



## Service Skills Australia

### Response to the Inquiry into the Welfare of International Students

#### I. An overview of Service Skills Australia (SSA)

Service Skills Australia is a not-for-profit, independent organisation which is one of 11 Industry Skills Councils funded by the Australian Government Department of Education, Employment and Workplace Relations (DEEWR) to support skills development for our industries. We consult and engage with industry, training organisations, government and other stakeholders to develop and support the implementation of nationally recognised training products that respond to industry skill needs.

SSA represents the interests of 640,000 Service businesses across the following sectors: retail, wholesale, sport, fitness, community recreation, outdoor recreation, travel, tours, meetings and events, accommodation, restaurants and catering, caravans, hairdressing beauty, floristry, community pharmacy and funeral services.

As an Industry Skills Council, SSA supports skills development for our industries by:

- Providing industry intelligence and advice to Skills Australia, government and enterprises on workforce development and skills needs;
- Actively supporting the development, implementation and continuous improvement of high quality training and workforce development products and services, including training packages. SSA currently manages a total of 10 industry training packages;
- Providing independent skills and training advice to enterprises, including matching identified training needs with appropriate training solutions; and
- Working with enterprises, employment service providers, training providers and government to allocate training places.

Within the Services industries training sector, there are a number of providers in the international markets, particularly in areas which have been identified either now or in the past as skill shortage occupations, for example hairdressing and cookery.

Our industry has had concerns over the quality of some of these providers and we welcome the opportunity to contribute to this senate enquiry.

Our focus is on the quality of training and education, and to a lesser extent the impact on the tourist market. We are not in a position to comment on aspects which relate to students' broader welfare such as safety, accommodation and pastoral care, except in the event that the experience of poor quality training impacts on a student's sense of well being and self efficacy.



## 2. Issues of quality training and assessment

SSA is committed to the provision of high quality training and assessment as a means of creating sustainable prosperity and genuine career possibilities for employees within the Services industries.

However, industry confidence is low at the moment. There is particular disquiet about the quality of training and education for fee paying international students. We continue to receive reports of poor quality training and assessment particularly, but not exclusively, in the international market.

### 2.1 Training Packages and quality

In order to understand the issues which impact on quality training and assessment and the auditing process it is important to appreciate the role of industry training packages. The training package for a particular industry sector is the framework for training and assessment. It represents a bi-partite agreement between industry (employers and unions) and State and Federal Governments in relation to the competency outcomes, qualification levels and assessment requirements for Australian industry within that sector.

Specifically, training packages:

- Define work outcomes in units of competence – in doing that they describe underpinning knowledge and skills to perform a defined task and the contextual range in which the work/task occurs;
- Describe a set of work tasks for an agreed job role as a qualification;
- Describe the environment of assessment (assessment guidelines);
- Provide advice on the skills required by trainers and assessor;
- Describe the context for assessment and possible resources.

Training packages describe the competency outcomes of training in terms of a work environment. They set the standards for training against which the students are assessed. They do not describe the inputs, as in curriculum, nor do they dictate teaching styles or the texts, manuals and workbooks students should use.

However in response to concerns about the quality of providers, training packages have become more prescriptive in relation to advice about how training is delivered and assessed. Increasingly they include highly specific detail about the resources and facilities required, for example, the facilities and equipment expected of a commercial kitchen or hairdressing salon. In some cases, industry has required detailed definitions, for example, of “multi-tasking” and a “commercial” business environment.



It should be emphasized that the move to include such prescription in the training packages is directly related to industry's concerns about the quality of VET provision, particularly for international students. From our industry's perspective, the training package is almost the only means available to influence the quality of the training outcomes in the VET system.

## **2.2 Training package implementation in the international market**

SSA understands that a significant number of students in fee paying colleges undertake commercial cookery and hairdressing qualifications through an institutional pathway with minimal exposure to a real workplace context.

It is becoming clear that these students are not meeting the standards detailed in the training package. More and more employers are reporting that the graduates of these programs do not have the equivalent skill depth and breadth as graduates from a program that is based in the workplace (for instance an apprenticeship). Evidence is mounting that the typical institutional delivery approach used by many colleges delivering to international students is of an inferior quality because:

- Many students do not get access to workplace training or work experience.
- Without a workplace component, the training is shorter and is inadequate for the development of employability skills relevant to real work

Moreover it would appear that the providers are not meeting the delivery requirements specified in the training package. It is often reported to SSA that training facilities do not meet the recommended standard and therefore students graduate without ever getting access to industry application at work or in training.

