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RESEARCH - PLANNING - EVALUATION

Submission to:

Inquiry into the role of Technical and Further Education
system and its operation

by the House of Representatives Standing Committee on Education and
Employment

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Covering letter

8 April 2014

Chairperson
House of Representatives Standing Committee on Education and Employment
Parliament House, Canberra ACT

Dear Chairperson,

ADDITION TO ORIGINAL SUBMISSION

To Inquiry into the role of Technical and Further Education system and its operation

I seek your consideration of the following four articles I have prepared in early 2014 for the national tertiary education weekly journal *Campus Review*. The first three have been published and the fourth will be published this month.

The articles show the breadth of difficult issues facing policy and decision makers in VET. Many of these problems have existed for some years and have not been addressed, such as the vagueness in Training Packages about the 'duration' of VET courses, and some of these problems have been produced by the move to a 'competitive market', such as the proliferation of deceptive marketing practices, and low cost, poor quality courses, for example in the aged care and construction sectors. A summary of these 'hard basket' issues is provided in the fourth article.

The articles show that recent changes made to TAFE by state governments, and via the national partnerships agreement, are not addressing these hard issues for VET. Additionally, some of the policy changes affecting TAFE, including the introduction of a 'competitive market', have increased the number of problems for the sector.

Yours sincerely,

Dr John Mitchell

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Attachment A. ASQA lifts the lid on VET scandals, ducks hard questions

John Mitchell's 'Inside VET' column in *Campus Review*, January 2014

A report on deceptive marketing practices in VET doesn't go far enough in addressing the key structural problems behind the deceptions

A recent report on inappropriate marketing practices in the VET sector has opened the proverbial can of worms, but what will happen next? After reading the report prepared by the national VET regulator, the Australian Skills Quality Authority (ASQA), fundamental questions remain about why these deceptive marketing practices flourished in recent times and whether the report's recommendations will help eradicate such deception in the future.

Before exploring these questions, ASQA deserves praise for compiling and releasing 'Marketing and Advertising practices of Australia's registered training organisations', a report about the nature of unethical marketing practices, not least because the report shows the vast extent of the problem. As the basis of their research, ASQA interrogated the web sites of 480 relevant organisations' marketing and advertising services. Of these web sites, 420 belonged to registered training organisations (RTOs) and 59 to organisations that were not RTOs but were promoting VET services, for instance as brokers.

Startling finding

The startling, headline finding in the report was that "up to 45% of the RTOs were marketing and advertising misleading information". Interestingly, this figure of 45% is presented without the commonsense observation that it is very large number. Why the understatement? If 45% of the websites of Australian universities or schools included misleading information, one can imagine the public outcry. For level-headed people, 45% means that the VET sector's overall reputation for quality is now in jeopardy.

Another disturbing finding was that "a significant number" of organisations that are not RTOs are marketing services that may be in breach of the National Vocational Education and Training Regulator Act 2011 and/or the Australian Consumer Law and/or state and territory fair trading laws. Perhaps the possibility of legal action explains the bland way in which these organisations and their activities are discussed in the report.

Again the numbers are alarming: 55.9% (35) of these organisations did not identify the RTO with whom they have a relationship, leading to ASQA's muted comment that "the practice of organisations purporting to be brokers for an RTO, but in fact having no business relationship with the RTO, could undermine confidence in the training system, both for potential students and the providers of training". Again, this is an understatement. If this particular ASQA finding is understood by potential students and their representatives, such as international students and agents, confidence in the Australian training system will be damaged deeply, right now.

Limited research methods

The ASQA report is not only characterised by bland, bureaucratic language, but also the report lacks colour and insights because of the limited methods used in the research. Only one source of evidence was used as the main basis of the report: the “desk research” of 480 website. Surprisingly, no one was interviewed and no case studies prepared.

A second source of evidence is alluded to but not shared with readers: the specifics of 164 complaints related to marketing, as recorded by ASQA in the two years to June 2013. The reader is left wondering why anonymous quotations were not included in the report, particularly from students who have been stung by rogue practices. Why were some break-out boxes not included, directly quoting from some complainants? Perhaps such quotations would have been too confronting for the many government officials asked for their advice about the project. Hopefully the details of such customer complaints will come to light following a freedom of information request.

