some flexibility that takes into consideration the limited course and delivery options. Delivery to students at RTO Schools is negotiated

20 Submission No. 6 from MPA Skills, 4 August 2017, p2.

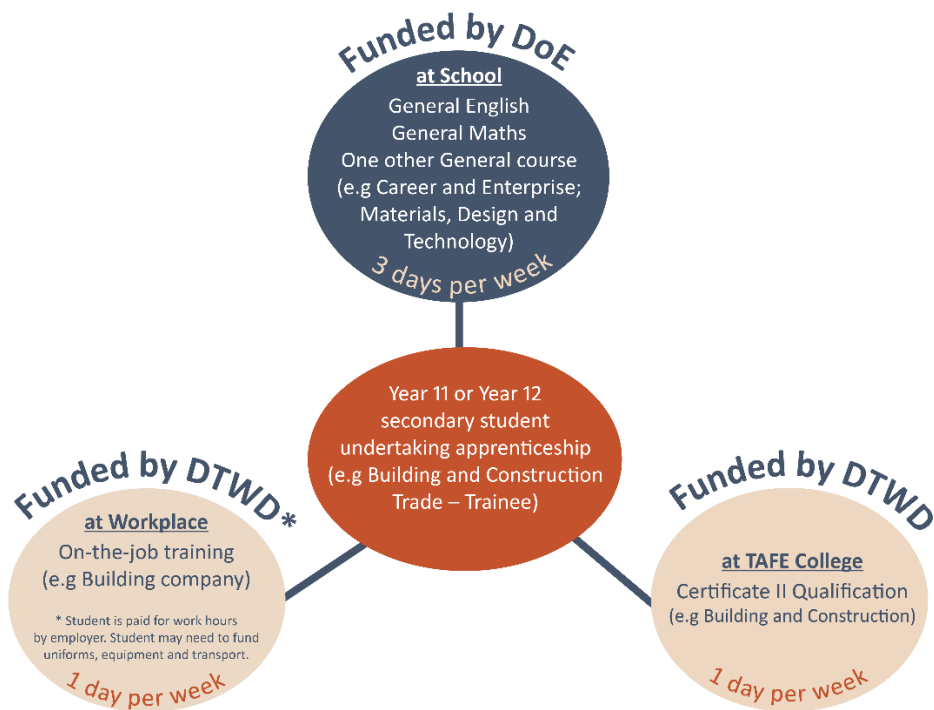
21 Nous Group, *Review of VET in WA public schools*, commissioned by Western Australian Department of Education, 28 June 2016.

22 Office of the Auditor General Western Australia, *Vocational Education and Training for Year 11 and 12 Students in Public Schools*, December 2016, p22.

23 Submission No. 16 from Ms Anne Driscoll, Department of Training and Workforce Development, 7 August 2017, p4.

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Figure 1.4: Example of how one type of VET student is funded for different components.



DoE = Department of Education; DTWD = Department of Training and Workforce Development

Note: There are many combinations of courses and units a student can undertake to make up the required units. In some cases, a student's studies may be entirely funded by the Department of Education. See Appendix Seven for more course combinations. Graphic credit: Sarah Smith.

on a case-by-case basis, to free up delivery at non-RTO schools that cannot deliver VET courses in their own right.²⁴

The DoE does not know how schools actually use VET TI, but finding this out is part of a work plan developed following two external reviews. It also does not know how much schools actually spend on delivering VET, either individually or collectively. Apparently, these figures are too difficult to pin down, partly because of the many different components that make up a single student's school workload.

it is quite difficult to pull apart, for a student that is doing the general education and some VET, the component pieces, student by student,

24 Submission No. 16 from Ms Anne Driscoll, Department of Training and Workforce Development, 7 August 2017, p4.

*because you would have to build it up from the ground to make a total cost, and we do not have that.*²⁵

Isolating the administrative costs (including administrative staff) associated with VET would also be challenging. Working out how much schools are spending collectively would require a ‘forensic audit across every school’²⁶ and the instability of the student cohort would mean the costs would change day by day.²⁷

Hence, we have a situation in which the DoE is providing funds to schools for VET without really knowing how much it is costing to deliver, with some students being funded twice.

Can all views on the purpose of VETiS be accommodated?

There are differing views regarding the purpose of VETiS, falling broadly into two categories: as a means of providing generic work skills and competencies, or as a way of introducing industry specific knowledge. This division is probably not helped by the fact that VETiS is delivered by two departments – one that looks after the interests of schools and education and one that looks after the interests of industry and training.

However, in their submissions both departments have made a point of acknowledging that VETiS has a range of purposes, while at the same time making clear what they see as their role and their priorities in its provision.

The Department of Education (DoE) has a broad view of the purpose of VETiS as it forms part of its wider mandate in providing an education to its students which will ‘prepare students for the opportunities and challenges of the future economy, as well as supporting their development as active and responsible citizens.’²⁸ It is clear that DoE sees VET as part of this preparation by providing ‘opportunities, experiences and skills development that are transferable across a broad range of post-school employment, training and higher education options’.²⁹

... for the majority of senior secondary students in public schools, the power of VET lies in the way it prepares them for a range of post-school options or pathways. For these students, what matters most are the generic skills and competencies they develop by participating in VET, more so than the specific industry area knowledge they gain by completing their qualification.

- Department of Education submission

25 Ms Sharyn O’Neill, Department of Education, *Transcript of Evidence*, 13 September 2017, p10.

26 Mr Lindsay Hale, Department of Education, *Transcript of Evidence*, 13 September 2017, p10.

27 Ms Sharyn O’Neill, Department of Education, *Transcript of Evidence*, 13 September 2017, p10.

28 Submission No. 15 from Department of Education, 7 August 2017, p1.

29 *ibid.*

Chapter 1

It is important to note that the DoE's key performance indicators include the following effectiveness indicators:

1. Rate of participation in education
2. Retention in public school education
3. Secondary graduation rate
4. Student achievement in literacy
5. Student achievement in numeracy³⁰

Schools have always prepared students for work; however, preparation for the workforce does not form a measurable component of the DoE's operations.

Juxtaposed to this are the views held largely by industry, which sees VETiS primarily as being an introduction to employment in an industry or a trade. The DTWD articulates the views of industry thus:

They have a very specific view that VET in schools is there as a pathway into employment, and to their sectors by and large, so they are very focused on that...

The DTWD acknowledges that 'the purpose of VET in schools may not be only to train students for a job', but in terms of the department's involvement, vocational courses are the priority:

in terms of our allocation of our funded places, which is in the order of \$29.5 million, it is very specifically on vocationally orientated training. Just over the last year we have tightened that up so that going into 2017, we are not funding, particularly in the metro, students who are doing the business, the sport and recreation, the design and visual arts courses – that is just not on.³¹

One industry submission said that VETiS graduates were regarded as having been trained with some vocational competence, but not as being qualified to industry standards.³² Broadly speaking, industry values students who meet industry requirements. As one VET trainer and assessor noted:

30 Department of Education, *Annual Report 2015–2016*, Western Australia, p66.

31 Ms Anne Driscoll, Acting Director General, Department of Training and Workforce Development, *Transcript of Evidence*, 13 September 2017, p2.

32 Submission No. 1 from Apprenticeship and Traineeship Company, 20 July 2017, p2.

*Industry expectation means industry believes that a VET qualification has given the student a good understanding and has developed the student's skills and knowledge which will allow them to fit in to industry with little or no training ...*³³

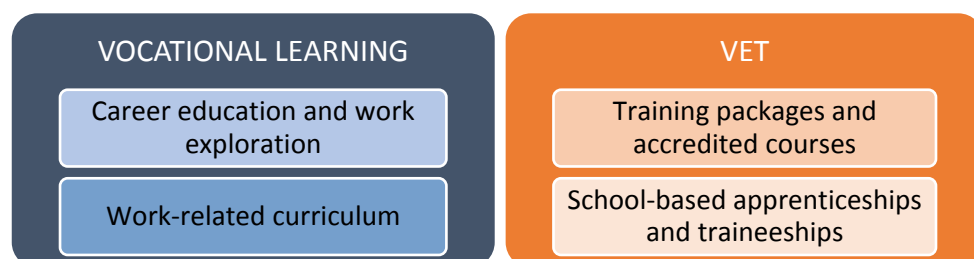
These views are not consistent across all industry though. For instance, the Financial, Administrative and Professional Services (FAPS) Training Council believes that VETiS should not be considered solely in the context of occupational outcomes immediately on completion of secondary schooling, and that training should be skilling for job clusters, not individual occupations.

The FAPS believes that training qualifications suitable for school delivery do not directly align to most state priority occupations. It says that generalist, entry level training in schools can be seen as a long term, adaptable and flexible pipeline of supply to a range of professions.³⁴

This view represents the middle ground which the two departments should be seeking to occupy. The binary model (as represented in Figure 1.5) in which vocational learning (career education and work skills) and VET (industry courses) are separate does not necessarily meet the needs of students, who will need a combination of these skills to serve their future needs.

As different interest groups jostle for their place in the system, the two departments try to ensure that various interests are being met and, in all likelihood, protect their own patch. But in the end it is the students' needs that should be front and centre, and this might require consideration of how to integrate not only the practical delivery of education and training but also the underlying philosophies. This will be discussed further in Chapter Four.

Figure 1.5: The two types of vocational education delivered to secondary students, as conceptualised by the Education Council.³⁵



33 Submission No. 11 from Ms Corrine Brown, 7 August 2017, p2.

34 Submission No. 13 from The Financial, Administrative and Professional Services (FAPS) Training Council (appendix to State Training Board and ITC network submission), 7 August 2017, p18.

35 Based on diagram created by the Education Council and published in *Preparing Secondary Students for Work*, Education Services Australia, 2014, p7.

Chapter 1

VETiS is the same as VET

The DoE has articulated its desire for a greater understanding of VET beyond the school community:

One thing for us that would be helpful to us is to have a greater shared understanding outside of education – parents, for example, the community, industry – on that wide range of purposes of VET, and they are all valid in their own right.

This view of purpose would align with the views of the Western Australian Council of State School Organisations:

We also know that some ATAR (Australian Tertiary Admission Rank) students are also studying the certificates. VET is a wonderful opportunity to complement or to provide an alternative route/pathway to graduation, TAFE or university.³⁶

It has been suggested that the name VETiS should not be used as it is unnecessary in its distinction from VET delivered outside of a school setting. The SCSA argues that in consideration of the broad application of VET and the quality requirements which apply equally to school-based students and non-school based students, the term should not be used:

The term VETiS implies that this delivery is somehow different from other forms of VET delivery. ACACA,³⁷ in support of the Schools Vocational Learning and Training working group position documented in the Preparing Secondary Students for Work, recommends a movement away from the acronym/term VETiS. Instead, use of the terminology 'VET delivered to senior secondary students' should be used.³⁸

The recognition that VET delivered to secondary students is the same as all other VET is a vital component of the Federal Government's framework underpinning the policy document *Preparing Secondary Students for Work*:³⁹

Underlying many of these concerns is the fundamental question of definition. The terms 'VET in Schools' and 'VETiS' are widely used, but

36 Submission No. 19 from the Western Australian Council of State School Organisations Inc, 9 August 2017, p2.

37 Australasian Curriculum Assessment Certification Authorities.

38 Submission No. 17 from School Curriculum and Standards Authority, 7 August 2017, p11.

39 *Preparing Secondary Students for Work: A framework for vocational learning and VET delivered to secondary students*, Education Services Australia 2014, as the legal entity for the Education Council.

contribute to the misconception that VET delivered to secondary students is different from all other VET.

Another important aspect of this framework is the recognition that not all VET has the same purpose:

The lack of clear terminology also contributes to the differing views among stakeholders about the purpose, expectations, outcomes and responsibility of 'VETiS', as they are often using the same term to talk about different activities that do have different purposes.

If common and consistent terminologies were to be adopted it would alleviate the misunderstandings surrounding the purpose of VET.

Preparing Secondary Students for Work defines vocational learning as 'including career education programs, through which secondary students explore the world of work, identify career options and pathways, and build career development skills'.⁴⁰

Vocational education and training is defined as that which 'enables students to acquire workplace skills through nationally recognised training described within an industry developed training package or an accredited course. The achievement of a VET qualification signifies that a student has demonstrated competency against the skills and knowledge required to perform effectively in the workplace.'

Therefore, according to one submission, the distinction should be between school-based vocational learning (year 9-12 national curriculum and related preparation for the world of work efforts) and mainstream vocational education and training, and the term VETiS should be replaced with the terms vocational learning or VET.⁴¹ The Committee is of the view that the term VET should be used to cover mainstream VET as well as vocational learning, so as not to perpetuate a division between these two aspects of vocational education.

Finding 1

The term VETiS (or VET in Schools) is misleading in implying a difference between mainstream VET and VET delivered in schools.

Recommendation 1

The Department of Education cease using the term VETiS or VET in Schools and refer to vocational education and training delivered in secondary schools simply as VET.

⁴⁰ *Preparing Secondary Students for Work: A framework for vocational learning and VET delivered to secondary students*, Education Services Australia 2014.

⁴¹ Submission No. 23 from Mike Frost and Associates, 23 August 2017, p10.

Chapter 2

Delivery is varied and complex

Partnerships between schools and private training organisations are the most common form of VETiS delivery

VET can be delivered to students at secondary school using school facilities, or off site. For on-site delivery, teachers already employed by the school are almost always responsible for teaching the course or unit.

Since all VET must be delivered by a registered training organisation (RTO), schools that want to deliver VETiS using their own facilities and teaching resources can either become an RTO or be auspiced by an RTO. Under an auspicings arrangement, school teachers deliver and assess the training and the partner RTO quality assures the delivery and assessment and issues the appropriate certificate. This is the most common model for delivery of VETiS in WA.

Most students who undertake VET units off site have either received funding from the Department of Training and Workforce Development (DTWD) to study specific industry-supported courses at TAFE, or are completing a traineeship or apprenticeship. The classroom learning component of a traineeship or apprenticeship may be delivered by a private RTO or by TAFE.⁴² A very small number of students (135) received no government funding towards their VETiS studies.⁴³ They may have paid the full fee to TAFE or a private RTO to study a course not funded through their school.

The auspicings arrangement is favoured by schools because it gives them control over timetabling and the learning environment. Sending students off site presents logistical and duty of care challenges. Auspicings is also cheaper, usually costing only a few hundred dollars per student,⁴⁴ while sending students off site can cost thousands of dollars if it is not part of a DTWD-funded qualification.

