



national
electrical and
communications
association

NECA response to Quality of VET in Assessment Discussion Paper

Prepared by: Suresh Manickam

Date: 11 March 2016

NATIONAL OFFICE

Level 4,
30 Atchison Street,
St Leonards NSW 2065
Locked Bag 1818,
St Leonards NSW 1590

T +61 2 9439 8523
F +61 2 9439 8525
E necanat@neca.asn.au
W www.neca.asn.au
ABN 78 319 016 742

11 March 2016

Senator Scott Ryan
Minister for Vocational Education
PO Box 6100
Parliament House
CANBERRA ACT 2600

Re: NECA response to Quality of VET in Assessment Discussion Paper

Thank you for the opportunity to provide comment to the quality in assessment of vocational education and training discussion paper.

The National Electrical and Communications Association (NECA) is the peak industry body for Australia's electrical and communications contracting industry that employs more than 145,000 workers with an annual turnover in excess of \$23 Billion. Our sector is a key component of the economic fabric of the nation we represent 4,500 electrical contracting businesses throughout Australia.

NECA also plays a significant role in the Vocational Education and Training (VET) space, maintaining responsibility for the employment, learning and skilling of more than 4,000 apprentices who will develop into future electricians and contractors, through our Group Training and Registered Training Organisations. One in three electrical apprentices across Australia is a NECA apprentice.

As the peak representative body for electrical contractors, we feel well qualified to provide background input for this discussion paper. NECA has previously provided input through a range of submissions and comments into previous Government inquiries and discussion papers such as *Contestable models for Industry Engagement in Training*, *Draft revised RTO standards*, *the Review of training packages and accredited courses* and *VET training in the Australian Capital Territory*.

We have also undertaken extensive consultations with employers and other key stakeholders to examine the strengths of the current apprenticeship system in order to

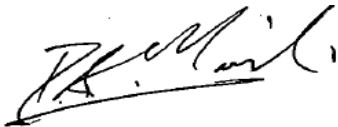
identify areas which could be improved for employers and apprentices in training for Certificate III in Electrotechnology.

A key challenge for the electrical contracting industry as we move towards the latter part of the decade is a shortage in the supply of skilled electrical workers due to the reduction in the take up and completion of apprenticeships and the retirement of highly skilled, long term electricians at the other end of the age scale. Therefore, NECA strongly believes that quality education, skills and training outcomes are critical to the future success of the electrical trade and we support VET sector reforms that improve and strengthen assessment processes that will lead to more effectively skilled electrician and contractor.

Our member feedback and own experience within the Vocational Education and Training sector suggests that the certain practices of operators have not always led to the delivery of quality, job ready graduates with the skills required by industry.

I am more than happy to discuss this submission further and can be contacted on (02) 9439 8523 or email: suresh.manickam@neca.asn.au

Yours faithfully



Suresh Manickam
Chief Executive Officer
National Electrical and Communications Association (NECA)

RTO Limitations

NECA is not concerned about the number of Registered Training Organisations (RTOs) with the scope to deliver Training and Education (TAE) packages in the marketplace and therefore does not support a limitation on these numbers.

We are a supporter of a nationally competitive training market comprising public and private RTOs, regulated by one national VET regulator. In theory, this should lead to the greater provision of quality training and standards. NECA has long argued that training and learning assessment practices must be relevant to the future needs of industry.

Training organisations must operate in an environment where assessment strategies reflect the changing needs, skills and technological advancements of industry are accounted for whilst an effective compliance and monitoring regime is in place to ensure that quality TAE outcomes are delivered.

NECA, in its submission to the 2014 Draft Revised RTO standards argued that VET sector reforms could boost confidence and participation in the sector by enhanced enforcement provisions and oversight for the Australian Skills Qualifications Authority (ASQA) and the introduction of a single, national regulator to overcome the lack of consistency in the auditing of training providers. We believe that a single, national regulator is in a stronger position to more consistently measure and audit training providers to ensure compliance with the standards and penalise those RTOs who consistently fail the standards and deliver low quality training outcomes

Whilst there's no doubt that some poorly administered training providers have served to drag down the reputation of the VET sector, NECA has strongly argued that regulators need to have the necessary resources to enforce standards and ensure that action is taken against those providers who continue to remain non-compliant. This includes a proper compliance and auditing program which would see improvement orders or penalty action taken against providers who continually fail the industry¹.