The most obvious source of evidence missing from the report is a selection of some snapshots or case studies of organisations that have transgressed the relevant laws and/or standards. A combination of the existing analysis of 480 websites and some illustrative case studies would have provided a more compelling and definitive report. Why were some code-named case studies not prepared?

ASQA deserves acknowledgement for consulting with industry training councils about the nature of the problems in the sector around advertising and marketing. However, the passionate comments of the councils, as summarised in an Appendix, are not reflected in the body of the report, although most of their concerns are picked up in the recommendations. The report could have been enriched by a profile of inappropriate marketing practices by RTOs and ‘brokers’ in at least one industry.

Why did this mess happen?

Another major omission in the ASQA “strategic review” is a “situation analysis” which inevitably would have generated the awkward but crucial question about why was misleading marketing used by nearly half of the sample of RTOs investigated, without the RTOs being reined in by regulators. One could expect the answers will be uncomfortable for all governments, based on the research I undertook for 22 articles I prepared for *Campus Review* in the 12 months from October 2011.

The set of articles found that so-called ‘VET reform’, as endorsed by COAG and championed first by Victoria, was based on three pillars, each of which were unsteady over that period:

- ‘market design’, that is the proposition that an effective market for vocational education and training (VET) can be designed and implemented by government officials, while still meeting industry skill needs
- ‘student entitlement’, that is providing eligible students with access to a subsidised training place of their own choice, with an approved training organisation
- ‘contestable funding’, that is opening up to tender more and more of the public funds for training, so that TAFE and private registered training providers compete for those public funds.

The articles showed that, over the year from October 2011, VET reform based on these ideological

pillars “remained elusive, as VET reform requires some foundational elements not yet in place, including well-informed consumers, well-resourced regulators and barriers to profiteering providers”.

Four of the 22 articles involved interviews with University of Sydney honorary senior research fellow and political economist Dr Philip Toner, who noted that “VET supplies a very unusual product in terms of objective assessment of what’s being bought,” making it difficult for many consumers to know what they are buying or what is its level of quality. Not like buying a potato.

In his own research, Toner had examined in detail some industries where such distinguishing features of the VET product were abused by dishonest service providers, for instance in the training associated with the licensing of building inspectors. This was the subject of an inquiry by the Independent Commission Against Corruption in NSW and the training providers were found to be “rotting the system, either providing no training whatsoever or just minimal training”.

As a result of his specialist research, Toner was concerned by “one of the developments seen as a positive by the Victorian government, the doubling in the number of private providers since 2008. Does the customer, let alone the government, have any idea what quality of VET product is provided by every one of these providers, asks Toner?”

Put bluntly, the set of articles from October 2011-October 2012, and articles by other independent researchers in the VET sector, show that the proliferation of unscrupulous RTOs using misleading marketing was predictable and avoidable because “VET reform” was ill-thought out, rushed and botched. Regrettably, ASQA’s report omits reference to this well documented context of policy failure.

Recommendations at risk

Instead of acknowledging the contribution of poor public policy and inadequate regulation to the fiasco of 45% of the sample of RTOs using deceptive marketing practices, ASQA’s report targets the shonky providers as the main cause of the problem. This enables ASQA to provide a set of recommendations that focus on the villains, dodgy RTOs, and the solution, improved standards and regulation. While ASQA’s recommendations avoid addressing the inconvenient contribution of poor policy to the mess, its recommendations are worthy of broad support

On balance, ASQA deserves plaudits for capturing in its recommendations a long list of issues that have spun off their investigation of marketing practices, such as the contentious issue of clarifying “the volume of learning” for different AQF qualifications. However, ASQA suggests that the National Skills Standards Council convene a group to address these urgent issues. Unfortunately, confidence in the NSSC being able to move quickly was dented by the slow process it used in recent years for implementing improved national standards.

Unless the NSSC moves quickly, more dodgy providers will use misleading information and more consumers will be exploited. Moreover, the longer it takes for improved standards related to consumer protection to be developed and implemented effectively, the more harshly history will judge the policy makers and others who created the conditions for the abuse of VET consumers by disreputable RTOs.

View the report at www.asqa.gov.au

Attachment B. Web of Deceit

John Mitchell's 'Inside VET' column in *Campus Review*, February 2014

A damning ASQA report raises questions about online courses and the contribution of market-based policies to consumer exploitation. By John Mitchell

If online learning is poor quality in one industry, is it poor quality in every other industry? This question about the quality of online learning in VET arises from the recent expose of poor practices in the niche field of training people so they can acquire their white cards to work on building sites. A white card is required by people who want to work on a construction site in Australia and it is mandatory training.