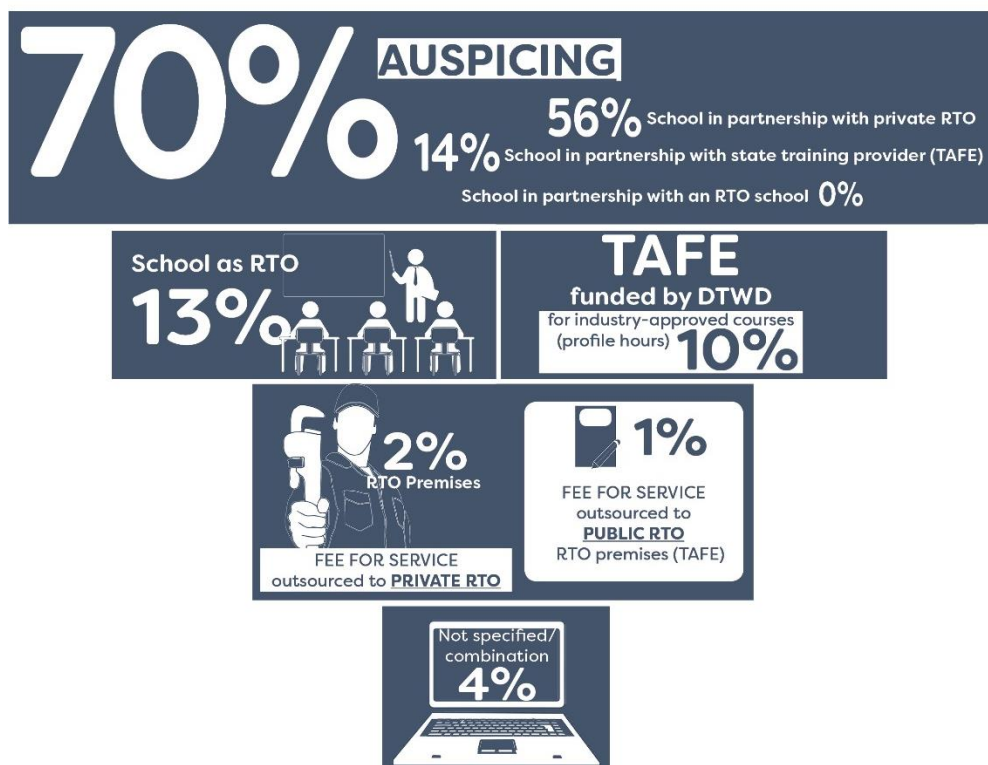
42 Overall, TAFE delivers just under half (48%) and private RTOs deliver the balance. However, TAFE delivers the majority of the VET units for school-based apprenticeships (83%) and for pre-apprenticeships (76%). The proportion of training it delivers for school-based traineeships is much lower (25%).

43 National Centre for Vocational Education Research (NCVER), *Australian vocational education and training statistics: Data Slicer: VET in Schools, 2016*, NCVER, Adelaide.

44 Office of the Auditor General Western Australia, *Vocational Education and Training for Year 11 and 12 Students in Public Schools*, December 2016, p7; Submission No. 20 from Miss Samantha Schofield, State School Teachers' Union of WA, 9 August 2017, p8.

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Figure 2.1: VETiS delivery arrangements in 2016



Source: Created from data sourced from Department of Education (Letter, 13 October 2017) and Department of Training and Workforce Development (Submission, p2). Graphic credit: Sarah Smith.

Highly specialised courses, such as aviation and electrotechnology, are not considered suitable for auspicing because it is too difficult to ensure the delivery is of a high standard. Schools out-source delivery of these sorts of courses to TAFE or to private providers.⁴⁵

Becoming a registered training organisation is a burden for schools

The only alternative to auspicing or outsourced delivery is for the school to become an RTO (and even then, these schools may also engage in auspicing arrangements for particular courses). In WA, only 18 public schools,⁴⁶ four independent schools⁴⁷ and one

45 Miss Samantha Schofield, State School Teachers' Union of WA, *Transcript of Evidence*, 6 September 2017, p6; Mrs Kathleen Hoare, Director, State Training Board, *Transcript of Evidence*, 6 September 2017; Mr Domenic Camera, Principal, Australind Senior High School, *Transcript of Evidence*, 6 September 2017, p14.

46 This figure includes the five WA College of Agriculture schools.

47 Submission No. 22 from Mr Wade McLeod, Association of Independent Schools WA, 16 August 2017, p3.

Catholic school⁴⁸ are RTOs. These schools can auspice other schools, although at present there are none doing so.

The process to become an RTO school is complicated. Before applying to the Training Accreditation Council (TAC), the school must complete a business case identifying its proposed delivery profile and parameters of operation, which the director general of the Department of Education and the Minister for Education and Training must approve. (A business case and approval is also required for any proposed changes to their delivery profile or operations.)⁴⁹

The schools then follow the same process for registration with the TAC as other Western Australian organisations applying to be an RTO. If approved, they will be subject to audits by the TAC to ensure they continue to meet the *Standards for Registered Training Organisations (2015)*.

The TAC included nine RTO schools in its 2014 audit of 31 RTOs delivering VETiS, and found that they demonstrated the highest level of compliance (along with outsourced delivery).

But the audit process has been described by RTO school principals as ‘onerous’ and ‘arduous’, requiring weeks of preparation.⁵⁰ One principal called for more support from the DoE and the School Curriculum and Standards Authority (SCSA) to assist schools to gain and maintain RTO status. The principal felt that more schools would consider becoming RTO schools if the quality assurance mechanism for registering, re-registering and monitoring was ‘less inquisitorial and bureaucratic’.⁵¹

There is industry support for more schools to become RTO schools if they can be appropriately resourced, according to the State Training Board.⁵² One submission notes that the state with the highest proportion of schools that are RTOs (Queensland) is also the state where there is a high level of training and support provided by a national VET professional development group.⁵³

The DoE says that it supports RTO schools with the legal processes to become RTOs, but concedes that these could be ‘systemised to reduce the administrative and process

48 Submission No. 14 from Dr Tim McDonald, Catholic Education Western Australia, 7 August 2017, p1.

49 Department of Education website, *VET in Schools – Policies and Planning – Processes for a Registered Training Organisation School*, 18 May 2017. Available at: www.detwa.edu.au. Accessed on 29 September 2017.

50 Submission No. 8 from Ms Leanne Prior, Associate Principal, Mount Barker Community College, 7 August 2017, p2; Submission No.7, closed submission.

51 Submission No. 7, closed submission.

52 Submission No. 13 from Mr Jim Walker, State Training Board and Industry Training Council network, 7 August 2017, p13.

53 Submission No. 23 from Mr Mike Frost, 21 August 2017, pp8-9.

Chapter 2

burden on schools'.⁵⁴ The department says it is exploring a range of options to assist RTO schools to develop supporting documentation, refine processes and practices, and maintain their registration. Issues related to auditing will be explored further in a later section of this chapter.

It is easy to see why schools choose to partner with an RTO in preference to taking on the responsibility of registering to become and remain an RTO. But entering into auspicing arrangements with RTOs also presents risks.

Partnering with private training organisations is cheaper but can be complex and risky

In 2016, 183 RTOs delivered VET courses to year 11 and 12 students in WA.⁵⁵ According to the DTWD, more than 40 were auspicing with schools, but TAC notes that just one was responsible for delivering more than half of VET to schools in an auspicing arrangement.⁵⁶ In 2016 the largest private provider overall had 8511 students enrolled in at least one unit (with some enrolled in more than one unit) and offered 28 qualifications. The second largest in terms of student numbers was the largest in terms of qualifications offered (76) and the number of schools it delivered to.

While some RTOs provide training for thousands of students across dozens of schools, others deliver training to just a handful of secondary students, or even just one (see Table 2.2). RTOs delivering the most VET to schools are presented in Table 2.1, but note that this is overall delivery and not just delivery in an auspice arrangement.

there is one specific provider with a stranglehold on sports qualifications and if they go under it will be a disaster for schools

- ASPA/WASSEA submission

While RTOs are monitored and audited by either the TAC or the Australian Skills Quality Authority (ASQA),⁵⁷ there have been some high-profile instances of private RTO failure in the past few years. The RTO may have gone into liquidation, as was the case with Careers Australia earlier this year, or may have had its registration cancelled by TAC/ASQA for delivering a course it was not registered to deliver or failing to meet compliance standards.

54 Ms Sharyn O'Neill, Director General, Department of Education, Letter, 13 October 2017, p2.

55 Ms Stephanie Trestrail, Training Accreditation Council, Letter, 23 October 2017.

56 Ms Anne Driscoll, Department of Training and Workforce Development Letter, 16 October 2017; Ms Stephanie Trestrail, Training Accreditation Council, Letter, 23 October 2017.

57 The Training Accreditation Council registers and regulates RTOs that only deliver training in WA and the Australian Skills Quality Authority registers and regulates RTOs with a national presence that deliver training in WA and other jurisdictions.

Following the collapse of national provider Careers Australia, which was delivering training to around 400 VETiS students in WA, schools had to find new providers part-way through the course. Schools that had not retained copies of student work also had problems retrieving the schoolwork from the RTO.⁵⁸

Table 2.1: The 10 registered training organisations delivering the most VET units of competency to secondary students in 2016⁵⁹

Registered training organisation provider name		No. of students	No. of qualifications offered
1	Australian YMCA Institute of Education and Training	8511	28
2	VETiS Consulting Services Pty Ltd	7607	76
3	North Metropolitan TAFE	3727	59
4	South Metropolitan TAFE	2829	44
5	Skills Strategies International Pty Ltd	1961	27
6	South Regional TAFE	1479	82
7	Hospitality Group Training (WA) Inc	1254	7
8	Central Regional TAFE	1041	65
9	Australian Institute of Commerce and Technology	1032	7
10	Australian Centre for Advanced Studies Inc	786	14

Note – RTOs shaded in grey are state training providers, all others are private providers.

Source: School Curriculum and Standards Authority, Statistical Reports, Table 5.6 - Number of students who completed at least one VET unit of competency at a Registered Training Organisation, 2016, and Table 5.14 – Registered Training Organisation VET offering Summary, 2016.

Table 2.2: Number of registered training providers providing courses to secondary students, by quantity of students, 2016

9	providers had	over 1000 students
3	providers had	501-1000 students
27	providers had	101-500 students
23	providers had	51-100 students
5	providers had	41-50 students
11	providers had	31-40 students
15	providers had	21-30 students
20	providers had	11-20 students
41	providers had	2-10 students
40	providers had	only 1 student

Source: School Curriculum and Standards Authority, Statistical Reports, Table 5.6 - Number of students who completed at least one VET unit of competency at a Registered Training Organisation, 2016.

58 Submission No. 18 from Mr Mark Paterson, Australian Skills Quality Authority, 11 August 2017, p3.

59 Which RTO is considered the largest provider depends on how it is measured – for example if students are enrolled in more than one course with a provider the student may be counted twice. The figures here are ordered according to the number of students, rather than number of course enrolments.

Chapter 2

And in August 2016, 1400 students were affected when ASQA issued an ‘intent to cancel’ notice to Hands On Computer Training (trading as Australian Institute of Commerce and Technology) when it was found to be providing courses it was not registered to deliver. The cancellation was subsequently set aside by the Administrative Appeals Tribunal, but in the meantime 28 schools had to make alternative arrangements to ensure their students could complete the course.⁶⁰

As the State School Teachers’ Union points out, schools have to go through the process of obtaining the student enrolment with another private provider, meeting the provider’s requirements and regulations, and ensuring that the new RTO is satisfied with teaching staff qualifications and delivery of training packages.⁶¹

ASQA notes the risk associated with a large group of students being enrolled with the same provider. RTO failure not only impacts the students but could also mean that the SCSA is inundated with applications for ‘special consideration’ by students whose WACE achievements have been adversely affected by matters outside of their control.⁶²

Finding 2

The concentration of a large amount of VET in Schools delivery in the hands of a few private registered training organisations puts too many students at risk of course non-completion or disruption in the event that the organisations collapse or are deregistered.

TAC’s Strategic Industry Audit of VET in Schools delivery found that the highest levels of non-compliance were in auspiced courses. Common concerns revolved around:

- training and assessments being changed (by schools) without agreement from the RTO
- inadequate quality assurance by RTOs
- teachers finding it difficult to maintain vocational currency

These concerns have been raised in evidence to this inquiry also. Issues related to teachers maintaining vocational currency were particularly prominent and will be addressed in a separate section.

60 Office of the Auditor General Western Australia, *Vocational Education and Training for Year 11 and 12 Students in Public Schools*, December 2016, p18.

61 Miss Samantha Schofield, State School Teachers’ Union of WA, *Transcript of Evidence*, 6 September 2017, p5.

62 Submission No. 18 from Mr Mark Paterson, Australian Skills Quality Authority, 11 August 2017, p2.

Complaints within auspicing relationships are a two-way street – schools complain about RTOs and RTOs complain about schools.

Schools complained about the convoluted and lengthy process to have modifications to teaching resources approved by the RTO, which deterred teachers from improving and updating resources.⁶³ Perhaps not surprisingly, RTOs complained about teachers modifying and substituting training materials, resources and assessment tools without approval.⁶⁴

However, one RTO said this could be the result of a lack of monitoring by the RTO, or the RTO failing to provide compliant assessments which the teacher saw as requiring improvement. Teachers also may not understand the compliance requirements.⁶⁵

These relationships can be quite challenging as it takes time for RTOs to truly understand school standards and requirements and likewise schools not truly understanding the standards that RTOs must maintain.

- Association of Independent Schools
WA submission

Another RTO noted that RTOs auspicing schools had no authority over the teachers, other than threatening to withdraw their services.⁶⁶

Organisations representing principals and school executives said that interpreting and signing off on increasingly complex contracts and purchasing arrangements was stressful for staff.⁶⁷

The Auditor General found that schools had entered into a wide range of contracts produced by RTOs, such as memoranda, purchase orders and letters of offer. Schools were not always aware that they were in binding commercial arrangements. The fact that individual schools were subject to inconsistent contracting arrangements without oversight or coordination by DoE was a risk that needed to be addressed, according to the Auditor General.⁶⁸

The DoE has committed to improving schools' procurement practices and to implementing 'external RTOs procedures' as part of its duty of care policy.

63 Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals' Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p4.

64 Submission No. 18 from Mr Mark Paterson, Australian Skills Quality Authority, 11 August 2017, p2; Training Accreditation Council, *2014 Strategic Industry Audit of delivery of VET in Schools in Western Australia*, p31.

65 Submission No. 21 from Ms Bronwyn Blencowe, VETis Consulting Services, 11 August 2017, p6.

66 Submission No. 9 from Ms Sandra Robinson, Skills Strategies International, 7 August 2017, p2.

67 Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals' Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p10.

68 Office of the Auditor General Western Australia, *Vocational Education and Training for Year 11 and 12 Students in Public Schools*, December 2016, p21.

Chapter 2

At least one RTO says that it provides a due diligence checklist to partner schools and says that schools should be trained in how to conduct due diligence on the RTO they wish to use.⁶⁹

The DoE (in collaboration with DTWD and schools) is apparently developing support resources for schools entering into partnerships with RTOs, such as selection criteria

and a preferred provider panel, available for use in 2019.⁷⁰

... the majority of our schools operate under the auspice system. They deliver the course themselves in the school environment and the external provider basically has a checklist and says, 'Yes. You've met this particular qualification. You've gone through this particular activity. This is what the activity was supposed to look like. Show me the work samples of the students.' They basically have a rubber stamp that says the teacher has delivered that correctly. It is up to the teacher to deliver it within the class setting environment.

- Samantha Schofield,
State School Teachers' Union

This is in response to a recommendation in the review conducted by Nous Group, which noted that schools seek out RTOs to auspice or deliver their VET activity on an individual basis, resulting in inconsistent quality between schools. Schools did not have the resources to review and compare a large number of providers. A panel of RTOs pre-approved to auspice or deliver VET courses would help ensure an equivalent level of quality of VET across WA and reduce the administrative burden on schools in contracting providers.⁷¹ However, the Committee notes that the panel would need to be extensive enough to prevent a small number of providers from delivering to a large number of students, which presents a risk in the circumstances that an RTO collapses or is deregistered.