NECA considers the current audit process is far too focused on inputs, rather than outputs and employer and student outcomes and considerations.

¹ <http://www.news.com.au/finance/work/careers/training-college-australian-institute-of-professional-education-has-licence-revoked-by-regulator/news-story/1b093d720075f0ddb23e92f5a3d347bd>

Training providers that continue to deliver quality training outcomes should be allowed to service to the sector and not be penalised by the actions of those providers who don't serve the best interests of the sector.

Skills and Qualifications of Trainers and Assessors

NECA wishes to encourage vibrant training outcomes that meet the needs of the electrical contracting sector. While many RTOs rely on centrally developed or commercially purchased training and assessment tools, NECA believes that it's a basic expectation that all VET trainers should be able to effectively develop assessment tools that clearly meet the required aspects of evidence against the performance criteria outlined in each unit of competency. Thus a core unit on the development of assessment tools and strategies should be a fundamental component of the Certificate IV qualification.

It is disappointing that a number of State Departments invested heavily in professional development for their trainers. It is unclear of what the outcomes of this investment for of taxpayer dollars has been. It may be useful to examine these products and processes with a view to disseminating them through the sector.

In any training package update or development process, it is important to give an opportunity to all stakeholders to express their views on the content, approaches and overall validity of the training package products. However, recognition and weighting should be given to key stakeholders who have greater exposure, knowledge and experience who can bring a broader industry view to the table.

NECA, in its response to the Review of Training Packages and Accredited Courses Discussion paper in 2015 argued that an industry based and supported RTO is the best way to ensure that learning and assessment is maintained and delivered.

The delivery of high quality training and assessment is reliant upon the skills and knowledge of the trainers and assessors within the electrical sector and NECA believes that an industry based and supported RTO can ensure that a trainers skills and standards be maintained to ensure that knowledge and practice of vocational training, learning and assessment can be kept.

We believe that those who deliver the education and training, as a minimum requirement, must hold that same level of qualification and must contain and be able to demonstrate a range of current industry skills that is directly relevant to the training and assessment that they provide.

It may also be useful to reexamine the separate roles of workplace assessors and teachers. Consideration should be given to reconstituting the different roles and allowing specialisation through designated units of competence.

The establishment of a VET Professional Association

A number of attempts have been made in past years to establish a professional body along these lines. Whilst NECA agrees that practices within the VET sector need improvement, we don't believe that it's the role of Government to help establish such a body.

NECA has consistently argued that the best role that Government can play to reform and improve VET sector standards is to give ASQA the necessary resources and teeth to assist poorly performing operators to comply with the necessary standards and strong enough powers to remove rogue operators, who continue to remain non-compliant.

It may be useful for Governments, through the NCVER, to undertake research into good, best and poor practices within assessment, workplace training and off the job training.

NECA has established an advisory group which focuses upon, amongst other items, the improvement of training quality and assessment within the electrical industry. NECA, also through its own RTOS, has invested considerable resources in upskilling its teachers and promoting best practice.

Increasing Industry Confidence

A key factor in the decline of industry satisfaction and confidence with the outcomes of the sector was a lack of engagement with industry. Increasing industry confidence and participation in the VET sector is critical to ensuring that employers believe in the ability of the training system to deliver credible and skilled job ready graduates to meet employment requirements.

The new Standards for Registered Training Organisations (RTOs) 2015 requires an RTO's training and assessment strategies and practices to be responsive to industry and learner needs whilst meeting the requirements of training packages and VET accredited courses. These Standards make reference to:

- The RTO's training and assessment practices are relevant to the needs of industry and informed by industry engagement; and
- The RTO implements a range of strategies for industry engagement and systematically uses the outcome of that industry engagement to ensure the industry relevance of:
 - a) its training and assessment strategies, practices and resources; and
 - b) the current industry skills of its trainers and assessors.

While the tightening of compliance standards are welcome, NECA believes there are further ways to boost industry confidence are governance related, such as through the auditing process and clearer reporting requirements.

Not all employers are generally convinced that all RTOs meet the necessary standards or that the regulator is well placed to audit operators against the standards. As argued in NECA's VET Reform submission in 2014, our member feedback suggests that a lack of transparent regulation and auditing across jurisdictions has often led to confusion.