The report on training for white cards was prepared by the national VET regulator, the Australian Skills Quality Authority (ASQA), in response to concerns raised by stakeholders about the quality of training and assessment in this field. In particular, concerns were expressed that new entrants to the construction industry were not receiving the necessary work health and safety skills through white card training.

The stakeholders who drove this ASQA study were particularly concerned that the poor quality training for white cards was not meeting the learning needs of people with language and literacy issues.

Almost all Australians would support a focus on skills for work health and safety, alerted a few years ago by the deaths of new workers during the controversial 'pink batts' insulation program. In its recent report, ASQA noted that, in the three years from 2008-2011, "there were 123 fatalities in the construction industry workforce. In the period 2010-11 there were 112,570 claims for serious injury or illness involving construction industry workers".

In focusing on training for the white card, ASQA did not set out to write a report on online learning and its damning findings about online learning providers were a by-product of its research. Its main aim was to address stakeholder concerns about the quality of training and the online learning issue emerged as a result of its study of this niche field.

30 minutes training not six hours

ASQA deserves commendation for its thorough examination of the field of training for the white card. Following extensive consultations with stakeholders, a survey was conducted of 851 registered training organisations (RTOs) of whom 456 delivered the relevant training package unit that enables people to receive the white card. ASQA then audited 47 RTOs specifically for this review of white card training and a further 16 relevant RTOs were audited as part of ASQA's usual regulatory processes.

Of the 47 RTOs sampled for audit, 12 were found to deliver and assess online in relation to the white card. However, these 12 RTOs dominated the field: these 12 RTOs using online learning delivered 95% of the total 127,392 white card programs delivered by the whole sample of 47 RTOs.

The industry skills council in the construction industry recommends that white card training be for six hours, but the ASQA research initially found that of all the RTOs using online delivery, 100% had training and assessment strategies with a duration of four hours or less. Four hours not six. However, more detailed evidence sighted at the audits showed that “most people doing their white card training in the online method were found to complete their training and assessment in less than one hour”.

One hour of training, not six. No, worse than that, on closer inspection found ASQA that “some [online] delivery of the white card is taking as little as 30 minutes”. Worse still, “some RTOs provided no actual training, but provided only a knowledge test”.

Industry loses confidence

If you are a little lacking in confidence in VET after reading the above findings, you are not alone. ASQA acknowledged that “industry has lost confidence in the value of the white card as providing an assurance of safety in the workplace for new entrants to the construction industry”.

ASQA’s sample batch of 12 RTOs delivering online training for the white card is a bold bunch. Following their audits, ASQA allocated some time to all the RTOs who were non-compliant with national standards to rectify areas where they were not compliant, and as a result over two thirds became compliant. However, “all [12] registered training organisations delivering and assessing training online continued to be not compliant”.

The ASQA report noted that RTOs using face to face training methods or a mix of face to face and other flexible approaches find it hard to compete with the online providers. People attending the industry focus groups organized by ASQA reported that “RTOs that invest in resources and appropriate training and assessment are being undercut by other RTOs. Some RTOs, particularly those delivering and assessing online may be focusing on how best to reduce the cost to the student rather than ensuring the student becomes competent.”

ASQA also reported that RTOs delivering the white card through face-to-face training and assessment have advised “they cannot compete with those offering the training and assessment online”. In short, the online providers are driving out of town the honest providers and thumbing their nose at the regulators and policy makers.

The story doesn’t stop there. ASQA found that not only are training programs “delivered online too short and without time in the workplace for sufficient skill development”, no one can be sure of the identity of the person who completed the online program, raising the small issue of fraud. Using bureaucratic language, ASQA said this situation “raises quality concerns about student identification verification”.

Rogues a symptom not a cause

Where does ASQA take this story about dangerously inadequate online learning? ASQA makes many recommendations such as changes to the training packages, including tightening requirements, and developing better worded standards around assessment and clearer specifications about the

duration of training. All such recommendations are sensible, logical and necessary but ultimately insufficient.