Support in selecting training providers is critical if auspicings continues to be the preferred delivery model. With the large number and variety of RTOs involved in VETiS, it is not surprising to find that schools have had variable experiences, from 'excellent' to 'very average'.⁷²

As one submission noted, some RTOs are better than others at providing up to date resources and building and maintaining open lines of communication.⁷³

69 Submission No. 21 from Ms Bronwyn Blencowe, VETiS Consulting Services, 11 August 2017, p8.

70 Submission No. 15 from Ms Sharyn O'Neill, Department of Education, 7 August 2017, Attachment 8.

71 Nous Group, *Review of VET in WA public schools*, commissioned by Western Australian Department of Education, 28 June 2016, pp27-28.

72 Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals' Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p11.

73 Submission No. 7, closed submission.

Schools have complained that RTOs make unreasonable demands of them, such as requiring all student work to be sent to them. One school said that if the school wanted to keep copies of the work 'it would take us hours and hours to copy'.⁷⁴ However, schools may need to provide student work to RTOs so they can moderate results accurately. The Auditor General was told of a case in which an RTO conducted moderation of assessment results by phone without direct contact with student work, which it found concerning.⁷⁵

Recommendation 2

The Department of Education must ensure that it maintains up-to-date guidelines and support materials to help schools navigate and manage the complexities of auspiced delivery arrangements with registered training organisations.

Schools cannot be guaranteed their training provider will not fail

There have been suggestions from some in the VET sector that monitoring of RTOs is inadequate.⁷⁶ RTOs are audited when they apply for registration and again within two years of the initial registration. This used to be within 12 months. Registration is granted for up to seven years (until recently this was up to five years), but even when applying for renewal of registration after this period, RTOs are not necessarily audited. Rather, RTOs are only audited if risk indicators identify a need.

Both ASQA and TAC have adopted a risk-based regulatory approach designed to focus on higher risk providers and minimise the burden on RTOs that consistently demonstrate compliance.⁷⁷

RTOs must comply with mandatory annual reporting requirements that provide evidence that the RTO:

- currently meets the requirements of the *Standards for RTOs* across all of its scope of registration (or has acted to/plans to address the non-compliance)
- has met the requirements of the *Standards for RTOs* for all Australian Qualifications Framework (AQF) certification documentation issued in the last financial year.

74 Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals' Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p9.

75 Office of the Auditor General Western Australia, *Vocational Education and Training for Year 11 and 12 Students in Public Schools*, December 2016, p18.

76 For example: Submission No. 11 from Ms Corinne Brown, trainer/assessor, 7 August 2017; Submission No. 6 from Mr Wayne Wilson, MPA Skills, 4 August 2017; Submission No. 14 from Dr Tim McDonald, Catholic Education Western Australia, 7 August 2017.

77 Submission No. 18 from Mr Mark Paterson, Australian Skills Quality Authority, 11 August 2017, p2; Training Accreditation Council Western Australia, *Annual Report 2015–2016*, p32.

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Assessing provider risk involves compiling a provider profile (containing information about a provider's compliance history, including complaints), using other established predictive risk indicators, and taking into consideration information reported by internal or external stakeholders.⁷⁸

Regulatory responses applied to risky RTOs are proportionate to the risk identified, but can include audits, investigations and suspension or cancellation of registration.

ASQA undertakes an annual 'environmental scan' to identify systemic risks, which are risks likely to exist across the sector or in a portion of providers.⁷⁹ Systemic risks applicable to VETiS have been identified as:

- amount of training
- capability of trainers and assessors
- online delivery and assessment

The equivalent systemic risk assessment for TAC is a Strategic Industry Audit (SIA). TAC's SIA of VETiS in 2014 found varying levels of compliance. In response, additional audits of RTOs with higher levels of non-compliance were conducted within 12 months, and RTOs demonstrating continual non-compliance were subject to ongoing monitoring.

TAC has identified VETiS as an area of continuing concern and says it will undertake further analysis of the issues linked to VETiS arrangements and compliance during 2017–2018.⁸⁰

The Office of the Auditor General audited TAC's regulation of RTOs in 2015. It was concerned that more than half of the RTOs monitored by TAC were found to be non-

BOX 2: Regulation bodies

ASQA, the national regulation body, is responsible for regulating 214 national RTOs operating in WA (and any RTOs not based in WA but delivering VET in WA); and the TAC regulates the 243 RTOs based in WA. More than one-third of these deliver VETiS courses to schools, with ASQA regulating around 66 per cent of these and TAC 34 per cent.

Source: Training Accreditation Council, Letter, 23 October 2017

78 Australian Skills Quality Authority, *Annual Report 2015–2016*, p37; Training Accreditation Council Western Australia, *Annual Report 2015–2016*, p32.

79 Australian Skills Quality Authority, *Annual Report 2015–2016*, p37.

80 Submission No. 10 from Mr Ian Hill, Training Accreditation Council, 7 August 2017, p3.

compliant, with potentially serious consequences for students (who were not necessarily notified of the non-compliance).⁸¹

In 2015–16, of the 50 audits TAC conducted as a result of identified risks, 12 were RTOs delivering to schools. Following the 20-day rectification period, during which RTOs can rectify items or areas of non-compliance, 6 of the 12 were still non-compliant. But in 2016–17, the compliance rate was better: of the 22 audits conducted, 7 were for RTOs delivering to schools and all were compliant following the 20-day rectification period.⁸²

ASQA says that the majority of providers it regulates achieve compliance following the rectification period. ASQA figures show that in 2015–16, only around 18 per cent of providers (nationally) were compliant at the time of audit, but 71 per cent were compliant following the rectification period.⁸³

ASQA and TAC have a close working relationship, sharing information as required. And while they are bound by the same regulations and have much the same approach to monitoring and auditing, TAC says that there are three key differences. These relate to the consideration of state-based risks, follow-up auditing to demonstrate that compliant systems have been implemented, and the provision of a supportive education program.

TAC says that ASQA only undertakes strategic reviews of national issues, and, since there are differing approaches to delivering VET to school students across states and territories, ASQA has not made auditing of VET in Schools delivery a priority.

TAC says that unlike ASQA, it routinely considers the delivery of VET to school students as a risk factor when undertaking a risk assessment of an RTO. It also monitors RTOs to ensure that they have implemented revisions to achieve compliance following an audit (usually with an audit within 6 to 12 months), whereas ASQA may not check the revisions until the next re-registration audit, creating a lag of up to seven years before issues are identified.⁸⁴

It seems that RTOs regulated by TAC are subject to more stringent monitoring processes than those regulated by ASQA, which has only been operating since 2011 and manages thousands of RTOs across the country. Schools might be wise to consider this when deciding which RTO to engage with.

81 Office of the Auditor General Western Australia, *Regulation of Training Organisations*, June 2015, p6.

82 Ms Stephanie Trestrail, Training Accreditation Council, Letter, 23 October 2017.

83 Australian Skills Quality Authority, *Annual Report 2015–2016*, p26.

84 Ms Stephanie Trestrail, Training Accreditation Council, Letter, 23 October 2017.

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Interestingly, following the TAC's strategic audit of VETiS in 2014, which ASQA was not involved with, one of the largest providers of VETiS transferred its registration from TAC to ASQA.⁸⁵

The two largest private providers to schools in WA are both registered with ASQA. Both currently have a condition upon their registration, related to storage of student assessments and records. They can have the decision reconsidered by ASQA if they provide new evidence.⁸⁶

The fact that both regulators have shifted their focus to target providers of concern is no doubt a relief to the RTOs that are compliant and would rather not be subject to unnecessary site audits. These typically take two days and, TAC acknowledges, are resource intensive for the RTO.⁸⁷

While RTOs must complete an annual declaration on compliance and ensure that they systematically monitor and evaluate training and assessment strategies and practices to ensure ongoing compliance with the *Standards for RTOs*, there is no self-auditing mechanism for RTOs, other than when applying to be an RTO.

The Committee suggested to TAC that a self-auditing mechanism, along the same lines as quality assurance checklists used in the building industry, might be useful for RTOs and for the regulators.

But TAC says that the size and scope of the organisations are variable and there is no 'right way' for an RTO to conduct its operations – it just needs to present evidence that it complies with the *Standards for RTOs*.

Even the users' guide to the *Standards for RTOs*

does not prescribe how an RTO should be managed or what evidence must be retained to demonstrate compliance. RTOs are best placed to decide the most suitable way for their organisation to be structured and managed.

While RTOs may be more satisfied with less auditing activity, others in the sector are concerned that the approach is reactive rather than proactive.⁸⁸ However, being proactive would require a lot more resources.

85 Ms Stephanie Trestrail, Training Accreditation Council, Letter, 23 October 2017.

86 As reported on training.gov.au, the national register on VET in Australia, managed by the Commonwealth Department of Education and Training.

87 Ms Stephanie Trestrail, Training Accreditation Council, Letter, 23 October 2017.

88 Submission No. 14 from Dr Tim McDonald, Catholic Education Western Australia, 7 August 2017, p4; Submission No. 6 from Mr Wayne Wilson, MPA Skills, 4 August 2017, p2.

Do schools and parents of VET students have reason to feel assured that students will not be left high and dry by an RTO?

While the incidence of RTO failure is small, the impact is great:

While these incidents are not common they are nevertheless devastating for those involved and schools have little control over the cause or outcomes.⁸⁹

As ASQA notes in its 2015-16 annual report:

the overwhelming majority of training providers that ASQA examined this year were found to be compliant with the requirements of the VET Quality Framework ... However, once again we have seen the actions of the very small number of non-compliant providers tarnishing the reputation of the sector.⁹⁰

While ASQA responded comprehensively to complaints about RTOs approved to offer courses under the Australian Government's VET FEE-HELP program, there does not seem to have been an equivalent response to failures in delivery to school students. Regulation seems to have eased if anything, with longer registration periods and a post-initial audit within two years rather than one year of registration (as is the case with TAC now as well). Annual compliance reporting may or may not detect issues before they become serious, and regulatory decisions made in response to non-compliance may be too late if the RTO is allowed to continue business as usual.

It is difficult to feel reassured that the incidents of RTO failure outlined earlier will not be repeated. The fact that TAC has undertaken to conduct further analysis of issues linked to VETiS is somewhat reassuring, but considering it is responsible for only 34 per cent of RTOs delivering VET in schools, its impact may be limited.

Finding 3

Training provider failure still poses a risk to schools, students and parents, given the long auditing intervals and the fact that only a third of registered training providers delivering courses to school students are under the more watchful eye of the state-based regulator.

Lack of specialised facilities affects the courses schools can offer

Schools which choose to deliver VETiS at school rather than off-site (which is the majority) can only offer courses that they have the facilities and equipment to deliver

89 Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals' Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p10.

90 Australian Skills Quality Authority *Annual Report 2015–2016*, p1.

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to industry standard. A school must show that its equipment meets current industry standards (which in some industry areas is constantly changing) before an RTO will agree to auspice delivery of the course.

Many courses require facilities that simulate the work environment and this is expensive to set up and maintain:

Hospitality is an area that more schools would like to deliver as they have a strong interest from their students. However, often the school cannot meet the resource requirements to meet industry standards.⁹¹

Schools that have been provided with Trade Training Centres (TTCs) or Trades Skills Centres (TSCs) (see Box 3) as part of the Commonwealth Government funded program initiated in 2008 are able to offer trade courses that require specialised or heavy machinery, such as automotive and metals and engineering qualifications.

But even then the schools are responsible for ongoing maintenance costs, machinery replacement and consumables, which could restrict what is offered if schools are unable to afford these expenses.

Several organisations have noted that the high cost of delivering many VET courses is one of the main reasons the business and sport and recreation qualifications are the most commonly delivered: it is not necessarily about student demand, but about what is cheap and easy to deliver.⁹²

BOX 3: Trade Training Centres and Trades Skills Centres

The Trade Training Centres in Schools program was established by the Commonwealth Government in 2008 as 10-year scheme to provide eligible secondary schools with industry training centres. The centres house workshops and industrial/commercial equipment and facilities, giving students access to trade-related vocational education and training and helping build partnerships with local businesses and industry. Schools were funded based on need and the quality of their applications, which were made either individually or in collaboration with neighbouring schools. With the change of (Commonwealth) government in 2013, funding continued only for centres already approved and they were rebranded as Trades Skills Centres.

In WA, 35 Trade Training Centres and 5 Trades Skills Centres have been established in public schools. More than half of these (26) are in regional WA. There are also centres at some Catholic and independent schools. In some cases, school clusters have been formed by schools from different sectors. For example, the Bunbury Regional Trade Training Centre is a consortium of 15 schools and has centres at Manea Senior College and Eaton Community College (both public schools) and Bunbury Catholic College.

91 Submission No. 22 from Mr Wade McLeod, Association of Independent Schools WA, 16 August 2017, p5.

92 Miss Samantha Schofield, State School Teachers' Union of WA, *Transcript of Evidence*, 6 September 2017, p2; Mrs Mary Griffiths Principal, Armadale Senior High School, *Transcript of Evidence*, 6 September 2017, p14; Submission No. 22 from Mr Wade McLeod, Association of Independent Schools WA, 16 August 2017, p5.

These, along with courses such as information technology and digital media, can be delivered in larger class sizes and usually without specialised resources.⁹³ One principal noted that the on-site availability and access to the Certificate II in Business was one reason why such a large group of students at the school chose it, but only a third said that they planned to go on to TAFE to study a more advanced business certificate after finishing school.⁹⁴

Table 2.3: Five industry areas with the most VETiS course enrolments, 2016

Industry areas (based on ANZSIC)*	No. of CEs	% of total CEs
Arts and Recreation Services	14,189	29.2%
Administrative and Support Services	9,474	19.5%
Information Media and Telecommunications	4,038	8.3%
Manufacturing	3,957	8.1%
Accommodation and Food Services	3,829	7.9%

*Australian and New Zealand Standard Industrial Classification, developed by the Australian Bureau of Statistics and Statistics New Zealand for use in compiling and analysing industry statistics. Qualifications are mapped to WA ANZSIC industry areas at the state level in consultation with stakeholders.

CEs = course enrolments

Table 2.4: VETiS qualifications with the most course enrolments, 2016

Qualification	No. of CEs	% of total CEs
Certificate II in Business	5,471	11.3%
Certificate II in Sport and Recreation	4,670	9.6%
Certificate II in Hospitality	2,422	5.0%
Certificate II in Information, Digital Media and Technology	2,339	4.8%
Certificate II in Visual Arts	2,090	4.3%
Certificate II in Outdoor Recreation	1,937	4.0%
Certificate III in Business	1,809	3.7%
Certificate II in Engineering Pathways	1,671	3.4%
Certificate II in Sport Coaching	1,381	2.8%
Certificate II in Community Services	1,298	2.7%
Certificate II in Building and Construction (Pathway - Trades)	1,202	2.5%

CEs = course enrolments

Source: Department of Training and Workforce Development, VET in Schools Activity in 2016, Attachment to letter, 16 October 2017, pp 7, 25.

