

3 March 2015

## **Response to discussion paper ‘Review of Training Packages and Accredited Courses’**

This paper uses evidence from research undertaken by a team of researchers to argue for some changes and improvements in Training Packages. While we advocate the retention of Training Packages in much the same configuration as the current system, our research indicates some areas for improvement and a new approach to the acknowledged purpose of Training Packages.

We do not address all the points raised in the discussion paper; only those that are most closely related to our research.

The team consists of Erica Smith and Andy Smith (Federation University Australia); and Ian Hampson and Anne Junor (University of New South Wales).

### **The basis for our submission**

The paper is written on behalf of a team of researchers who have been working with Industry Skills Councils for three years on a project funded by the Australian Research Council (ARC), ‘*Recognising the skill in jobs traditionally considered unskilled*’. The project can be seen on the National Research Data web site at

<http://researchdata.andcs.org.au/recognising-skill-jobs-considered-unskilled/346952>

More information can be found on the Federation University Australia web site at

<http://federation.edu.au/faculties-and-schools/faculty-of-education-and-arts/research/fea-research-groups/rave-researching-adult-and-vocational-education/folder2/recognising-skills>

In this research project we examined, in detail, nine occupations from a range of industries that are covered in total by three Industry Skills Councils (ISCs). Two of the ISCs (MSA and SSA) have been formal industry partners for the duration of the project. Part of this work involved comparing the skills in those occupations, gained by extensive fieldwork, with the relevant Training Package qualifications. This stemmed from our belief that under-recognised skills might not be addressed in the qualification documents. The systematic comparison process provided new insights into Training Packages. Our findings were shared at a meeting of twenty national stakeholders in February 2015, and the outcomes of that meeting are included in this paper.

In addition, team members have been, and are, researching the use of Training Packages in other national research projects, including an ARC project on skills for the aviation industry, an ARC project on Enterprise RTOs, and a new NCVER-funded project on employer training, which draws on earlier work on enterprises’ use of nationally-recognised training.

In addition to our current research, members of the research team have been involved in other ways with Training Packages and their antecedents over a period of two decades, including:

- Involvement in national project groups for development and review of Training Packages;
- Authored scholarly and practitioner papers on Training Packages, including the ‘classic’ Australian textbook, *From training reform to Training Packages*;
- Earlier national projects on the implementation of competency-based training (funded by the Commonwealth government) and of VET teachers’ use of CBT (funded by ANTA’s Research Advisory Committee);
- Teaching students at all levels (Cert IV to PhD) about Training Packages;
- Liaison with overseas academics and bodies on their national VET systems and qualifications;
- Writing reviews of the Australian Training Package system for overseas bodies.

Two of the research team have also been VET-sector managers, in public and private sectors, and one has worked as the executive director of a State ITAB, working with industry on the development of Training Packages, and with a range of RTOs on their implementation. The researchers also have prior careers in human resource management and development in industry.

### **Overview**

Our experiences working on this and other projects have confirmed our view that Training Packages are an integral part of the VET system in Australia. Their role in national consistency and transparency is vital. However there are also some difficult problems, which relate to

- quality and perceived quality of training delivery;
- industry confidence in the system;
- inadequate assessment of individual units of competency; and
- inadequacy of the skills and knowledge of the VET workforce to work confidently and effectively with Training Packages as they currently stand.

All of these issues – except the last, which is a highly significant problem – are well canvassed in the consultation paper, which sets out the issues very well. It is also the case that the problems listed above have been well recognised and discussed in the sector for a long time, (and indeed were presaged when Training Packages were introduced), and that efforts have been undertaken in recent years to address them.

We would argue, however, that these efforts have not been very successful. The ‘streamlining’ process, while held up by the change in government and therefore not easily evaluated, has not produced sufficient change in Training Packages to address the problems above; and the ‘external validation’ of assessment project has added an extra layer of complexity to discussions around assessment which were already too complex for the average practitioner, employer or RTO to understand. Moreover, the repeated changes to the method of incorporation of employability and generic skills have diverted attention from the core business of Training Packages, which cannot be expected to compensate for educational deficiencies in individuals.

### **Relevant findings from our ‘Recognising Skill’ project**

A summary of our findings in the Training Package examination phase of our project was produced for the national consultation on February 18<sup>th</sup> and is attached to this document as an appendix. For discussion on the day, we reduced the issues to five major points.