They are insufficient because they fall short of addressing the causes of this fiasco, the conditions created by the inadequate market reform policies which mostly pre-date ASQA's arrival in mid-2011. ASQA didn't cause the problem and it can't solve it by improving regulation. Ultimately the problem is not that the rogues have taken over but that VET policy makers, inadvertently and unwittingly, have created the loopholes that allow the rogues to flourish.

For some people in business, if there is a loophole enabling them to make quick buck they will find it. These opportunistic rogues in the VET sector are not the cause of the fiasco in the training for white cards, but are a product of the inadequate policies that have spawned an artificial market for training providers in the VET sector. Those policies were rushed in, with inadequate protection for consumers and too few safeguards against disreputable providers.

Readers of this column in recent years will be familiar with the thought processes of opportunistic training providers. Here is a quick insight into how some of them think. 'Together with a few cashed-up mates, none of whom need be educators, we will create a registered training provider which only offers courses online, enabling us to maximize our profits by eliminating expensive infrastructure like classrooms and libraries. Also, we can save on teachers' salaries because the online learning programs only need to be prepared once, with very occasional updates if the training package changes. And the programs can be designed to minimize the need for active interaction between a teacher and student.'

This prospect of making a fortune with online learning is so alluring, so achievable, in a VET system which has rushed the introduction of a market for providers while expecting to control rogue providers by tweaking training package rules and polishing national training standards. Meanwhile rogue providers are having a picnic.

Review all online training in VET

The ASQA report on training for the white card accidentally raises a broad question about whether online learning is any better in every other program area in the VET sector. Based on ASQA's white card expose, an urgent strategic review is warranted of online learning across the sector, to find out how many students in other programs are being short changed. A full scale review could look more closely at and go beyond the headline issues identified by ASQA in its review of online training for the white card, such as whether any learning is required, is the duration of the training appropriate and can the identity of the student be verified.

To give credit to ASQA, its report on training for the white card is a succinct, powerful critique of poor practices in one pocket of the VET sector. Compared to its bland report on deceptive marketing practices in the sector, the white card report is a ripping yarn which only grinds to a halt when the recommendations inevitably suggest the solution is to tighten the existing rules. Get rid of all the rogues by improving the rules that haven't worked to date.

Opportunists don't care about finicky rules or standards, or safety on work sites; they care about finding loopholes and increasing their profits. To completely stamp out these rogues, we need the policy makers to go beyond tinkering with regulations and national standards. We need the decision

makers to overhaul the poorly designed market-based policies that have exposed consumers to exploitation by opportunists over the last five years.

View the report at www.asqa.gov.au

Attachment C. Training's fast track to nowhere

John Mitchell's Inside VET column for *Campus Review*, March 2014

A disturbing ASQA report on training in aged care highlights VET system flaws – shortened courses, invalid assessment and limited work placements – that the regulator must be allowed to fix

I remember very clearly making arrangements for my father to move into an aged care hostel in Adelaide in the late 1990s. I remember being inexperienced in the role and not knowing all the questions to ask. At the time, I asked the hostel director superficial questions about how many staff looked after the residents, what recreational activities were available and what was the quality of the meals provided. And at the time, in my ignorance, I took for granted that the care workers were well trained.

After reading a major report by the national VET regulator, the Australian Skills Quality Authority (ASQA), about the quality of training provided to care workers, I realise that nowadays it would be cavalier to assume the VET qualified staff in an aged care facility were well trained. Today, some basic questions that could be asked of an aged care hostel director are whether the care workers, that is the people with the standard Certificate III qualification, undertook a training program that was 200 hours in length or the recommended 1200, whether their training program involved any work experience, whether the assessment exercises they undertook were valid and whether their teachers had any current knowledge of the aged care industry.

Programs too short

Such questions about the quality of the training provided to care workers who work either in institutional or community settings were initially raised by the Productivity Commission in its 2011 report 'Caring for Older Australians'. In response to the Productivity Commission's findings about the variability of training provided to care workers, ASQA established a national strategic review of training in the aged and community care sector to examine the efficacy of the current provision of training and to advise how this training could be improved.

A major issue identified in the resultant ASQA study, 'Training for aged and community care in Australia', is that many registered training organisations (RTOs) are offering programs that are too short to ensure that people can gain all of the skills and competencies required.