The ability of a school to collect fees for VET courses also affects what is delivered. Schools will often charge students a fee of up to several hundred dollars to offset the

93 Submission No. 20 from Miss Samantha Schofield, State School Teachers' Union of WA, 9 August 2017, p6.

94 Submission No. 7, closed submission.

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full cost of a VET course (while resource charges for non-VET courses are usually under one hundred dollars), but not all parents can afford to pay:

As a government school offering year 11 and year 12 courses we can set fees and charges that reflect the resourcing requirements of a particular course, however, the guarantee that parents and students can pay their school fees is never certain ... There is often a higher charge associated with VETiS because of the resources and equipment used in the course; however, it is rare that we would receive full fee payment for the vast majority of our VETiS courses.⁹⁵

As one contributor to the ASPA/WASSEEA submission said:

If resourcing only allows schools to pick the easiest and cheapest qualifications to deliver (for example Business) then the students will not have the breadth of choice and (that) defeats the purpose and the spirit of VET in Schools.

While it is economically implausible for every school to be equipped to provide every conceivable VET qualification, it is also unfair that students are restricted in what they can study by virtue of which school they attend.

One way to address this is more collaboration between schools, whereby schools develop the training facilities to deliver particular qualifications and allow students from other schools to use them, while at the same time allowing their own students to attend other schools to complete courses they do not offer.

Although there are some instances of collaboration - particularly involving students using TTCs and TSCs at other schools - in the main schools are not sharing course offerings and combining their teaching and learning resources.⁹⁶

Collaboration is a central tenet of *Preparing Secondary Students for Work*, the framework for vocational learning and VET developed by the Education Council.⁹⁷ It says:

⁹⁵ Submission No. 7, closed submission.

⁹⁶ Submission No. 13 from Mr Jim Walker, State Training Board and Industry Training Council network, 7 August 2017, p13; Nous Group, *Review of VET in WA public schools*, commissioned by Western Australian Department of Education, 28 June 2016, p36.

⁹⁷ The Education Council is a COAG council whose members include state, territory, Australian Government and New Zealand Ministers with portfolio responsibility for school education, early childhood and/or higher education. It provides a national forum for sharing information and resources on issues of national significance.

Collaboration with other schools, RTOs and/or employers can increase access to physical infrastructure, skilled people and other resources that may not be available otherwise. Such arrangements can offer students a greater choice of VET courses and exposure to a wider range of training settings.

Increased collaboration was also a recommendation of the Nous Group's review, which noted that collaboration was common in other Australian states. It also suggested investigating the possibility of non-government and government schools collaborating.

Schools cite logistical problems with collaboration, such as coordinating timetables, but the Education Council says that schools should collaborate on practical issues such as timetabling and flexible delivery.

The DoE says that work has commenced on exploring collaborative approaches to VET delivery and it has identified examples of collaborative VET delivery in other states that merit further investigation. It is also documenting examples of good VET collaborative practice in WA.⁹⁸

Finding 4

The range of VET courses students can study at school is limited by the lack of access to specialist facilities.

Recommendation 3

The Department of Education must ensure its investigation of collaborative models results in practical ways for schools to expand their VET offerings and increases equity of access.

TAFE colleges should play a bigger role in VET in Schools delivery

While some in the education and industry sectors would like to see TAFE play a bigger role in delivering VETiS, it is currently a more expensive option for auspicings, which is one of the reasons most schools auspice with a private RTO.

The DTWD says that RTOs with lower overheads – and offering qualifications that do not require extensive infrastructure and resource requirements – are able to set their fees at competitive prices to attract potential students.

In 2016, TAFE charged, on average, around \$72 per school student for auspicings, while at least one RTO was charging only \$50 per student for a business qualification.⁹⁹

⁹⁸ Ms Sharyn O'Neill, Department of Education, Letter, 13 October 2017.

⁹⁹ Ms Anne Driscoll, Department of Training and Workforce Development, Letter, 16 October 2017.

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TAFE uses a fee model indexed to the Consumer Price Index (CPI) which the DTWD says does not account for increased regulatory compliance costs, wage costs and other costs that had increased ‘by significantly more’ than the CPI.

Regulatory changes had increased the workload to quality assure training delivery and assessment conducted by teachers under auspicings agreements. TAFE colleges only recouped an estimated 26 per cent of the costs involved in auspicings to public schools in 2015.

TAFE colleges have been reining in their auspicings services and only partnering with schools where they have an established relationship. While some schools have found this frustrating and puzzling, one notes that RTOs may be reluctant to auspice with schools because they are seen as a risk to their RTO status and ability to meet external TAC/ASQA audit requirements.¹⁰⁰

The DTWD maintains that quality assurance is something TAFE takes seriously, since without it a TAFE college's registration and reputation is seen as being at risk.¹⁰¹

We need a strong, reliable, consultative and collaborative TAFE system that meets the needs of all stakeholders i.e. schools, students and industry. TAFE should provide flexible/alternative delivery

- ASPA/WASSE
submission

At present, TAFE accounts for only 20 per cent of auspicings delivery, but it delivers VETiS in other ways – mainly through DTWD-funded profile hours, and by delivering the classroom component of apprenticeships and traineeships (although around half of this is delivered by private RTOs).

In 2016, there were 12,245 course enrolments for VETiS at TAFE colleges, 5 per cent less than in 2015. DTWD-funded VETiS course enrolments accounted for 56 per cent of this, which was an 11 per cent increase on 2015.

Non-DTWD-funded course enrolments at TAFE colleges decreased by 20 per cent. That is, there were fewer schools or individual students prepared to pay full TAFE course fees.

DTWD provided TAFE colleges with funding of around \$25.9 million with \$19.9 million allocated to profile hours, \$3.1 million for pre-apprenticeships in schools, \$1.8 million for SBAs and SBTs and \$1.1 million for the Aboriginal school-based training program.

While TAFE could become more involved in auspicings, increasing the number of profile hours provided by DTWD is also seen as a key way for students to access courses delivered by TAFE.

100 Submission No. 7, closed submission.

101 Ms Anne Driscoll, Department of Training and Workforce Development, Letter, 16 October 2017.

DTWD says it is planning to trial a process to establish ‘compacts’ between public schools and TAFE that utilise the VET funding provided to schools and local TAFE capacity to expand profile-funded places.¹⁰² The department did not provide detail of how this would work in practice, but any changes that can deliver the outcomes many students, parents and schools are seeking are welcome. At present, competition for profile places is very tight, with many students missing out and either having to change their course plans or find the funds to pay the full fee.¹⁰³

In 2016, a student wishing to enrol in a Certificate II in Information, Digital Media and Technology – a common qualification for secondary students – at North Metropolitan TAFE would have to pay \$2200. In 2016, only 72 year 11 and 12 students (0.8% of TAFE VETiS students) took up the fee-for-service option at TAFE. It is unknown if the student or school paid the fees.

Two arguments often put forward in support of TAFE delivery are:

1. Its status as a public sector body, which means students are protected from private RTO failure
2. Its close connection with industry

As the SSTUWA pointed out, there are multiple TAFE campuses across the state which students can access (in the event that the student moved schools or a campus closed, for example), but if a private provider collapses or the student moves schools the student needs to enrol with a new provider, which is disruptive.

There was a sense that as a long-established state provider, TAFE colleges already had governance and management structures in place.¹⁰⁴ Regulations and auditing processes for TAFE colleges were described as ‘highly stringent’,¹⁰⁵ which could give schools and parents confidence that the RTO was delivering to the standard required.

Construction Training Council skills development director Alan Davis said that TAFE colleges were well connected with industry, which meant they could easily find work experience placements for students. Lecturers were also from industry backgrounds which gave employers confidence in TAFE-trained students.

102 Ms Anne Driscoll, Department of Training and Workforce Development, Letter, 16 October 2017.

103 Submission No. 4 from Mr John Willett, Ertech Holdings, 2 August 2017, p1; Submission No. 7, closed submission; Submission No. 14 from Dr Tim McDonald, Catholic Education Western Australia, 7 August 2017, p4; Submission No. 6 from Mr Wayne Wilson, MPA Skills, 4 August 2017, p2.

104 Mr Domenic Camera, Principal, Australind Senior High School, *Transcript of Evidence*, 6 September 2017, p7.

105 Miss Samantha Schofield, State School Teachers’ Union of WA, *Transcript of Evidence*, 6 September 2017, p4.

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But one principal noted that having a useful partnership with TAFE depended on what courses the TAFE had available:

Making TAFE the required first port of call for schools would be problematic in some regions because they don't always work with schools to understand student and course context or need. This is why some schools choose to use the private sector as RTOs for SBTs as they can be more flexible.

A contributor to the ASPA/WASSEA submission described TAFE offerings as 'erratic, late in notification, subject to change and variable in quality' and another noted that the standard of training could vary not just between TAFE colleges but also within them. Another submission complained that TAFE teachers lacked industry experience and that students had had training cancelled without sufficient warning.¹⁰⁶

There were also logistical problems with sending students off-site, such as ensuring that all students undertaking courses at TAFE would be able to do so on the same day, so as not to interfere with attendance for school-based units on other days:

you cannot easily run a timetable with everything else on a four-day timetable ... it becomes organisationally really challenging to have it across the board. Sure, if you had the TAFE on-site, it would be brilliant, but that is just not practical.

Another principal noted that as an adult learning environment, TAFE was not necessarily suitable for all secondary students. Some students needed the structure and direction that a schoolteacher could provide. (This is explored more in the next section.)

Timetabling and teacher suitability issues may deter some schools from using TAFE for off-site delivery, but in an auspicing arrangement for on-site delivery, school teachers deliver the training.

Despite some negative comments about TAFE in its submission, the ASPA and WASSEA concluded that TAFE must auspice and either be given the capacity to charge appropriately or funded in order to subsidise delivery.

The WA Council of State School Organisations also supported TAFE auspicing, but did not propose that it be the sole provider:

the response to issues with VET is often to say that private (not for profit and for profit) providers should all be shut down and TAFE should be the sole provider. This suggestion assumes all problems would be solved by

106 Submission No. 5 from Ms Louise Kingston, Access Engineering, 4 August 2017, p1.

shutting down the non-TAFE providers. However, private providers nationally deliver around 3 million of the 4.5 million VET enrolments annually and student and industry satisfaction is well above 80% year in-year out ... it is clear that diversity in the system is actually of benefit and helps to meet the needs of students participating in the VETiS program.

A private training provider noted that it was frustrating that only state training providers had access to the profile funding provided by DTWD. This particular RTO has collaborated with another training provider (Ertech Construction Academy) to deliver the Certificate II in Civil Construction to VETiS students, with a particular focus on Indigenous and disengaged students.¹⁰⁷

Ertech used to partner with South Metropolitan TAFE but, according to its submission, ended the contract after discussions related to the company's ability to continue to underwrite the program, which is expensive to deliver. Under that arrangement, students were able to enrol in the course at no cost to them if they were recipients of profile funding, but as of this year course has been delivered on a fee-for-service basis and enrolments have decreased by 50 per cent.¹⁰⁸

It is up to the individual school to determine whether to use its DoE-provided VETiS funding to pay for fee-for-service courses on behalf of students. If they do not or cannot, the cost is borne by parents.

Ertech Construction Academy notes that there are other programs in the civil construction industry that could be offered to secondary students, but the TAFE sector 'is not always willing to add courses to their scope'.¹⁰⁹

If, as the public provider, TAFE is only able to provide access to a limited range of courses for a limited number of secondary students, perhaps it is time to revisit the definition of public education. Public secondary school students are entitled to a free education, but in practice this often limits VET students to:

As a privately owned RTO who has to date been unable to access the VETiS program due to entry restrictions, this has been and is extremely frustrating, despite our overwhelming desire to engage with young learners and to upskill the next generation of workforce, which we feel we can do so well.

- Australian Training Management submission

107 Submission No. 3 from Mr Alan Gregory, Australian Training Management Pty Ltd, 2 August 2017, p1.

108 Submission No. 4 from Mr John Willett, Ertech Holdings, 2 August 2017, p1-2.

109 *ibid.*

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- (a) the cheaper vocational courses offered to schools by private RTOs, which schools subscribe to to make their VET funding stretch further; and
- (b) the limited range of (usually) more expensive industry-specific courses that TAFE offers via DTWD's profile funding.

If TAFE were able to auspice a greater proportion of schools, and perhaps if the funding DTWD provided for students to enrol in industry-specific courses could also be taken up by well-equipped private RTOs, there would be a greater chance of students having their needs met.

At present TAFE sits outside the Department of Education, yet it is integral to public education. VET in Schools is now a critical part of secondary education, and the DTWD should not regard TAFE as an ancillary service.

This provision of only industry-supported qualifications by DTWD raises questions about the role and the needs of industry and about the closer integration of the education and training departments, which will be explored further in Chapter Four.

Finding 5

One of the reasons many schools choose to be auspices by private registered training organisations rather than TAFE is because they are cheaper.

Recommendation 4

The Department of Training and Workforce Development should consider amending the fee model used by TAFE for auspicings schools to ensure that TAFE can compete with private registered training organisations offering a similar service.

Finding 6

Many students miss out on obtaining fully funded places in industry-supported qualifications at TAFE, and are unable to afford the high course fees.

Recommendation 5

The Department of Training and Workforce Development should investigate ways to create more capacity for secondary students to study a wider range of fee-free industry-supported qualifications through the state training providers or other suitable registered training providers.

VET teachers with the ideal mix of qualifications are rare

Is it better for a secondary school teacher to acquire the necessary industry knowledge, skills and qualifications to teach VET or is it better to engage someone from a trade background who already has these skills?

The question of who should teach is perhaps a question of what is being taught. Industry will argue that trade-specific courses are best taught by people with a strong trade background. But for generic vocational learning courses that do not use specialised equipment and rely only on classroom-based teaching, industry experience may not be particularly relevant. The ability to understand and connect with teenagers may be more critical.

At present, with auspicing the most common delivery model, most VET is delivered by secondary teachers in classrooms or school facilities. TAFE lecturers or private trainers deliver only about 17 per cent of VET. The remainder is delivered by secondary school teachers, but only 14 per cent currently teach VET courses.

As mentioned previously in this chapter, the business, sports and recreation and arts courses are the most common VET courses in schools. This was attributed to the ease of delivery in terms of physical infrastructure – but one also has to ponder whether the comparative ease of finding teachers for these courses contributes to their popularity. Schools would be much more hard-pressed to find staff to teach some of the industry-specific courses, such as automotive engineering and hospitality.

In many cases the ideal VET teacher for schools is a hybrid of trade professional and teaching professional. But teachers with both a teaching degree and a trade background are a rarity.

According to VETiS consultant Mike Frost, recruiting appropriately qualified staff with industry currency, proper training qualifications and the capability to work with school students is one of the most common threats to the sustainability of VETiS programs.¹¹⁰

As one principal noted:

*School delivery of VETiS is very much limited to the staff who can bring to the table these specific trade and industry skills and qualifications. The random success of senior schools to employ teachers with vocational skills is a risk; there simply are not enough suitable VETiS teachers in the system.*¹¹¹

As a result, teachers often find themselves acquiring VET skills and qualifications at the same time as pursuing their teaching career. The burden associated with this is discussed more fully below.

¹¹⁰ Submission No. 23 from Mr Mike Frost, Mike Frost and Associates, 21 August 2017, p6.