- a. Do we need to rethink what goes into the core and the elective streams in qualifications, so that industry can expect a particular ‘product’? And if so, how?
- b. Do qualifications need to be more closely linked to occupations, e.g. ‘waiter’?
- c. Can non-technical skills be more fully identified and addressed? (This problem is compounded by the fact that in some qualifications, ‘non-technical’ skills are in fact the technical skills)
- d. Can expectations for assessment be included more explicitly?
- e. How can a Training Package qualification address and encourage good performance?

We also asked whether the nature of Training Packages might affect the take-up of qualifications in certain occupational areas, for example if the content and/or delivery of the qualifications was not

respected. (It is recognised that many other factors affect demand for qualifications from employers and learners).

### **Feedback from stakeholders**

Verbal and written feedback from the attendees indicated that they agreed with the general thrust of the analysis presented to them in relation to the Training Package comparison phase of the project.

- With relation to the need for qualifications to be more identifiably attached to occupations, one attendee suggested that this was unlikely to be feasible as there were already a large number of qualifications.
- There was support for the point that Training Packages cannot produce fully competent workers, with a comment that employers nevertheless seem to expect them to be able to do so, which breeds some discontent among employers.
- There was less support for the contention that complexity of the qualifications might discourage adoption of qualifications, with attendees suggesting other reasons for low take-up of qualifications (such as the transience of workforces in some of the occupations, the cost of studying, and lack of confidence among workers in their ability to undertake the necessary study).
- Attendees recorded challenges in articulating hidden skills that were difficult to put into words, and how to be clearer about what were 'soft' skills, as so many different terms were utilised. It was felt that some work needs to be put into 'sorting out' this area.
- Attendees thought that problems with assessment might be ameliorated if those delivering and assessing the qualifications were more fully involved in Training Package development. There was some hesitancy about more specificity in assessments because of a perceived need for flexibility.
- Attendees supported the suggestion of introducing a concept of mastery or proficiency to encourage good performance, and also suggested that descriptions in Training Packages could outline lateral career progression.
- There were no specific comments from attendees on the 'core' versus 'elective' issue, but this was certainly a major finding of our project. Some qualifications that we looked at did not contain material in core units that trained people to do the job in question.

Approval was voiced for the research project method as effective for uncovering and analysing skills in occupations, with some ISC representatives (but not all) stating that in Training Package development and reviews, they normally only had time to talk to representatives of industry, not to visit companies and talk to managers and workers.

### **Conclusions from this and other research**

#### **Nature and use of Training Packages**

While the term 'Training Packages' was perhaps not the best term at the time of their introduction, the intervening 18 years have shown that the title has enduring value. The retention of the term 'Training' is vital. It was believed, in the early days, that industry would use Training Packages quite widely for non-training purposes, and there was some evidence from our research in the early 2000s that this was happening<sup>1</sup>, albeit in minor ways. But more recent research, with Enterprise RTOs (which would be expected to be major adopters of Training Packages in non-training ways),

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<sup>1</sup> 2003 NCVET project *Enterprises' commitment to nationally recognised training for existing workers*.

indicates that Training Packages' use is primarily confined to training<sup>2</sup>. Given this situation, it is not, in fact, correct to argue, as the Discussion Paper does, (and as is often said) that Training Packages are 'not curriculum'. They do form an integral part of curriculum for the VET sector and that is in fact their main function. Reference to curriculum theory<sup>3</sup> makes it clear that the 'content' of Training Packages alone constitutes curriculum. Once this is accepted, the arguments for including more emphasis and prescription on training delivery and assessment become more powerful. Such developments were blocked in former years because of a 'pure' view of competency-based training (which used to hold that it did not matter how people developed their competence) which has led to a great deal of confusion, difficulty and poor quality outcomes among RTOs, teachers and learners.

While it is argued by some that Training Packages should be viewed as occupational standards, there are other bodies and processes for industry or occupations to develop and maintain occupational standards. This is apparent in the occupations serviced by higher education, where the 'guardians' of occupational standards maintain a relationship with higher education providers, but the latter are not expected to develop the standards or to 'police' them. The same should apply to VET. In a similar way, licensing should be separated from qualifications. While the attempt to incorporate licensing into qualifications had good intentions, it has had dysfunctional outcomes and it is best left to industry bodies to manage and monitor.

### **Development and content of Training Packages**

We have previously argued<sup>4</sup> for the retention of Industry Skills Councils as the bodies best placed to develop Training Packages and as holding the relevant historical expertise. However, the system of consultation is probably too unwieldy, and its complexity and longevity may result in sectional interests prevailing because those allied to such interests are willing to devote the time to involvement. It is important however to retain the involvement of all parties – individual employers, trade unions, industry associations, and RTOs. It would also be good practice to include data from learners.