"Fast-tracked minimalist courses are being used even in cases where participants have had no previous work experience or training in aged or community care," reported ASQA. "For example, it was found that up to 70% of RTOs offered the Certificate III in Aged Care in less than 1200 hours, even though the Australian Qualification Framework guidelines imply a benchmark of 1200 hours or more for Certificate III programs. A number of RTOs offered the Certificate III in less than 200 hours." Repeat: less than 200 hours instead of 1200.

Most RTOs shorten the course, found ASQA. "70% of RTOs offered the Certificate III in Aged Care over a period of less than one year, even though the Australian Qualifications Framework guidelines benchmark one to two years as being appropriate."

Programs lack work placements

A second major issue identified in the ASQA study is that the variation across RTOs in the provision of work placements in the training and assessment of aged and community care programs "was significant, but did not appear to relate to differences in client training needs".

"Most expert testament that was provided to this review and to the Productivity Commission's review, 'Caring for Older Australians', pointed out the importance of work placement and of clinical practice in the workplace context as crucial in training for caring for the aged."

In the RTOs audited by ASQA, work placement provision "ranged from under 60 hours in total by 15.0% of RTOs offering the Certificate III in Aged Care to up to two-year traineeships by some RTOs." ASQA concluded that "a clearer specification of the work placement exposure needed for aged and community care training is required".

A third major issue identified by ASQA was that most training organisations have difficulty complying with basic assessment requirements. For example, units of competence requiring at least partial assessment in the workplace were not assessed in the workplace.

Who is at fault?

In a pointed criticism of the VET decision making system, ASQA noted that the non-complying RTOs were not the only ones to blame.

'It should be stressed, while many RTOs audited in this national review are struggling with assessment, offering very different levels of work placement in their training programs (and as a result are dealing with workplace assessment very differently), and offering vastly different amounts of training to their clients, not all of these deficiencies are the fault of RTOs alone".

ASQA pointed out that "some of the national standards for the registration of RTOs are too general and ambiguous. They do not make it clear enough to RTOs what is required of them." On the other hand, ASQA hoped that the current revision of the national standards by the National Skills Standards Council "is an opportunity to rectify this".

ASQA also noted that "training packages have not always been clear enough about any mandatory requirements for training delivery, workplace exposure and assessment". While ASQA believed "much of this is being addressed in the current revision of training packages, and considered in proposals to include delivery and assessment measures in training packages, ... more needs to be done."

ASQA also pointed the finger, fairly and squarely, at the VET regulators in each jurisdiction in Australia. All but two, Victoria and Western Australia, have now handed over their powers to ASQA, but all of them deserve to take some of the blame for poor training in the fields of aged and community care: "Different regulatory approaches by the VET regulators in each state and territory prior to the establishment of ASQA have resulted in different regulatory practice in the VET sector

around Australia, which has added to the lack of clarity for RTOs about what is required of them and how they will be judged.”

ASQA rightly argued that more, not less, regulation is required to rectify this mess: “The high levels of non-compliance among RTOs offering aged and community care training will require further and on-going regulatory scrutiny.”

The pity is that ASQA, the messenger conveying the bad news, is now to be reviewed, and, according to public comments by new federal minister for vocational education and training, Ian MacFarlane, there is a growing chorus of people calling for reduced VET regulation and more self-regulation by providers. This is code for getting rid of ASQA. Given the ASQA report on aged care training, one wonders who is influencing the federal minister, as reduced regulation could lead to an even worse mess.

Short courses a VET-wide problem

ASQA’s report made the point that offering programs of short duration is a problem that goes beyond the aged care sector and threatens the foundations of VET skill development: “Although competency-based training in the Australian VET system is supposed to be about the gaining of skills and competencies, and not the serving of time in a training program, the fact that so many RTOs are offering programs of such short duration, and are also struggling with assessment, means that in many cases, people are not properly gaining all of the required skills and competencies.

“From ASQA’s experience, this is not just a problem with training in the aged and community care sector. It has much wider application across the whole VET sector. Short-duration programs are a very significant issue for training quality in the aged and community care sector, and for the quality of the Australian VET sector overall.”

ASQA underlined two key implications of short duration courses. “First is that trainees and employees are not really being properly skilled. Second is that those RTOs that are trying to provide high-quality programs that are capable of delivering the skills and competencies required in a meaningful way are being faced with unfair competition (in terms of costs and prices) from those RTOs that are providing ‘cheap’ and unrealistically short training programs.”