¹¹¹ Submission No. 7, closed submission.

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Trainers in the VET sector (who have a training qualification but are not necessarily registered teachers) often have closer links to industry and as such are considered to be well positioned to deliver training that is current and relevant to industry.

One industry training group (the Construction Training Fund) specified that trade qualifications they were supporting be delivered by a trade qualified person with current industry experience, rather than a schoolteacher.¹¹²

This was at the request of the industries the Construction Training Fund represents.¹¹³ Industry was closely involved in the development of the Certificate II in Building and Construction, which offers a trades pathway and a para-professional pathway, designed for VET in Schools:

*By ensuring that the RTO that is delivering it is either a trade qualified person in school, where they do have some trade qualified teachers, or it has got to be delivered by a TAFE or private provider that has got those qualifications. You build the quality into the delivery, because if you do not get the outcome, when they come out with the qualification, the industry will pick it up straightaway.*¹¹⁴

But their lack of a secondary teaching qualification has raised concerns that they are not best placed to be managing the particular needs of adolescents:

*A big concern for many schools is that some external RTOs have no idea of what working with teenagers involves! The training sector is an 'adult learning environment', but many teenagers are not there yet and need additional support and motivation that needs to be provided by school staff...*¹¹⁵

Another type of VETiS teacher is the tradesperson without any teaching or training qualifications who is permitted to teach in a school for a limited time if he or she meets certain criteria. These temporary teachers may be eminently qualified in terms of their industry skills but the process of having them approved to teach is a deterrent. They are only appointed if a school has been unable to find a suitably qualified teacher for a VET course.

So, in summary, secondary school students are taught VET subjects either by:

112 Mr Alan Davis, Construction Training Council, *Transcript of Evidence*, 6 September 2017, p12.

113 The Construction Training Fund is one of nine industry training councils which provide advice to the government (via the State Training Board) on skills shortages and training needs and priorities. The councils have a role in developing the VET curriculum to ensure that training is aligned with current industry competencies and requirements.

114 Mr Alan Davis, Construction Training Council, *Transcript of Evidence*, 6 September 2017, p12.

115 Submission No. 8 from Ms Leanne Prior, Mount Barker Community College, 7 August 2017, p2.

1. secondary school teachers with a teaching qualification, a Certificate IV in Training and Assessment, a relevant VET qualification and industry experience
2. a trainer/lecturer from a private training organisation who usually does not have a school teaching qualification
3. a lecturer from a state training provider (i.e. a TAFE college) who does not necessarily have a school teaching qualification
4. a person with industry skills who does not have a teaching qualification

To teach in a school, the *Teacher Registration Act 2012* requires teachers/trainers to be registered with the Teacher Registration Board of Western Australia (TRBWA). However, a person who is a trainer and assessor¹¹⁶ delivering VET courses is not required to be registered, even if working in a school.

People in category 4 seeking to teach in a school can only do so if they apply for and are granted limited registration by the TRBWA.

The category of limited registration (formerly known as limited authority to teach or LAT) was created to allow employers to employ suitably qualified people who are not registered teachers to fill specific teaching roles when needed (see Box 4).

You will get both sides of the story which say that because it is a vocational element, it should be delivered under a training package or through those specified teaching staff members there, or lecturers for example. There is the other side which says that anything that is delivered in a school environment should be under the controlled auspices of the teaching staff member. I think that is the conversation to be had and those are the sorts of things that need to be worked out, not only across our sector, but also in the independent and Catholic sector as well, and how we deal with, fundamentally, the principles of how to educate adolescents.

- Samantha Schofield,
State School Teachers' Union

While the process sounds straightforward enough on paper, principals tell a different story:

*we have employed, as a member of our staff, an automotive teacher. Every year we have to reapply that because he actually cannot get permanency at our school because he is not a university-qualified person, but he teaches only practical at our school.*¹¹⁷

¹¹⁶ As defined within the Australian Quality Training Framework or the Commonwealth's Standards for National VET Regulation Registered Training Organisations (2011).

¹¹⁷ Mrs Mary Griffiths, Principal, Armadale Senior High School, *Transcript of Evidence*, 6 September 2017, p11.

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Each year, the principal has to prove that she has tried to get a fully qualified teacher and pay the associated fees to the registration board, when '(she) is quite competent and capable as a principal to judge that he is good enough to do it'. Principals would like to be given the authority to determine whether someone who is not a registered teacher is suitable to teach a course.

BOX 4: Limited registration

Applications for limited registration are made to the Training Registration Board by the employer on behalf of the person who is being offered the teaching position (the nominee).

To approve the registration application, the board must be satisfied that the nominee has expertise skills in a subject relevant to the teaching position. No formal qualifications are required to be submitted, but the application should contain some evidence that the criterion is met.

In most cases the school principal, as the employer's delegate, would provide a reference attesting to the nominee's expertise and skills.

The employer is responsible for paying the initial registration fee of \$220, but once registered, nominees are responsible for the annual registration fee. Limited registration is granted for up to three years.

Source: Limited Registration: Qualification and Skills Policy and TRBWA website.

School teachers delivering VET face an unreasonable workload

There is a great deal of discontent about the extra qualification and work requirements imposed on VET teachers. There was acknowledgement from many that the teaching skills required for VET are different from those provided by a university qualification,¹¹⁸ and hence general acceptance of the requirement to undertake the Certificate IV in Training and Assessment.

This qualification, known as the TAE40110, develops the knowledge and skills to deliver and assess vocational education and training and is a requirement for teachers delivering VET under the *Standards for Registered Training Organisations 2015*.

But the qualification has recently been updated and from 2019 teachers will be required to have the new TAE40116. For those with the existing qualification the upgrade will mean completing an additional two units, which schools will need to fund.

118 Ms Sharyn O'Neill, Department of Education, *Transcript of Evidence*, 13 September 2017, p2; Submission No. 21 from Ms Bronwyn Blencowe, VETiS Consulting Services, 11 August 2017, pp3-4; Mr Ian Johnston, Principal, Greenwood College, *Transcript of Evidence*, 6 September 2017, p10.

According to the WA Secondary School Executives Association, while teachers accepted the need for the Certificate IV they were annoyed by the changes to it and the cost to update it.¹¹⁹

For those without the existing qualification, the course – which is usually tailored specifically for secondary teachers and takes into account their university studies – takes five full days, two days more than the current course.

It has been suggested that education students be offered the opportunity to complete the Certificate IV in Training and Assessment as part of their university studies. Given the increasing demand for secondary teachers to teach VET courses, it seems a reasonable expectation, but finding a way to implement it is proving difficult.

In 2016 Curtin University and TAFE collaborated on a trial offering the Certificate IV at the completion of teaching degree studies (since it was considered too difficult to integrate the course with the degree), but there was no interest from students. Despite this, Curtin continues to monitor the possibility of offering the program some other way within its school of education.¹²⁰

Edith Cowan University acknowledged the ‘growing need’ for this qualification and was investigating ways it might be offered by the university outside the structure of the degree. Like Curtin, it identified issues (related to HECS and Australian Qualification Framework levels) which prevented it from being integrated into the course.¹²¹

Murdoch University had also investigated the possibility of auspicing the Certificate IV for secondary teaching students, but said that it was necessary to have a vocational area of competence to enrol in the course, which most undergraduates did not have.¹²²

The University of Western Australia only offers a Masters program for secondary teaching, and said it was not possible to integrate a Certificate IV at this level; and Notre Dame University said that it was best for schools to offer teachers professional development opportunities to attain the Certificate IV, rather than the university.

If university students are not interested in completing the Certificate IV in Training and Assessment as an addition to their studies, this is quite possibly a result of lack of

119 Mrs Janette Gee, WA Secondary School Executives Association, *Transcript of Evidence*, 6 September, p12.

120 Associate Professor Lina Pelliccione, Head of School of Education, Curtin University, Letter, 6 October 2017.

121 Associate Professor Andy Jones, Associate Dean Secondary Education School of Education, Edith Cowan University, Electronic Mail, 18 October 2017.

122 Dr Lisa Cary, Associate Dean for Learning and Teaching, School of Education, Murdoch University, Electronic Mail, 20 October 2017.

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awareness of the demand for VET teachers in secondary schools and the difficulty of completing further studies once they are teaching.

Universities should be producing graduates with the qualifications they will need, and promoting the worth of the dual qualification in terms of its attractiveness to potential employers. School principals have talked of how conscious they are of the potential for good VET teachers to be poached by other schools, such is their value.¹²³

At present there is no compunction on universities to produce graduates with VET teaching skills, even though Standard 2.2 of the *Western Australian Standards for the Accreditation of Initial Teacher Education Programs (2016)* stipulates that:

Program development, design and delivery take account of:

a) contemporary and emerging developments in education, curriculum requirements, community expectations and local, employer and national system needs including workforce demands for teaching specialisations

It could be argued that current teaching programs do not meet Standard 2.2 of the accreditation standards, in that they are not taking account of emerging developments in VET and workforce demands for specialisations.

The accreditation standards are developed by the Teacher Registration Board of Western Australia (TRBWA)¹²⁴ and approved by the Minister for Education. Institutions must apply to the TRBWA for accreditation of initial teacher education programs and are required to demonstrate that the accreditation standards have been met.¹²⁵

The three-day (soon to be five-day) fast-track program specifically designed for secondary school teachers undertaking the Certificate IV in Training and Assessment is probably the equivalent in hours of one or two university course units. The TRBWA should consider whether a version of the Certificate IV (TAE40116) could be offered as electives in university teaching degrees – or even as core units if the TRBWA deemed it necessary.

The list of training assessment credentials at Schedule 1 of the *Standards for Registered Training Organisations 2015* would need to be amended to include the vocational education units as part of a university teaching qualification.

Including vocational teaching as part of a secondary teaching degree would side step the problem of trying to integrate a certificate course with a degree. VET teachers in

123 WA Secondary School Executives Association, *Transcript of Evidence*, 6 September, p9.

124 The TRBWA is a seven-member board appointed by the Minister for Education.

125 TRBWA website, Initial teacher education programs - Applying for accreditation. Accessed from www.trb.wa.gov.au.

schools would still need to complete a trade qualification in the area in which they intended to teach:

*The general inadequacy of university teacher training programs recognising VETiS needs is commonplace. Only a very few teacher training programs address school-based VET and there is a general belief that this needs to be addressed by universities and probably TAFE colleges into the future.*¹²⁶

Recommendation 6

The Teacher Registration Board of Western Australia consider amending its accreditation standards for initial teacher education programs to include a vocational teaching component for secondary teachers, either as an elective or a core unit.

The Minister for Education and Training could consider this as part of the current statutory review of the *Teacher Registration Act 2012* (WA).

Having to complete the certificate qualification they are teaching has caused resentment among some highly qualified teachers. According to the SSTUWA, in some instances teachers held masters and doctoral degrees in subject specific areas, but were still required to complete a Certificate II in that subject to meet the requirements under the *Standards for RTOs* act.

The union said that while some RTOs had provided guidance to teachers and schools on how to complete a form for recognition of prior learning, others had been 'exceptionally difficult' in providing support or guidance.

Teachers often had to complete the qualification in their own time and pay course fees of up to \$1500.¹²⁷ As one contributor noted, if further education were a requirement in many other industries, the course costs would be covered.¹²⁸

But the view from industry was a little different. The State Training Board said that there were distinct differences between teaching and vocational training. A VET teacher's role as a dual professional needed to be recognised to address resentment at having to complete what teachers considered 'lower-level' qualifications.¹²⁹

126 Submission No. 23 from Mr Mike Frost, Mike Frost and Associates, 21 August 2017, p6.

127 Submission No. 24 from Mr Kim Skoss, VET Coordinator, Manjimup Senior High School, 9 October 2017, p2.

128 Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals' Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p13.

129 Submission No. 13 from Mr Jim Walker, State Training Board and Industry Training Council network, 7 August 2017, p19.

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The requirement to maintain industry currency was also the cause of frustration. RTOs determine how trainers maintain vocational currency, but it usually includes a period of working in the relevant industry each year.

The expectation that this is done in addition to working full-time has meant that schools either have to release teachers and pay for relief teachers to cover their classes, or that teachers work on their holidays and on weekends so as not to disrupt their teaching timetable.

Two examples were provided which demonstrated the nonsensical nature of some of the requirements for maintaining vocational currency.¹³⁰

For maintaining currency for the hospitality certificate, a home economics teacher had to demonstrate every couple of years that she knew how to make a sandwich in 12 different service settings. That meant finding work in, potentially, 12 different work environments.

A cricket coach who had played for Australia and was qualified to coach at state level and above had to 'prove that she can teach a kid how to bowl' to teach a Certificate II in sport and recreation. 'It is not as simple as saying, "Here's my coaching certificate."'

The DoE has recognised that it needs to work closely with industry and employer groups to develop 'more responsive opportunities' for teachers to maintain currency, including considering how to service this need in remote and regional schools.

Perhaps equally useful, however, would be greater guidance on proof of currency in TAC's users' guide for the *Standards for Registered Training Organisations 2015*. At present, 'there is no prescription as to how trainers and assessors must maintain their currency in industry skills', but RTOs 'must ensure that all trainers and assessors undertake professional development in VET, and specifically in competency-based training and assessment'. The standards do not prescribe how often professional development must occur.¹³¹

The lack of prescription is deliberate, in recognition of the fact that RTOs 'are diverse in size, structure, governance and the scope and volume of services provided'. The standards are designed to encourage flexibility and innovation.¹³² While RTOs are obviously obliged to ensure the teachers they are auspicing meet the standards, the

130 Related by Ms Melissa Gillett, Principal, John Forrest Secondary College, *Transcript of Evidence*, 6 September, pp10-11.

131 Training Accreditation Council, *Users' Guide – Standards for Registered Training Organisations 2015*, Perth 2015, p35.

132 *ibid*, p2.

degree of flexibility in how they do this means that they could in fact make it less of an imposition on teachers. Suggestions along these lines in the *Users' Guide: Standards for Registered Training Organisations 2015* produced by TAC would be welcome.

Frequent changes to training packages, which required teachers to update resources and sometimes their certificate qualification, was also a source of frustration.

As one principal said, teachers involved in VETiS programs are 'significantly impacted upon' because they are required to:

- have the VET qualification at or above the level they are delivering and assessing;
- have the Certificate IV in Training and Assessment
- maintain their industry currency
- maintain records and systems different from regular secondary school courses
- meet the expectations of RTOs
- participate in audits if they are in an RTO school.¹³³

It is easy to imagine teachers deciding not to continue to teach the VET courses in schools when they are forced to meet so many requirements widely regarded as unnecessary. Considering only 15 per cent of secondary teachers are currently teaching VET, any practices which might discourage VET teaching in schools should be reviewed.

Finding 7

The extra qualification and vocational currency requirements for VET teachers are exacting a toll on teachers and challenging school resources.

Recommendation 7

The Training Accreditation Council considers amending its *Users Guide: Standards for Registered Training Organisations 2015* to direct registered training organisations to take into account the particular concerns of secondary school VET teachers in regard to maintenance of industry currency requirements.

¹³³ Submission No. 7, closed submission.