A recent statistic of the ASQA indicating that 80% of audited RTO's contained compliance concerns but when given 20 days to fix the concerns, the figure dropped to just 25%. If it is the case that a significant minority of RTOs are fundamentally non-compliant, then action should be taken, not only to protect and strengthen the reputation of the sector but also to address the significant competitive disadvantage that RTO's such as NECA face who heavily invest in compliance, training and governance.

Consistency in the auditing of training providers across both ASQA and VET regulators also remains a concern for NECA. The “free rider” system that has allowed many RTO’s to avoid various levels of compliance whilst good corporate RTOs continue to commit extensive resources and expenditure to uphold the standards of compliance needs to be removed. NECA has previously called for the introduction of a single, national VET regulator to overcome the lack of consistency.

It is important that ASQA, and other regulators, have the necessary power and resources to enforce compliance standards and penalise those providers who continually remain non-compliant. A focus on training outcomes is imperative.

The medium to long term road for improving standards should also include great industry involvement in the accreditation/award continuum. If we consider the VET provider standards as the minimum standard, then the winners of the training awards for VET providers is best practice. In between is an improvement continuum where there should be a greater role for industry in recognising the better providers and informing the market.

Other measures to boost industry confidence and participation are funding related. The removal of CPI increases on funding delivery amongst other cuts has led to a position where RTOs are essentially being asked to deliver greater outcomes with lower levels of funding.

Employers are becoming increasingly concerned with the costs of apprenticeships. This circle of increased costs and red tape, a lack of engagement, funding and increased red tape has not led to a culture of improved quality but rather has made room for the perception of rorts such as the delivery of free laptops for each and every student on course sign up.

The role of industry in assessment

Industry can play a significant role in endorsement of vocational outcomes related to collecting evidence and judgements about whether competency has been achieved.

Training Packages have the ability to mandate expectations of assessment practice based on industry expectations of training outcomes and certain given contexts for the demonstration of vocational skills

It is critical when using a competency based approach to learning, that assessment is rigorous and that there is comparability between the skills acquired by students undertaking the same course in different institutions.

Some industry sectors have developed external assessment processes that allow employers or regulatory and licensing bodies to set a clear occupational benchmark for graduating students. The Electrical Contracting sector is a strong example, particularly with regards to pre-apprentice testing and in some states, capstone assessment.

Given the “high-risk” nature of our sector and its stringent technical and safety requirements, an apprentice’s readiness to commence an apprentice is vital. Therefore, NECA strongly supports pre-apprenticeship programs and recommends that a national funding approach be adopted.

NECA supports the introduction of a national benchmark entry test that identifies and addresses potential barriers to success before a candidate begins their apprenticeship. This test would include a recruitment tool with an inbuilt focus on numeracy and literacy skills to ensure that potential candidates have the technical capacity to undertake their training and to assist RTOs.

Other key industry entry requirements could include the need for a driver’s licence, drug and alcohol testing, police checks and general medical tests.

NECA supports the conduct of a technical theory and practical Capstone test at the completion of the Certificate III in Electrotechnology. Currently, in Victoria, the regulator has responsibility for the conduct of the Capstone tests but in other states, Capstone assessment is conducted by an RTO after the completion of all other

assessment requirements of the Certificate III Electrician qualification to provide assurance to electrical regulatory authorities of the quality of the candidate presenting for an electrician's licence. The capstone test requires that a learner undertake a 6-8 hour test comprised of 70% practical and 30% written.

In the electrical industry, it is imperative that all competencies are validated in the workplace. This is particularly the core of the key entry points of the industry through the Certificate III in Electrotechnology and Certificate III in Communications. In these courses, assessment is critical, particularly around our final validation through the capstone test. We are concerned at the high failure rate of fourth year apprentices undertaking the capstone test. NECA is undertaking a range of work in this area and will issue a position paper on this matter in the near future.

NECA also supports the maintenance of compulsory profiling systems that tracks and measures the collected evidence of work performed by an apprentice in the workplace for all Electrotechnology apprentices.

Industry expectations and graduate capabilities

NECA believes that quality education, skills and training initiatives are critical for the development of the electrical trade, given the "high-risk" nature of our sector and its stringent technical and safety requirements.

Electrical contractors expect that graduates should be equipped with the necessary skills and knowledge required by industry and to be fully competent and tradesman level on completion of their apprenticeship. These skills should reflect the performance criteria of each unit of competency and the foundation skills requirements for that unit.

RTOs should be measured against their successful employment rate of apprentices following of their apprenticeship completion.