“This creates an environment in the competitive training market where there is a ‘race to the bottom’ in terms of continually reducing course fees to attract students, reducing course times to attract students and reducing training and delivery effort to cut costs. Quality and sufficient time to enable adequate instruction, learning and assessment are the ‘casualties’ in this environment.”

These findings by ASQA strike at the heart of the VET reform policy makers who blithely are opening up public funding to opportunistic providers, without ensuring the training delivered is of sufficient duration and quality for learning to occur. The ASQA findings are of such seriousness they should bring about a moratorium on wasting public money on poor providers, so that policy makers can find ways to place constraints on the many providers who offer cheap, short and inadequate programs.

Living in hope

Having read the ASQA report, the next time I have a detailed discussion with the director of an aged care facility I intend to ask detailed questions about which RTO trained the care workers, whether that RTO offers quick and cheap Certificate III programs and whether the RTO has struggled to meet the requirements of the audit process.

Hopefully, in the near future, these questions will be irrelevant because the training of aged care workers will have been transformed by diligent policy makers who read, understood and responded to the ASQA report in 2014.

It is of concern that the opposite will be the case in the future: that ASQA will be closed down, the same state-based regulators who allowed this fiasco to evolve will be revived, the national standards for training will be diluted and the relevant training package will remain flawed.

If the VET system cannot address the challenges set out by ASQA in its review of aged and community care training, not only will elderly patients be at risk, the prognosis for the VET system will be bleak, if not terminal.

View the report at www.asqa.gov.au

Attachment D. The too hard basket is full to overflowing

John Mitchell's 'Inside VET' draft column in *Campus Review*, to be published April 2014

Charmers in VET have very few snakes dancing to their tune

Hanging on the wall in my office is a print I purchased long ago of a Michael Leunig cartoon which depicts a character dressed up as a snake charmer, sitting cross legged on his matt and playing a flute, while a compliant snake twists away in front of him. But right behind our smug charmer is an overflowing basket containing some stiff, wooden snakes that couldn't be charmed. The note on the side of the basket simply says 'too hard basket'.

A cartoon says different things to us, at different times in our lives. I had always taken Leunig's cartoon to be a reminder not to kid myself by only working on the simple tasks and ignoring the challenging ones. However, in recent times I have begun to associate this cartoon with developments in VET, where decision makers have ignored the hard issues and congratulated themselves, regularly and most generously, for working on the easy ones.

Compliant and non-compliant snakes

A quick list of the compliant snakes or elements of VET that policy makers can get to dance to their tune include the TAFE system which they own, the government funding which they control and the regulators whom they direct. Note that if the policy makers own it, they try to, and can, get it to dance. For instance, some state government spokespeople who have implemented 'VET reform' promote their grand achievements in removing funding from TAFE to help them become more competitive, pouring funds into a bold new market for VET providers and giving consumers much more choice about who they train with, while, they say, simultaneously cracking down on rogue providers.

On first hearing it, this narrative could mesmerise some listeners, but only if there is no mention of the many items in the too hard basket and how they got there.

An initial list of the elements of VET that are in the too hard basket include issues cited in recent reports by the national regulator, the Australian Skills Quality Authority (ASQA). These include the deceptive marketing practices of many providers, the incentives for providers in the era of a VET market to offer lowest price training, the lack of protection for VET students in this market while many of whom are vulnerable to exploitation, the low quality of online learning even in life-threatening subjects like safety on building sites, the paucity of training conducted in industry settings by some cut-price providers, the lack of industry knowledge of some teaching staff, the inadequate assessment practices in many providers and the difference in the duration of VET courses offered by different providers for the one qualification. Other snakes identified in the ASQA reports include the flaws in training packages and the need to update national quality standards.

The too hard basket has many other stiff snakes which decision makers have failed to charm, which the ASQA reports may have hinted at but not headlined. These include the issue that teaching is a profession, whether it is a pre-school, school, VET or higher education level, and this profession

requires high level skills in VET, particularly if students have learning, literacy or numeracy challenges or other learning difficulties or negative experiences at school.

Another stiff snake or difficult issue in VET is that the same people who teach a course assess it. This is an awkward issue when the provider is receiving government funding and is found by the government auditor to be not reaching the national standards set for providers. University staff are used to the same people teaching a course assessing it, but a key difference between a university and a VET provider is that a university has a rigorous, scrupulous academic board. In VET, a person with no educational qualifications but a keen eye for a quick buck and the wit to satisfy the registration bodies, can own and run a registered training organisation, without any semblance of an academic board.