Chapter 3

There are challenges particular to delivering VET in regional schools

The proportion of regional students completing VET is similar to metropolitan schools

Many of the issues faced by regional and remote communities in the delivery of VETiS are similar to those in the metropolitan area, only more pronounced. Others – such as low student numbers, lack of transport and limited providers – are more particular to the regions and generally a corollary of geographical isolation.

Students in regional and remote schools are less likely to attempt to gain university entry, with just under a third of students enrolling in ATAR courses, compared to 45 per cent of metropolitan students.¹³⁴ It could therefore be argued that it is more important for students in regional WA to receive a good vocational education.

This is not to say that regional students should not be encouraged to pursue university education and have every opportunity to do so, but the leader of a review into regional, rural and remote education in Australia has suggested that there is too much emphasis on sending rural students to university.

BOX 5: Regional educational disadvantage

The most educationally disadvantaged areas are located in remote and very remote areas throughout the State, with Leinster-Leonora ranked first in the bottom ten, followed by Halls Creek, East Pilbara, Roebuck and Meekatharra.

These communities have high Indigenous populations, averaging 37.3 per cent and ranging from 18.0 per cent in Roebourne through to 78.3 per cent in Halls Creek.

This compares to the most advantaged areas, which are all located in Perth in the immediate areas surrounding the Swan River.

The lack of access to services in many of the disadvantaged areas across Western Australia is evident, with a very high proportion of children living in households that do not have access to the internet – 46.7 per cent on average.

Source: Cassells, R., Dockery, M., Duncan, A., Gao, G. and Seymore, R., 'Educate Fair Australia?: Education Inequality in Australia', Bankwest Curtin Economics Centre, Focus on the States Series, Issue No. 5, June 2017.

134 Department of Education, *Annual Report 2015–2016*, Western Australia, p31.

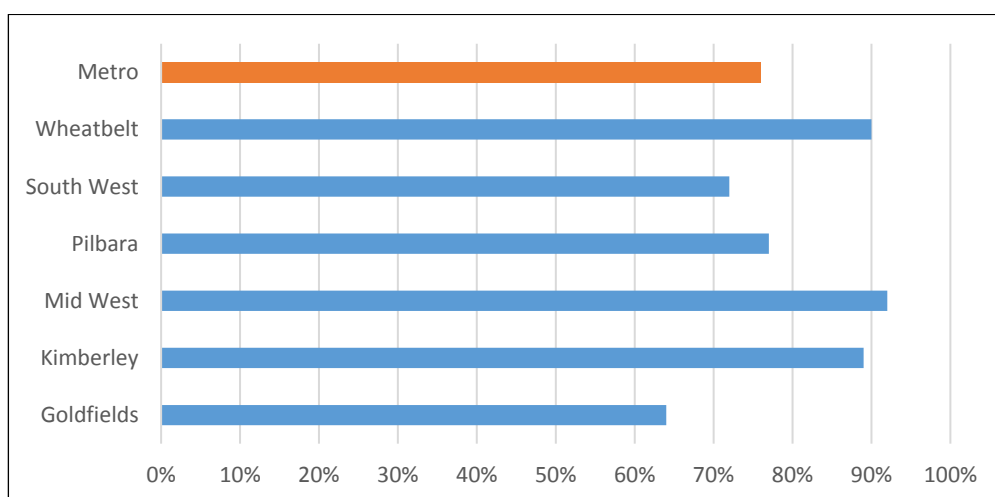
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Education researcher Dr John Halsey says good vocational opportunities in regional centres would enable young people to stay in the communities where they felt most comfortable.¹³⁵

The proportion of Year 12 students in regional and remote schools achieving a vocational qualification at Certificate II and higher was almost the same as in metropolitan schools, at nearly 60 per cent.

But Indigenous students, many in the regional areas, are over-represented in VET completions. In 2016, 91 per cent of Aboriginal students in year 12 completed a VET qualification, compared to about 60 per cent in the whole year 12 population. This is reflected in the participation rates for the Kimberley, Mid West and Wheatbelt, which are all higher than the metropolitan area, as shown in Figure 3.1.¹³⁶

Figure 3.1: Proportion of public school students (years 11 and 12) participating in VET by region, 2016



Source: Data sourced from *Review of VET in WA public schools*, Nous Group, June 2016.

As indicated in Table 3.1, regional students accounted for a quarter of the VET enrolments in public schools in the state.¹³⁷ The figure for government and non-government schools combined is 19 per cent.

¹³⁵ Eliza Borello, *Is Australia too focussed on sending country kids to university?* ABC News, AM, 27 September 2017.

¹³⁶ Nous Group, *Review of VET in WA public schools*, commissioned by Western Australian Department of Education, 28 June 2016, p36.

¹³⁷ Ms Anne Driscoll, Department of Training and Workforce Development, Letter, 16 October 2017.

Table 3.1: VET in Schools course enrolments by education region, 2016

School education region	Course enrolments	%
Metropolitan	36,091	74.3%
South Metropolitan	19,132	39.4%
North Metropolitan	16,959	34.9%
Regional	12,450	25.6%
South West	6,031	12.4%
Wheatbelt	2,205	4.5%
Mid West	1,379	2.8%
Kimberley	1,050	2.2%
Goldfields	908	1.9%
Pilbara	877	1.8%
<i>School education region not identified</i>	58	0.1%
Total	48,599	100.0%

Source: Department of Training and Workforce Development, *VET in Schools activity in 2016*, Attachment to letter, 16 October 2017.

The limited number of training providers means fewer courses can be offered

The limited number of RTOs in regional WA reduces opportunities for auspicings and for off-site delivery. Figures from the Training Accreditation Council (TAC) show the number of RTOs in each region of the state (see Table 3.2), but this data is based on the location of the RTO's head office rather than its delivery location.¹³⁸ It has not been possible to source data showing the number of RTOs delivering VET in Schools by region.

Table 3.2: Number of registered training organisations, by region, 2016

Region	Number of RTOs
Perth	212
South West	26
Peel	10
Goldfields	7
Kimberley	6
Pilbara	5
Mid West	5
Wheatbelt	4
Great Southern	3

¹³⁸ Training Accreditation Council Western Australia, *Annual Report 2015 -2016*, p18.

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The availability and quality of RTOs was identified as a challenge for regional communities in numerous submissions to the inquiry.¹³⁹

A contributor to the ASPA/WASSE submission noted that additional charges by RTOs could be excessive and limited a school's ability to engage with appropriate providers.

This was confirmed in a submission from a private training provider, which said that the inflated costs of equipment and/or venue hire, accommodation and food increased the costs to training organisations, which were then transmitted to potential clients. 'This unfortunately reduces the appetite to receive or deliver such programs.'¹⁴⁰

Several contributors noted that the cost of travel for RTO staff to visit schools to assess and moderate work was a problem, and some RTOs may even be unwilling to travel to remote areas.¹⁴¹

The School Curriculum and Standards Authority (SCSA) said that complications with school–RTO partnerships had a greater impact in regional and remote areas than in metropolitan areas, due to the limited VET delivery options. It could mean students were unable to continue with their VET program and complete their WA Certificate of Education (WACE).

This is recognised in SCSA's special considerations process, which accommodates students who are:

- Remote or regional based where there is an absence, or very restricted supply of training opportunities and viable partnerships.
- Adversely affected by school or RTO partnership issues or certification delays.¹⁴²

According to the DoE, schools north of the 26th parallel receive an additional amount of funding per student to support increased auspicings costs, but this is to no avail if there are no RTOs or they are unwilling to engage with schools.

139 See for example: Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals' Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p7; Submission No. 14 from Dr Tim McDonald, Catholic Education Western Australia, 7 August 2017, p3; Submission No. 15 from Ms Sharyn O'Neill, Department of Education, 7 August 2017, p6.

140 Submission No. 3 from Mr Alan Gregory, Australian Training Management Pty Ltd, 2 August 2017, p2.

141 Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals' Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p7; Submission No. 21 from Ms Bronwyn Blencowe, VETIS Consulting Services, 11 August 2017, p5.

142 Submission No. 17 from Prof Patrick Garnett, School Curriculum and Standards Authority, 7 August 2017, p9.

The alternative to a private RTO is to use a state training provider. The Department of Training and Workforce Development (DTWD) provides more TAFE-based profile places to regional areas in recognition of the challenges of obtaining service providers.

As shown in Table 3.3, more than half of the funding provided to TAFE colleges goes to regional colleges.

Table 3.3: Funding to TAFE colleges, by region, 2016

Region	Funding (\$ million)
Perth	\$10.1
Kimberley	\$2.9
Pilbara	\$2.7
South West	\$2.4
Wheatbelt	\$2.3
Mid West	\$2.0
Goldfields-Esperance	\$1.5
Great Southern	\$1.5
Peel	\$0.4
Gascoyne	\$0.2
TOTAL	\$26.0

Source: Department of Training and Workforce Development, Letter, 16 October 2017.

However, not all users have been satisfied with the regional TAFE colleges, with one describing them as ‘unreliable’¹⁴³ and another complaining that there were too many restrictions in terms of which courses could be auspiced.¹⁴⁴

The DoE is investigating the feasibility of becoming an RTO to support schools in difficult to service areas.¹⁴⁵ Another option so for schools themselves to become an RTO. Interestingly, of the 18 public schools that are RTOs, 12 are in regional areas, including the five WA College of Agriculture campuses. The range of certificates being delivered varies, with some schools offering certificates in eight subject areas and others offering just one or two.¹⁴⁶

There are currently no schools auspicings other schools.¹⁴⁷ This may be an opportunity for schools to consider in the delivery of VETiS in the regions.

143 Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals’ Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p7.

144 Submission No. 14 from Dr Tim McDonald, Catholic Education Western Australia, 7 August 2017, p3.

145 Submission No. 15 from Ms Sharyn O’Neill, Department of Education, 7 August 2017, Attachment 8.

146 School Curriculum and Standards Authority, *Statistical Reports, Table 5.14 Registered Training Organisation VET Offering Summary, 2016*. Available at: <https://www.scsa.wa.edu.au>.

147 Ms Sharyn O’Neill, Department of Education, Letter, dated 13 October 2017.

Industry workplace opportunities are restricted

Workplace learning opportunities are closely linked to the size and nature of a community, with very small communities lacking the range of businesses that would enable a wide range of opportunities for industry placement. It is therefore important for schools in regional and remote areas to align with local needs so that VET courses offered are relevant and appropriate for that particular area.

One example of this occurring is in the Great Southern town of Mount Barker, where the Mount Barker Community College offers certificates in Rural Operations and Agrifoods and Engineering. The principal reports that some businesses have had multiple placements and many students have gone on to full apprenticeships and employment in the local community after completing school-based apprenticeships or traineeships. Linking certificates to local needs had benefitted not only the students but also the community.¹⁴⁸

The former principal of Collie Senior High School (currently principal of Australind SHS) described the strong industry partnerships established with Premier Coal, Verve, Transfield Worley and South32, who he said were ‘preparing students to employ locally and to meet local needs’:

*they got a bit of buy-in to the training and were actually able to have some input into that development, into our programs, and how we went about educating those students for a very important workforce.*¹⁴⁹

He said that Margaret River, Albany and Australind senior high schools were working towards similar partnerships with local industry.¹⁵⁰

Finding 8

Linking VET in Schools qualifications to local needs can provide a useful transition to work in local communities.

Workplace learning opportunities are only useful if students are able to get to the workplace. Inadequate transport in regional areas, preventing students from participating in off-campus opportunities, was highlighted in the Rural and Remote Education Advisory Council’s (RREAC) 2016 report on Vocational Education and Training in Schools.

148 Submission No. 8 from Ms Leanne Prior, Mount Barker Community College, 7 August 2017, pp1-2.

149 Mr Dominic Camera, Principal, Australind Senior High School, *Transcript of Evidence*, 6 September 2017, p4.

150 *ibid.*

Nous Group has suggested establishing employment opportunities at schools as a way of overcoming this problem:

Establishing employment ‘incubators’ - for instance a commercial mechanic or horticultural business located at the school - has the potential to provide employment opportunities and thus address the challenges faced by Aboriginal students in rural areas. It provides a direct source of work experience and potential future employment.

However, it notes that there is a significant cost associated with such programs, which were unlikely to be able to be covered by existing school funds.

Recommendation 8

The Minister report to the Parliament on any progress being made in regard to the suggestion to establish businesses at regional schools which could provide employment opportunities for VET students.

The DTWD has partnered in the Kimberley with the Commonwealth to deliver the Aboriginal youth ranger program, which delivers locally tailored qualifications around conservation and agriculture area and provides work experience opportunities.¹⁵¹

Another suggestion is to offer programs that enable students to get their drivers’ licences by year 12, so that they do not have to rely on other forms of transport.¹⁵²

Finding 9

Educational outcomes are impacted by the incapacity of many students in regional areas to obtain a driver’s licence.

It is difficult to retain qualified VET teachers

Teacher attraction and retention is an ongoing challenge in regional and remote areas. For instance, in 2015 Karratha Senior High School had 34 new teachers (a 50% staff turnover) and has had an astounding 20 deputies in three years and six principals in six years.¹⁵³

For VET teachers there is the additional complication of maintaining currency in the industry area of the qualification they deliver. Principals and school executives say this is exacerbated in country schools due to distance, which creates difficulties in accessing

151 Mr Martin Clery, Acting Executive Director, Statewide Services, Department of Education, *Transcript of Evidence*, 13 September 2017, p5.

152 Submission No. 23 from Mr Mike Frost, Mike Frost and Associates, 21 August 2017, p7.

153 Rural and Remote Education Advisory Council, *Regional Report: Meetings in the Pilbara Region 26-28 October 2015*, n.d., p7.

Chapter 3

training in a timely and cost effective manner.¹⁵⁴ The DoE is aware of the difficulties and says it is working with the DTWD to address this. It says teachers are the public school system's greatest asset in delivering high-quality VET programs and must be well supported. This meant ensuring their training and qualification requirements were met, and required the support and input of industry, VET regulators, and DTWD.¹⁵⁵

A real problem here is that in regional areas there is a greater turn-over of staff and keeping an industry skilled teacher is often a challenge. All schools face the problem of course viability when skilled teachers move on. It is time consuming and resource intensive to keep training new VET deliverers, especially in specialised courses.

- ASPA/WASSESEA submission

In remote areas in particular, we have heard that schools will often train a teacher up to deliver a VET qualification at their school and then the teacher will leave the regional school to return to the city. Therefore, they have to find more money to train up a new teacher.

- AISWA submission

Lack of teachers can result in resources being under-used. For example, the Auditor General found that the Central Midlands High School's \$3.5 million Trade Training Centre is only used once a week because of a lack of qualified staff.¹⁵⁶

A report on the future of schools in the North Midlands region completed last year noted the difficulty of attracting general staff and the even greater difficulty in sourcing and attracting specialists, such as teachers with trades skills. Full-time positions for such staff were uncommon, making it necessary to find staff willing to work part-time or teach at more than one school.¹⁵⁷

Auspicing arrangements by schools rely on the very specific qualifications of

particular teachers. Program delivery is therefore reliant on the teacher or teachers remaining at the school for the duration of the program. One impact of this, according to one submission, is that schools sometimes attempt to complete a qualification in less time:

Staff turnover, particularly qualified trainers, impacts on the school's ability to sustain qualification offerings. These schools often have to try

154 Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals' Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p7.