Once it is accepted that the primary use of Training Packages is for training, then some important issues can be addressed:

*Assessment:* The current practice, under 'streamlining', of separating assessment requirements' from the units of competency needs to be reversed as quickly as possible, as in fact much information needed for training delivery is now contained within the assessment requirements and could be overlooked in delivery.

*Involvement of RTOs:* Training providers need to have more, and specialised input, into the design of Training Package qualifications because they can provide insight into challenges associated with teaching and assessing the units as they exist. This is part of the normal cycle of training from design through delivery and evaluation.

*What sort of 'graduate' may we expect from a Training Package qualification?* The current 'fiction' or implication that Training Packages can deliver fully-skilled workers can be abandoned, leaving them with an important role in delivering people able to perform at a basic level when entering an occupation, or having recently entered it.

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<sup>2</sup> Current ARC-funded project on enterprise RTOs.

<sup>3</sup> For example, Print (1993).

<sup>4</sup> Submission to 'Contestability' paper.

*Currency of Training Packages:* ‘Continuous improvement’, while introduced with good intentions, has had many dysfunctional outcomes. There are many complaints from learners and RTOs that it is virtually impossible to keep up to date and that qualifications change during individual’s period of learning; and the regulatory body spends time policing this relatively minor matter. If a Training Package is viewed as a curriculum document it can be relieved of the expectation that it can be completely up to date.

*Should a Training Package be applicable to each and every workplace?* The current system encourages employers to expect that a Training Package should develop workers fully and instantly suitable for their own workplaces. This is clearly not achievable and may breed discontent among employers. Also, it encourages and even valorises the practice of narrowing the delivery of a qualification to one particular workplace context.

*Raising the level of performance:* While Training Packages are written as though they can deliver proficient performance, as we have seen above, they cannot, by their very nature as educational documents, i.e. that they are used as curriculum for people who are by their nature novices. But conversely, they also fail to identify and describe what good performance looks like. Thus they cannot contribute to improvement of productivity or performance in an occupation. This is not necessarily to argue against competency-based assessment, nor is it necessarily an argument for grading.<sup>5</sup>

Each of these six matters is explored in more detail below.

Assessment: Assessment is well-acknowledged as the Achilles heel of Australian VET. Teachers generally have idea how to assess units of competency, and indeed until very recently were not taught how to develop assessment tasks as part of their Certificate IV. It is well-acknowledged that Australian VET assessment has developed a jargon all of its own which is not readily comprehensible, and terms like ‘assessment tools’, ‘moderation’ and ‘validation’ are frequently used incorrectly. This confusion has, moreover, led to dangerously sub-optimal assessment-related provisions in the new RTO standards.

There is reference to overseas examples in the discussion document. The German system, involving employers, has grown up over decades of practice and applies only to apprenticeships. The English system includes ‘ownership’ of (some-but not all) qualifications by Awarding Bodies. However the latter bodies merely oversee and monitor assessment (not that this is not valuable) – assessment of learners is still carried out by the training provider.

Recognising Training Packages as curriculum would lead to the ability to provide more and better guidance about assessment, a removal of the pretence that assessment must guarantee a candidate able to perform instantly on the job, and the return of more curriculum items to the main section of units of competency. It would enable strict requirements about periods of workplace practice in real workplaces to be introduced (as we see in higher education for qualifications, for example, in teaching, engineering and psychology), rather than disguising them as assessment requirements. It would also enable more explicit addressing of cognitive skills.

Involvement of RTOs: While RTOs can be involved in the development and review of Training Packages they are not explicitly consulted about their experience in delivering the qualifications. RTOs may currently have some influence – and this may be dysfunctional as sometimes the

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<sup>5</sup> In fact, grading is very difficult to manage because of the pretence that qualifications reflect a proficient worker.

influence is designed to make delivery and assessment less rigorous<sup>6</sup> – but are not systematically canvassed on issues with delivery and assessment that could lead to a better qualification. This process would be relatively easy to institute.

Level of achievement: The language that is used in Training Packages typically describes a worker who is experienced and proficient at his or her job. RTOs are therefore required to use a sort of sleight of hand in judging candidates competent, as it is very unlikely that anyone having just finished a qualification (even if working concurrently) would be regarded as a proficient worker. This is certainly not the case, for example, in higher education, where ‘graduate years’ or similar periods are expected before full proficiency is achieved. Attention to the language could create considerable improvement, and more honesty in the system.