Scandals from aged to child care

In the last issue of *Campus Review*, this column examined the recent report by ASQA on hard basket issues in aged and community care training. According to its website, ASQA now has embarked on the first of three new audits of other areas within the VET sector, a review of early childhood education and care training. ASQA will commence work on its two other strategic reviews for 2014 – equine and security training – later this year.

The management committee overseeing the review of early childhood education and care training has been appointed and comprises representatives from the Department of Education, Department of Industry, Family Day Care Australia, Victorian Registration and Qualification Authority, Department of Education Services WA, Community Services & Health ISC, Australian Children's Education and Care Quality Authority, Early Childhood Australia, United Voice and Australian Community Children's Services.

These stakeholders will bring to the management committee deep understanding of the hard basket issues in early childhood education. A challenge facing these stakeholders is to put aside any embarrassment which the strategic review might cause their organisations and to suggest ways those tough issues can be tackled and solved.

ASQA is currently undertaking audits of randomly selected training providers to inform the early childhood education review, as well as undertaking other research. If the methodologies used in the aged care review are replicated in the early childhood review, the new review will include data from standard ASQA audits and possibly targeted surveys. While the research approaches used in the aged care review were effective in identifying a raft of issues, the aged care report would have had twice the impact if it had included evidence from code-named case studies.

While we wait to see whether the strategic audit of early childhood education unearths more scandals than the aged care audit, some experienced practitioners who have contacted me are predicting that the early childhood education review report will be "a mirror image" of the aged care report. One such VET practitioner who is involved in the field of early childhood education and who preferred to remain anonymous, predicted that "in fact, you could just change the names of the programs and the reports could be the same".

The same practitioner pointed to a major scandal revealed in the aged care review, about the duration of training programs varying dramatically from one provider to another. Some training providers in the aged care sector are offering in less than 200 hours what other providers are offering in 1,200 hours. To make his point about child care having the same scandal as aged care about the duration of courses, he sent me some tables from the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS).

This is the list of providers who cater for international students, so these providers are the flag wavers in an industry valued at billions; an industry that is a crucial contributor to the national economy.

My contact noted that a simple web search on the government website, as described below, quickly reveals the providers that have been granted CRICOS registration for the CHC30113 certificate III in early childhood education and care, and the length of the courses they provide for the certificate, "with the shortest being 23 weeks and the longest being 39 weeks". That is, a difference of 16 weeks between the shortest and longest courses.

He then directed my attention to the table for the diploma course, drawn from the CRICOS site, where the variation in the duration of programs is even more dramatic. "For the CHC50113 Diploma of Early Childhood Education and Care, the shortest [offering by a provider] is 38 weeks and the longest is 106 weeks." A difference of 68 weeks.

He added that "as I am sure you can imagine, the range of these 'durations' will also impact on the time spent [by students] in industry placements prior to assessment – again, this will be the same [finding as the ASQA report on aged care scandals]".

He emphasised that his training organisation was doing all it could to offer courses of appropriate length and quality in early childhood education: "From our perspective I believe we are doing everything right and have durations [of our programs] and time [for students] in [industry] placements that are meeting both industry expectations and ensuring we are educating and graduating quality students."

However, in a VET industry with so little regulation of and specificity about course length and with so many examples of deceptive marketing, an unsuspecting international student might be tempted by the shorter study time offered by the slick competitors of my contact's organisation.

Challengers for the charm school

Sometime later in 2014, if ASQA still exists and the early childhood education report is completed and released, what will the snake charmers do with another major report like the aged care expose? Will they turn around and look at the hard basket issues in child care training like variations in the duration of courses, inadequate assessment practices and insufficient training in industry settings? Or will they turn their backs on the hard issues and return to charming the snakes they can make dance to their tune?

If they do turn their backs on the hard issues, the quality of training for early childhood education will suffer, to the long-term detriment of the newest generation of young Australians.

See the list of providers and the variations in course duration in early childhood education at <http://cricos.deewr.gov.au/Course/CourseSearch.aspx> Under 'Course Search' in the field 'Course Name', enter either CHC30113 or CHC50113 and make no other selections.