155 Submission No. 15 from Ms Sharyn O'Neill, Department of Education, 7 August 2017, p5.

156 Office of the Auditor General Western Australia, *Vocational Education and Training for Year 11 and 12 Students in Public Schools*, December 2016, p25.

157 Peter and Barbara Browne, *Ten year education and training plan for the Morawa Shire and the wider North Midlands Region*, August 2016.

and get qualifications completed in a single school year as the possibility of the trainer not being there in the following year is highly likely.¹⁵⁸

Finding 10

The difficulty in attracting and/or retaining qualified teachers threatens the delivery of VET qualifications in regional and remote schools.

Recommendation 9

The Minister for Education and Training report back on initiatives to attract and retain VET qualified teachers in regional and remote schools.

The system does not cope well with student transiency

While student transiency occurs in some metropolitan areas, the incidence of students moving from school to school is much higher in regional and remote areas. While ATAR and General course offerings are reasonably consistent across schools, the same cannot be said of the VET courses. Hence, transient VET students are at risk of non-completion if equivalent certificate courses are not offered across school sites.

This has greater ramifications since the policy changes that dictate completion of a Certificate II to be awarded the WACE. This would be much harder to attain for students moving between schools.

There were ways around this, as outlined by the WA Secondary Schools Executive Association president. Some courses, such as the Certificate II in Business, were more easily transferable. If all schools delivered such a course, transient students would have the opportunity to continue working toward the qualification regardless of which school they attended. Online tools or teleconferencing could be used to ensure students at different schools were at the same stage.¹⁵⁹

Pilbara schools have worked on such a scheme, identifying qualifications that support the transient nature of some of their students.^{160 161}

Student numbers impact upon the viability of courses across all areas, with fewer students attracting less funding and making many VET courses financially unviable for delivery by an RTO. While in the metropolitan area a student may have the option to access a course of

158 Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals' Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p7.

159 Mrs Janette Gee, President, Western Australian Secondary School Executives Association, *Transcript of Evidence*, 6 September 2017, p8.

160 Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals' Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p7.

161 Mrs Janette Gee, President, Western Australian Secondary School Executives Association, *Transcript of Evidence*, 6 September 2017, p8.

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interest at another school, this is usually not possible in regional areas due to distance and cost.

The Rural and Remote Education Advisory Council says that these ‘thin markets’ mean that delivery of vocational qualifications in a regional location often cannot be centred on individual student career aspirations, but rather on what is available and easy to deliver by the school.¹⁶²

The DTWD says that it makes some concessions in some remote communities, allowing year 10s to participate in courses normally reserved only for year 11s and 12s:

to get a viable class, you need to bunch up year 10s, 11s and 12s, and we are more than happy to acknowledge the special circumstances that occur within those smaller communities.

Partnering with another school can sometimes be an option, as demonstrated by the partnership between Morawa District High School and WA College of Agriculture-Morawa, which has allowed it to offer a range of VET courses:

*One of the reasons Morawa DHS is able to provide a broader curriculum for years 11 and 12 is that it has meshed its timetables with the WA College of Agriculture-Morawa. This is an option seldom available elsewhere.*¹⁶³

Students finding it difficult to attend training due to personal circumstances may have access to support services provided by the DTWD. Certain pre-approved RTOs can apply for an additional 40 per cent in funding to provide mentoring, counselling, meals, transport and child care to students. Another program, the WA Group Training Program, provides incentives to group training organisations to take on Aboriginal and youth-at-risk apprentices and trainees who need additional support to commence or complete training. The funding incentives are provided at intervals throughout the apprenticeship, until completion.

Part of the DoE’s Work Plan, developed in response to two recent reviews, is designed to address regional issues such as availability and quality of RTOs, staff capacity and training costs, and access to appropriate and meaningful VET qualifications. Implementation of the plan has begun and is expected to continue throughout 2018.¹⁶⁴

162 Rural and Remote Education Advisory Council, *Vocational Education and Training in Schools*, April 2016, p8.

163 *Ten Year Education and Training Plan for The Morawa Shire and the Wider North Midlands Region*, August 2016, p35.

164 Submission No. 15 from Ms Sharyn O’Neill, Department of Education, 7 August 2017, p6.

Recommendation 10

The Department of Education considers mandating that public secondary schools offer at least a few Certificate II courses that are common to all schools, so that students can move between schools and still be able to meet WACE requirements for completing a Certificate II.

Chapter 4

Aligning the needs of students and industry

Balancing educational and training outcomes

Chapter One spoke of the separation of VET according to industry-specific qualifications and generic qualifications. With a few exceptions, industry groups believe VET in Schools should be producing students with specific qualifications that articulate directly to a trade. They want young people with relevant qualifications who are work-ready – they have had experience in a particular industry already and have been trained by trade professionals.

While TAFE was once the primary training ground for young people of 15 to 17 seeking vocational qualifications, these students are now more likely to stay at school with their peers to complete vocational training. As part of the education system, their vocational training requires an educational outcome. Students choosing the VET pathway must complete General maths and English courses in addition to their VET qualification, ensuring a minimum standard of numeracy and literacy. They must fulfil these and other requirements, such as completion of a Certificate II, to achieve their certificate of secondary education (WACE).

While the Department of Education (DoE) points out that students following the non-academic pathway usually spend only about one-third of their school time on the VET component, these students are still characterised as VET students. For example, a school's end-of-year awards are divided into ATAR achievement and VET achievement. These students are, in the main, being trained for entry to a trade or further vocational studies. In effect, the DoE has merged a training framework with an educational framework to deliver both an educational outcome (in the form of the WACE) and a training outcome.

Having a clear educational outcome is one of the reasons completion of the Certificate II as a requirement for the WACE was introduced, but this is another area where views are not aligned. In the education sector it seems to have a varying level of support. Some saw it as important for students to have a qualification when they leave school, and noted that many students were already achieving the Certificate II by graduation even before it was mandated.¹⁶⁵ Others have found it limits the range of courses

¹⁶⁵ Mrs Mary Griffiths, Principal, Armadale Senior High School, *Transcript of Evidence*, 6 September 2017, p2.

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students can explore,¹⁶⁶ and puts pressure on schools to provide courses that are linked to the certificates but not necessarily based on student interests or aspirations.¹⁶⁷

Industry does not seem to value the attainment of a Certificate II when seeking employees.¹⁶⁸ According to the State Training Board submission, the Industry Training Councils have indicated that employers are opting for training delivered in-house and customised to their needs:

*(Employers) value skills sets more than qualifications, and often need highly skilled staff with multiple competencies and skills sets. Hence, there is a preference for drawing relevant skills sets from different AQF qualifications without necessarily completing any. Trainees will only get a statement of attainment for those specific competencies completed and not a certificate, which contributes to a high number of non-completed qualifications.*¹⁶⁹

In some cases – particularly when delivered in partnership with an industry group – industry viewed the Certificate II more positively. For example, the Certificate II in Civil Construction delivered by Ertech Training Academy had apparently resulted in graduates commencing full-time employment with the company or with other major industry groups.¹⁷⁰

WASSEA president Janette Gee also said that many in industry did not necessarily want a graduate that had no qualifications. Rather, they wanted students that know how to learn, know how to inquire, know what it means to turn up to work on time, and know how to dress appropriately for a workplace, and this was what a Certificate II could provide:

*We need to prepare them to be good lifelong learners and to be good people in a workplace. I think that is what a cert II will do for them, whatever the cert II is in.*¹⁷¹

But in some cases a Certificate II could be a disadvantage for job-seekers, according to the WA Council of State School Organisations (WACSSO) submission, because

166 Submission No. 7, closed submission.

167 Miss Samantha Schofield, State School Teachers' Union of WA, *Transcript of Evidence*, 6 September 2017, p2.

168 See for example Submission No. 24 from Mr Kim Skoss, VET Coordinator, Manjimup Senior High School, 9 October 2017.

169 Submission No. 13 from Mr Jim Walker, State Training Board and Industry Training Council network, 7 August 2017, p16.

170 Submission No. 4 from Mr John Willett, Ertech Holdings, 2 August 2017, p1.

171 Mrs Janette Gee, WA Secondary School Executives Association, *Transcript of Evidence*, 6 September, p4.

employers have to pay them more than an apprentice with no qualification. In addition:

*the employer supposedly has to undo all of the ‘damage’ caused by different Registered Training Organisations participating in the VETiS program who fail to transfer industry specific knowledge and skills to the student.*¹⁷²

Holding a Certificate II also prevented graduates from enrolling in a pre-apprenticeship, according to one trainer and employer, because this was the same level qualification. But pre-apprenticeships were highly favoured by industry.¹⁷³

As an educational outcome, the Certificate II requirement has some value; for students seeking work, the value is not clear-cut. This depends to a large degree on how it is perceived by those in the industry in which the graduate is seeking employment. Whether a single qualification delivers a better outcome for students than a collection of units across a number of different qualifications remains to be seen and is something that should be monitored.

Recommendation 11

The Department of Education and the School Curriculum and Standards Authority should monitor whether the requirement to complete a Certificate II in order to graduate is delivering the best post-school outcomes for students.

Time to reunite?

If a large part of the DoE’s role now is to deliver training outcomes (as well as educational outcomes), it might be timely to consider the value of reuniting the DoE and the Department of Training and Workforce Development (DTWD). At present, the objectives of the two departments in relation to VETiS are not closely aligned, even though they say they consult and work closely together. Given that the DTWD is representing the interests of industry, its interest in the VETiS space is confined to industry-supported accredited courses and apprenticeships and traineeships (the VET component of the binary model presented in Chapter One).

There is no reason not to try to accommodate the current needs of industry, but there is also a place for transferable skills that could be usefully applied to industries not yet identified as areas of need.

172 Submission No. 19 from Ms Kylie Catto, WA Council of State School Organisations, 10 August 2017, p3.

173 Submission No. 1 from Mr Warren Cluff, The Apprenticeship and Traineeship Company, 20 July 2017, p2.

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Without addressing these needs, we run the risk of producing graduates that are too narrowly qualified and unable to meet the future needs of industry. At present, DTWD funds nearly one-fifth of the students completing VET, but only if they are undertaking apprenticeships or traineeships or industry-supported qualifications. DTWD allocated nearly \$30 million – around \$10 million more than the VET-specific funding provided by the DoE – to VET in Schools this year.

Finding 11

By focussing only on current industry-supported qualifications, the Department of Training and Workforce Development risks producing secondary school students that are ill equipped for future industries.

Were the departments to be better integrated, resources may be better deployed to deliver a broader range of outcomes for VET students. It would also create more opportunity to meet the Education Council's vision for VET, as outlined in *Preparing Secondary Students for Work*:

- *All secondary students experience quality vocational learning and have access to quality VET courses;*
- *Both vocational learning and VET are seamlessly integrated into secondary schooling and valued by students, parents, teachers and employers.*

While making education and training the responsibility of a single minister is a useful start, the seamless integration of the two aspects of VET – specific and generic – is more likely to be achievable if responsibility for delivery and funding is also integrated. A departmental director of VET may be another way of ensuring such delivery.

There is an opportunity for the education and training sectors to learn from one another so that graduates – and employers – have the best of both worlds. Rather than being confined to the classroom, a student may benefit from practical workplace experience; and a student with a trade skill may benefit from learning how to think flexibly and apply their knowledge more broadly.

Finding 12

The aspects of vocational learning and industry-specific training are not well integrated in secondary schools.

Recommendation 12

Consideration should be given to greater integration of the Department of Education and the Department of Training and Workforce Development to:

- a) Ensure philosophies on the education of secondary school students are aligned
- b) Focus resources on providing a range of course and workplace opportunities that will cater to the educational and training needs of secondary school students.

Collaboration is key

Several submissions commented on the need for industry to be involved in program delivery, and for schools to be receptive to that involvement.¹⁷⁴ Others detailed the difficulty of finding work placements for students. The State Training Board noted:

*there (are) opportunities to strengthen and formalise three-way collaborative networks between the education sector, training sector and industry so quality and other issues around offering work placements for school students, improving teachers' industry and vocational currency, providing career information and ensuring better alignment of VET qualifications to skilled and priority occupations can be addressed with industry input and assistance.*¹⁷⁵

The Minister for Education and Training and the State Training Board now meet regularly to ensure they are working towards the same goals. Evidence from the Training Construction Council illustrated that industry involvement results in a responsive education and training system (as outlined in Chapter Two).

Tasmanian-based VETiS consultant Mike Frost described a number of cases in which VETiS students had been involved in commercial operations. He gave the example of a Trade Training Centre (in Tasmania) which had provided labour hire for the local aquaculture, horticulture and hospitality industries, enabling trainees and apprentices and casual labour to be directly recruited. In another example, a Trade Training Centre (at a Queensland secondary college) leased its facilities to commercial training operations in return for access to industry standard training for its students.¹⁷⁶

A WA school is also realising the benefits of establishing closer ties with industry. The school has established a consortium involving several large automotive engineering companies/industry groups and the Utilities, Engineering, Electrical and Automotive Training Council. The partners offer workplace learning

A step forward would be a collaborative approach between schools, RTOs, industry and community stakeholders to identify what vocational learning programmes would look like for our students and how can we best support schools with the development of further programmes. - WASEA

- ASPA/WASSEA submission

¹⁷⁴ Submission No. 13 from Mr Jim Walker, State Training Board and Industry Training Council network, 7 August 2017, p11; Submission No. 23 from Mr Mike Frost, Mike Frost and Associates, 21 August 2017, p7; Submission No. 9 from Ms Sandra Robinson, Skills Strategies International, 7 August 2017, p4; Submission No. 7, closed submission; Submission No. 15 from Ms Sharyn O'Neill, Department of Education, 7 August 2017, p3.

¹⁷⁵ Submission No. 13 from Mr Jim Walker, State Training Board and Industry Training Council network, 7 August 2017, p13.

¹⁷⁶ Submission No. 23 from Mr Mike Frost, Mike Frost and Associates, 21 August 2017, p10.

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placements, further training and job opportunities post school.¹⁷⁷ Collie Senior High School has established similar industry partnerships, as described in Chapter Three.

WACSSO believes there is also an opportunity for government agencies, which deliver a wide range of services and are located throughout the state, to commit to hosting work placements for VET students. This would increase the number of work placements available and relieve the pressure on businesses struggling to find placements for students. WACSSO says its suggestion has been ‘met with enthusiasm’ by the State Government and it is eager to see the plan take effect.¹⁷⁸

What do students think?

The student voice is often the missing element in documents and debates about education, even though they are the consumers.¹⁷⁹ Students were invited to provide their views on VETiS as part of this inquiry via an online survey (see Appendix Three for details of how this was conducted). While the survey is not a representative sample of the Western Australian senior secondary population, there were some useful comments to open-ended questions from the 53 respondents. Twenty parents also responded to the survey.

Quite a few students and parents indicated they would like to see a broader range of courses. Many chose the course they were currently enrolled in because it was the only option or the best option, and not necessarily because it was something they particularly wanted to pursue. Despite this, around two-thirds of the student respondents thought they would use the skills they had learnt in the future.