Currency and updates: At the moment, the frequent changes to Training Packages are creating chaos both in the VET system and amongst employers. Training Packages can never be completely up to date, and even if they were, currency would disappear the day after award of a qualification. Teachers can introduce newest developments into the ‘delivered’ curriculum, over and above what is in the Training Package, and ultimately employers (and learners themselves) bear responsibility for continued currency. If qualifications had an announced cycle of updates (e.g. five-yearly), everybody would know what version of a Training Package qualification a worker held, and the areas where ‘graduates’ might need extra learning.

Applicability to all contexts: Recognition of a relatively limited function for the qualification (i.e. as an educational artefact) would remove any expectation that the qualification could cover all contexts for an occupation. As with currency, teachers should address the breadth of practice in their ‘delivered’ curriculum, but the qualification should focus on what is generally expected of a beginning worker in a particular occupation. Sometimes, in attempts to be all things to all people, the qualifications do not achieve this. The core units of qualifications should be clearly identifiable of delivering a graduate who is recognised across the industry as being able to practise in the occupation.

Improvement of performance: Our research clearly showed what differentiates a good worker in an occupation from an average worker. This information should be made available to all those teaching or learning a qualification. It would also assist employers. It would be possible to develop a short statement for each qualification, and possibly each unit too, about what good performance looks like, thus creating an aspiration to achieve this level either during or after the period of learning.

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<sup>6</sup> A case in point is the Certificate IV in TAE where some RTOs lobbied successfully to retain only a minimal requirement for workplace practice.

## **In summary: Our recommendations**

In short, our recommendations are:

### Nature of Training Packages

- Acceptance that Training Packages are curriculum documents and are not occupational standards;
- Decoupling of qualifications from licensing

### Content of Training Packages

- More explicit guidance on delivery and assessment;
- An end to the implication that Training Packages deliver job proficiency;
- Inclusion of statements about (aspirational) proficient performance in qualification documents and in unit documents;
- Closer attention to what core units of competency are essential for an occupation, to meet employer expectations of what a graduate of a qualification should be able to do and know;
- A re-thinking of the inclusion of generic and foundation skills in Training Packages, possibly moving them outside Training Packages except where explicitly associated with job tasks;
- Reconstituting units of competency that have been separated into two parts in recent changes.

### Process of development and review

- Cessation of 'continuous improvement' and re-institution of cycles of Training Package reviews, say at five-year intervals;
- Inviting feedback (to Training Package reviews) from RTOs about the 'deliverability' and 'assess ability' of qualifications and units;
- Using learner data in Training Package reviews;
- Using workplace studies as part of Training Package reviews;

We would be pleased to make ourselves available to provide further evidence to VET Reform personnel on this matter. I can be contacted, for this purpose, or to provide further information, on 03-5327 9665 or at [e.smith@federation.edu.au](mailto:e.smith@federation.edu.au)



Professor Erica Smith

On behalf of the research team for '*Recognising the skill in jobs traditionally considered unskilled*'.

## Appendix: Extract, Stakeholder Consultation document, ‘Recognising skill’ project, presented at national meeting 18 February 2015, Melbourne

### Phase 6 — Training Package examination

#### What we did

The purpose of the ‘Training Package examination’ was to compare the skills in that occupation that we found in our research fieldwork with the skills and knowledge that are recorded in the qualification that aligned most closely with that occupation. Our aim was to produce documents that could be useful when Training Packages were being reviewed or updated. The qualifications were selected in consultation with the ISCs as those being most appropriate for the occupations being studied, and are shown in the Table at the end of this extract.

In examining the Training Package qualifications, on advice from the Industry Skills Councils, we used the current versions rather than the draft versions (updates and reviews) that were being prepared at the time, and which are still not approved. Thus, some of our suggestions and comments may have been anticipated in the newer versions.

Prior to commencing the exercise, which was a desk activity, we consulted with relevant people from the Industry Skills Councils, and also a project research officer attended the Training Package Update information sessions for the relevant Training Packages. For the desk examination, we asked the following sets of questions of the data:

- From our interviews and case studies: What had we found in our research about the ‘technical’ and ‘non-technical’ skills that were needed in the occupation? What skills were required to perform well in the occupation? Did research participants mention any skills that were, in their view, missing from the Training Package qualification?
- Structure of the qualification: What was the structure of the qualification (e.g. cores, electives, packaging rules)? What streams or electives were most commonly delivered? What was the balance between units relating to ‘technical’ skills vs units relating to ‘non-technical’ skills?
- Comparison with our data: Did the qualification at unit level seem to recognise the skills seen in our research? Were there aspects of skill missing at unit level (and were the units core or elective) and /or within the Units of Competency? Were there skills identified by our research as being necessary to perform well in the role that were not included?