We only have one choice. Not many of us like this option, we wish we had more options

- student survey respondent

Interestingly, only six of the twenty parents indicated that they hoped their son or daughter would achieve the WACE through VET; the main expectation of VET for the others was that their student would develop skills for work or go on to

further study. While most parents did not have to pay for their students’ VET studies, six said that cost was a major consideration. One student had ‘dropped out of Cert II as the only available option was hospitality or automotive. To do business, had to pay \$3000 per semester to TAFE.’

177 Submission No. 7, closed submission.

178 Submission No. 19 from Ms Kylie Catto, WA Council of State School Organisations, 10 August 2017, p3.

179 The Committee notes that the Auditor General’s report into VETiS included some interviews with students.

Students were generally happy with their VET teachers, and had had very positive experiences with work placements, even though this could be difficult to organise and to get to:

Work placement is a really good program to get you used to the work. My first work experience was nerve wracking, but as you go, you become more used to it and able to do proper work. I really love this program.

Organising work placements was sometimes left to parents, who often called on personal contacts to set something up:

As a parent I have done all the work. School looks after ATAR students and it is left totally up to families to organise something. Most kids just have a holiday instead.

Some students mentioned that VET options were not well publicised in their school. Better promotion of VET to students and their parents was mentioned by other contributors to the inquiry.

More effective promotion is needed

The State Training Board points out that although only around one-third of young people attend university, university pathways are more heavily promoted in school than VET training. It suggests a promotional campaign showcasing a portfolio of VET pathways which lead to skilled and priority occupations. This would be targeted at students and the broader community to enhance the image of vocational training and TAFE.

Effective marketing strategies are ‘vital’, according to VET consultant Mike Frost, but principals and school executives say that career guidance within schools is also important to ensure students understand how to combine VET with other school studies.¹⁸⁰

The ASPA/WASSEA submission noted that some parents still view a student’s enrolment in the VET pathway as a failure, not enhancement of the child’s educational opportunities:

Parents and community members need to be engaged and gain an understanding that the educational opportunities and pathways available today through VET provision are an exciting and viable

180 Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals’ Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p14.

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addition to a student's skill set. The many benefits of VET and workplace immersion and the way they can prepare young people to be job ready and employment focussed will prove to be a definitive need in the future.¹⁸¹

Student needs must be at the centre

This inquiry has highlighted the complex nature of providing vocational education and training to school students. VET in Schools is a program of many moving parts, involving the public school sector, the independent and Catholic school sectors, two government departments, private state training providers (TAFE), private registered training organisations, industry training councils, employers, two regulatory bodies (TAC and ASQA), the SCSA, and of course teachers and their registration body. Having grown rapidly in a short period, it has not been surprising to find that managing this vast and diverse program has been a challenge.

Although employers could be considered the ultimate end users of VET in Schools (and industry groups certainly see their interests as central to the delivery of VET), the program is intended to serve the needs of school students. As such, the Department of Education needs to monitor effectively all aspects of the program to ensure it is meeting student needs. Some students, unsure about what kind of job they want to pursue, will be content to undertake generic courses that will be useful regardless of their future pathway. Others may have a specific industry or further qualification in mind, and ideally, they would be given the opportunity to undertake courses that will lead them there.

The Committee has heard that for a variety of reasons not all students are able to pursue the courses they would like, or that meet their requirements. If first choices are not available, schools must still do their best to educate students and to keep them engaged. The Department of Education can further support schools to assist them in navigating their way through the VET system, so that they can feel assured they are providing the best possible opportunity for students to achieve a valuable outcome.



MS J.M. FREEMAN, MLA
CHAIR

181 Submission No. 12 from Mr Rob Nairn, Australian Secondary Principals' Association and Mrs Janette Gee, WA Secondary School Executives Association, 7 August 2017, p14.

Appendix One

Inquiry Terms of Reference

Inquiry into the delivery of the Vocational Education and Training in Schools (VETiS) program. The inquiry will consider:

- How well the program is meeting the needs of schools, students and industry
- Challenges for regional and remote areas
- Registration and ongoing monitoring of training organisations
- Resourcing of the program

Appendix Two

Committee's functions and powers

The functions of the Committee are to review and report to the Assembly on:

- a) the outcomes and administration of the departments within the Committee's portfolio responsibilities;
- b) annual reports of government departments laid on the Table of the House;
- c) the adequacy of legislation and regulations within its jurisdiction; and
- d) any matters referred to it by the Assembly including a bill, motion, petition, vote or expenditure, other financial matter, report or paper.

At the commencement of each Parliament and as often thereafter as the Speaker considers necessary, the Speaker will determine and table a schedule showing the portfolio responsibilities for each committee. Annual reports of government departments and authorities tabled in the Assembly will stand referred to the relevant committee for any inquiry the committee may make.

Whenever a committee receives or determines for itself fresh or amended terms of reference, the committee will forward them to each standing and select committee of the Assembly and Joint Committee of the Assembly and Council. The Speaker will announce them to the Assembly at the next opportunity and arrange for them to be placed on the notice boards of the Assembly.

Appendix Three

Inquiry establishment and evidence gathering

In accordance with its functions and powers, the Committee notified the Speaker of the Legislative Assembly of its intention to undertake this inquiry on 28 June 2017. An advertisement for submissions appeared in *The West Australian* newspaper on 8 July 2017. The Committee also wrote to key stakeholders inviting them to make a submission.

The Committee received 24 submissions (one accepted as a closed submission) from training organisations, industry groups, commercial enterprises, schools, school associations and teacher representatives, and government departments and agencies (see Appendix Four).

The Committee conducted five hearings involving 17 witnesses (see Appendix Five).

The Committee also created two separate (but similar) online surveys for VET students and their parents. This was to gather insights that might have otherwise been missed, since there was no student body (or specific body for parents of VET students) which could be approached to make a submission.

The links to the surveys were accessible from the Committee's inquiry webpage and remained active for four weeks. The newspaper advertisement directed students and parents to the links on the webpage. The survey was also promoted on the WA Council of State School Organisations' Facebook page, and by members of the Committee via social media.

There were 53 responses to the student survey, half from government schools and half from independent schools. Half were from metropolitan schools and half from regional schools. Twenty parents responded, of which 17 had VET students at government schools. Seven had students at metropolitan schools while 13 were from regional schools.

Appendix Four

Submissions received

No.	Name	Position	Organisation
1	Mr Warren Cluff	Chief Operating Officer	The Apprenticeship and Traineeship Company
2	Mr Colin Pettit	Commissioner	Commissioner for Children and Young People WA
3	Mr Alan Gregory	Chief Operating Officer	Australian Training Management Pty Ltd
4	Mr John Willett	Manager	Ertech Holdings
5	Ms Louise Kingston	Owner/manager	Access Engineering
6	Mr Wayne Wilson	Apprenticeship and Traineeship Coordinator	MPA Skills
7	Closed submission		
8	Ms Leanne Prior	Associate Principal	Mount Barker Community College
9	Ms Sandra Robinson	Director	Skills Strategies International
10	Mr Ian Hill	Chairman	Training Accreditation Council WA
11	Ms Corinne Brown	Trainer/assessor	
12	Mr Rob Nairn	Executive Director	Australian Secondary Principals' Association
	Mrs Janette Gee	President	WA Secondary School Executives Association
13	Mr Jim Walker	Chair	State Training Board/Industry Training Councils
14	Dr Tim McDonald	Executive Director	Catholic Education WA
15	Ms Sharyn O'Neill	Director General	Department of Education
16	Dr Ross Kelly	Director Policy Planning and Research	Department of Training and Workforce Development
17	Mr Patrick Garnett	Chair	School Curriculum and Standards Authority

18	Mr Mark Paterson AO	Chief Commissioner and Chief Executive Officer	Australian Skills Quality Authority
19	Ms Kylie Catto	President	WA Council of State School Organisations
20	Miss Samantha Schofield	Vice President	State School Teachers' Union of WA
21	Ms Bronwyn Blencowe	Managing Director	VETiS Consulting Services
22	Mr Wade McLeod	VET Consultant	Association of Independent Schools WA
23	Mr Mike Frost	Director	Mike Frost and Associates
24	Mr Kim Skoss	VET Coordinator	Manjimup Senior High School

Appendix Five

Hearings

Date	Name	Position	Organisation
16 August 2017	Mr James Walker	Chair	State Training Board
	Ms Kathleen Hoare	Director	
	Mr Alan Davis	Director Skills Development	Construction Training Council
6 September 2017	Miss Samantha Schofield	Vice President	State School Teachers' Union of WA
6 September 2017	Mrs Janette Gee	President/Director	WA Secondary School Executives Association/ Australian Secondary Principals' Association Board
	Mrs Mary Griffiths	Principal	Armadale Senior High School
	Mrs Janice Sander	Principal	Mindarie Senior College
	Mr Domenic Camera	Principal	Australind Senior High School
	Ms Melissa Gillett	Principal	John Forrest Secondary College
	Mr Ian Johnston	Principal	Greenwood College
13 September 2017	Ms Sharyn O'Neill	Director General	Department of Education
	Mr Lindsay Hale	Acting Deputy Director General, Schools	
	Mr Martin Clery	Acting Executive Director, Statewide Services	

13 September 2017	Ms Anne Driscoll	Acting Director General	Department of Training and Workforce Development
	Mr Simon Walker	Executive Director, Policy Planning and Innovation	
	Dr Ross Kelly	Director, Policy Planning and Research	
	Ms Karen Purdy	Manager, VET System Policy	

Appendix Six

Acronyms

AISWA	Association of Independent Schools of Western Australia
AQF	Australian Qualifications Framework
ASBT	Aboriginal school-based training program
ASQA	Australian Skills Quality Authority
ATAR	Australian Tertiary Admission Rank
DTWD	Department of Training and Workforce Development
NCVER	National Centre for Vocational Education Research
PAiS	Pre-apprenticeships in schools
RTO	registered training organisation
SBA	school-based apprenticeship
SBT	school-based traineeship
SCSA	School Curriculum and Standards Authority
SIA	Strategic Industry Audit (of VET in Schools, undertaken by TAC)
TAC	Training Accreditation Council
TAE	Training and Assessment (certificate qualification for VET teachers)
WACE	WA Certificate of Education
WACSSO	WA Council of State School Organisations

Appendix Seven

WACE requirements and examples of course combinations for years 11 and 12

Extracts from WACE Manual 2017, published by the School Curriculum and Standards Authority, pp4-6

Summary of WACE achievement requirements

General requirements

Students must:

- demonstrate a minimum standard of literacy and a minimum standard of numeracy
- complete a minimum of 20 units, or equivalents as described below
- complete at least four Year 12 ATAR courses* or complete a Certificate II** (or higher***) VET qualification.

*In the context of ATAR courses in the WACE, the term 'complete' requires that a student sits the ATAR course examination or has an approved sickness/misadventure application for not sitting the examination in that course. Students who do not sit the ATAR course examination will not have a course mark or grade recorded on their WASSA, nor will they receive an ATAR course report.

Note: for ATAR courses with practical components, students must complete both the written and practical examinations.

**In the context of VET in the WACE, the term 'complete' requires that a student has been deemed competent in all units of competency that make up a full qualification.

***The partial completion of a Certificate III or higher VET qualification may meet this requirement according to predetermined criteria

Breadth and depth requirement

Students must:

- complete a minimum of 20 units, which may include unit equivalents attained through VET and/or endorsed programs. This requirement must include at least:
 - a minimum of ten Year 12 units, or the equivalent

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- four units from an English course, post-Year 10, including at least one pair of Year 12 units from an English course
- one pair of Year 12 units from each of List A (arts/languages/social sciences) and List B (mathematics/science/technology). (See table in sub-section 7.2.1)

Achievement standard

Students must achieve at least 14 C grades or higher (or the equivalent, see below) in Year 11 and 12 units, including at least six C grades (or equivalents) in Year 12 units.

Unit equivalence

Unit equivalence can be obtained through VET qualifications undertaken as VET credit transfer and/or endorsed programs. The maximum unit equivalence available is eight units – four Year 11 units and four Year 12 units. Students may obtain unit equivalence as follows:

- up to eight unit equivalents through completion of VET qualifications, or
- up to four unit equivalents through completion of endorsed programs, or
- up to eight unit equivalents through a combination of VET qualifications and endorsed programs, but with endorsed programs contributing no more than four unit equivalents.

For VET qualifications:

- a Certificate I is equivalent to two Year 11 units
- a Certificate II is equivalent to two Year 11 and two Year 12 units
- a Certificate III or higher is equivalent to two Year 11 and four Year 12 units
- a partially completed Certificate III or higher is equivalent to two Year 11 and two Year 12 units (credit only allocated if the criteria for partial completion are met).

For endorsed programs, unit equivalence is identified on the Authority's approved list of endorsed programs

Examples of study options

Student	Courses and programs	Eligible for WACE certification	Eligible for ATAR
A	six Year 11 ATAR courses five Year 12 ATAR courses	Yes (22 units, 10 Year 12)	Yes*
B	four Year 11 ATAR courses two Year 11 General or Foundation courses four Year 12 ATAR courses two Year 12 General or Foundation courses	Yes (24 units, 12 Year 12)	Yes*
C	four Year 11 ATAR courses two Year 11 General or Foundation courses two Year 12 ATAR courses four Year 12 General or Foundation courses	No (24 units, 12 Year 12) missing a Certificate II or higher	No
D	four Year 11 ATAR courses two Year 11 General or Foundation courses one Year 12 ATAR course two Year 12 General or Foundation courses VET Certificate II – attributed to Year 11 (two unit equivalents) and Year 12 (two unit equivalents) Endorsed program: Workplace Learning (two unit equivalents, 110 hours) – attributed to Year 12	Yes (24 units, 10 Year 12)	No
E	four Year 11 General or Foundation courses VET Certificate I – attributed to Year 11 (two unit equivalents) four Year 12 General or Foundation courses VET Certificate II – attributed to Year 11 (two unit equivalents) and Year 12 (two unit equivalents)	Yes (22 units, 10 Year 12)	No
F	four General or Foundation Year 11 courses Certificate II VET industry specific course – attributed to Year 11 (two course units) and Year 12 (two course units) four Year 12 General or Foundation courses Endorsed program: Workplace Learning (two unit equivalents, 110 hours) – attributed to Year 12	Yes (20 units, 10 Year 12) Certificate II completed as part of VET industry specific course	No
G	three Year 11 General or Foundation courses Certificate I – attributed to Year 11 (two unit equivalents) four Year 12 General or Foundation courses VET Certificate II – attributed to Year 11 (two unit equivalents) and Year 12 (two unit equivalents) Endorsed program: Workplace Learning (two unit equivalents, 110 hours) – attributed to Year 12	Yes (22 units, 12 Year 12)	No

Appendix 7

H	three Year 11 General or Foundation courses VET Certificate I – attributed to Year 11 (two unit equivalents) three Year 12 General or Foundation courses VET Certificate II – attributed to Year 11 (two unit equivalents) and Year 12 (two unit equivalents) Endorsed program: Workplace Learning (two unit equivalents, 110 hours) – attributed to Year 12	Yes (20 units, 10 Year 12)	No
I	four Year 11 General or Foundation courses four Year 12 General or Foundation courses VET Certificate III – attributed to Year 11 (two unit equivalents) and Year 12 (four unit equivalents) Endorsed program: Workplace Learning (two unit equivalents, 110 hours) – attributed to Year 11	Yes (24 units, 12 Year 12)	No

*Excluding unacceptable combinations