Analyses for each occupation were sent to the three relevant Industry Skills Councils. A planned exercise of consultation with industry stakeholders (many of whom had volunteered from Phase 5 industry forums) on the findings of this Phase did not take place. This was due to advice from the ISCs that industry was being required at the time (late 2014) to provide too much input into VET matters.

#### What we found

Firstly, we need to emphasise that in general our examination of the Training Package qualifications found that most of the skills we identified were covered in the qualifications, as one might expect given the wide consultation that takes place in Training Package development and review.

However, there were some issues that might be worth considering, particularly in view of the current national review of Training Packages, and these are listed below. The examples that are provided are indicative of instances across all or most of the qualifications in our study.

#### Qualification-based/structural issues

- In some cases the relative emphasis on the skills embodied in the Training Package qualification did not reflect the relative emphasis that we found in our research, and in these cases we have recorded some evidence about this in the individual Training Package examination documents.
- The presence of large numbers of electives in some qualifications, for example in the fitting and machining qualification, prevented a straightforward analysis of what skills the graduates of the qualification might possess.<sup>7</sup> In some cases this was compounded by the fact that electives were drawn from outside the Training Package. We tried to uncover more evidence about the ‘expected graduate skills’ by looking at the elective units most commonly delivered, but for a variety of reasons, this information was not available. One problem was that total numbers of people enrolled in a qualification and in units are not currently available.
- Some qualifications had different ways of allocating ‘technical’ and ‘non-technical skills (see ‘Discussion’ section for more analysis on this point) across core and elective units, making comparison and advice difficult. For example, the retail qualification had only ‘non-technical’ skills in the core. As well as making comparison difficult, this also means that the qualification contained little in the way of the ‘technical’ skills that are normally required in the occupation.
- It was hard to get a sense of what a good worker should be doing, from the qualifications. Yet the validation sessions came up with examples where the performance of a good worker was very well described. For example, a good waiter was described as ‘choreographing a dance’ which could be ‘translated’ for insertion into a unit of competency or otherwise in the Training Package; and for sewing machinists it was noted that these workers, to be good operators, needed to operate at *maximum* speed for *extended* periods of time without mishaps.

#### Unit-based issues

- ‘Non-technical’ skills were often described in the units in rather general terms, and could perhaps have more explication. e.g. ‘communication’ or ‘teamwork’. An example from hospitality, *SITHIND301*, is *Provide quality customer service, using appropriate methods and techniques to meet customer expectations of quality presentation and timeliness of delivery*. This was very general, and seemed to pass a great deal of responsibility onto the assessor to interpret what was acceptable.
- ‘Attitude’ was often found to be important in our research, but this did not surface well in the units in the qualifications. It is not impossible to describe the behaviours associated with ‘attitude’. The “Spotlight” tool we used helped to elaborate these behaviours.
- Integration of skills including issues of work flow is not consistently present in the units in the qualifications. For example, for concrete batchers *PMC552060C - Batch mix concrete* did not fully represent the range of people that the batchers interact with at different stages of the process the constant need for quality checking, and the urgency associated with the work. Similarly for guest service agents the units did not seem sufficiently to reflect the stress associated with neither reception desk work nor the need to evaluate customer behaviour.

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<sup>7</sup> It is recognised that there are very sound reasons why this might be so.

We recognise that some of the issues are related to the general nature of Training Packages and the requirements for the way in which they are written; and the nature of Training Packages is being scrutinised nationally at present.

**Table: Qualifications examined in Phase 6, 'Recognising skill' project**

<b>Occupation</b>	<b>Qualification name</b>	<b>Qualification code</b>
Cleaner	Certificate III in Cleaning Operations	CPP31011
Concrete Products Operator	Certificate III in Manufactured Mineral Products	PMC30110
Guest Services Agent	Certificate III in Hospitality	SIT30713
Retail Sales Assistant	Certificate III in Retail Operations	SIR30212
Security Officer	Certificate III in Security Operations	CPP30411
Sewing Machinist	Certificate III in Clothing Production	LMT3057
Waiter	Certificate III in Hospitality	SIT30713
Chef	Certificate III in Hospitality	SIT30713
Metal Fitter and Machinist	Certificate III in Engineering – Mechanical Trade	MEM30205