As a result our employers are reluctant to employ graduates from "institutional course pathways" as they are not considered to be work-ready. This significantly disadvantages international students, who in effect receive a less valuable qualification than others simply because of their choice of provider and despite a regulatory system which assures standardized quality for all recognised providers.

It is also problematic for employers and for employees who work with these graduates if they find employment. There are certain expectations in relation to a qualification which they cannot fulfill through no fault of their own but which have implications for workplace safety and for productivity. Students who experience this are often left with a poor sense of mastery, poor sense of achievement and this will necessarily affect their sense of self-worth.

## **2.3 Assessment Practice**

The question of assessment practice in the "institutional pathway" delivery is therefore of great concern to the Skills Council and industry. If these students are gaining the qualifications without gaining the skills as articulated in the industry training packages, the assessment process must not be sufficiently thorough.



The perception is that there is widespread inconsistency and poor practice in relation to assessment, for example:

- A lack of rigour in the interpretation and application of competency standards;
- Poor attention to industry expectations and requirements in the context of assessment;
- A lack of industry experience among assessors;

This combines to result in the awarding of qualifications which cannot be trusted.

## 2.4 Industry initiatives to improve quality

As observed earlier, while SSA represents industry's voice within the vocational education and training sector it has had limited influence in the recognition of providers beyond the training package. However, industry representatives are keen to become more involved in implementation to support the national training system and build the nation's productivity.

In response to ongoing industry concern SSA has already made improvements to the quality of our industry training packages resulting in more specific units of competence, tighter assessment guidelines, more helpful/detailed resource checklist, more detailed requirements for assessors.

Further SSA has recently implemented two innovations to provide more input into provider recognition process, which have been very well received. These are:

- The "Pink Slip" System. In NSW, the Vocational Education and Training Advisory Body, (VETAB) contracts an industry specialist to inspect RTO prior to registration to ensure that the facilities meet the industry standards. There is significant interest in this initiative from other state training authorities.
- SSA has in the development of the most recent Training Packages, produced a User Guide which specifies the:
  - minimum assessment and learning requirements to achieve qualifications,
  - required assessor/trainer qualifications and experiences above and beyond those required by regulation,
  - professional development requirements for trainers and assessors,
  - requirements around work placement and/or experience,
  - guidelines for selection and recruitment of students,
  - minimum equipment and facilities requirements for delivery,



- minimum recommended duration for delivery of units and/or qualifications.

The Services Industry is ready, willing and able to be more supportive of the national training system. Our commitment to ensuring that the skilling system is able to support productivity growth has been reiterated in a number of projects that Service Skills Australia has commissioned including:

- Tourism and Hospitality Workforce Development Strategy
- Sport and Recreation Industry Workforce Development Strategy
- A range of training package reviews including, Beauty, Sport and Recreation, Hairdressing and Beauty
- The New Deal Project – an exploration of the ways that industry can value add and support better quality outcomes in its training system

This research and the views of our industry strongly support the view that Service Skills Australia should take a more active role in the implementation of training packages as well as in their development. This would mean that industry expertise is utilised in the auditing of colleges, in providing recognition of excellence and in providing information to training providers and to potential students and employers. It is our strong belief that this would result in greater consistency and improved quality of training within the sector for both international and domestic markets.

## 2.5 Permanent Residency

Whilst SSA is not in a position to comment on immigration policy, to the extent that it impacts of skills policy we would like to highlight that in our experience, the real goal of many international students who study in Australia is permanent residency (as opposed to achieving a qualification). The qualification is a pathway to “PR”. Notwithstanding the skill shortages reported in some of our industries (hairdressing and commercial cookery) it is important to consider that in spite of the significant increase in commercial cookery and hairdressing student, these industries are still reporting skill shortages.

SSA strongly supports education and training policy and audit frameworks that are based upon the reality of student’s experience and that the international student is looking for gainful employment in Australia or overseas. To that extent, training (and the audit frameworks that support quality outcomes) need to be cognocent of assessment process that support employment outcomes.

**We recommend that the auditing and quality processes be made more effective and effectual through a more active industry role including the use of industry advisors.**

**We also recommend that regardless of the purpose of training (for permanent residency or otherwise) that the quality of training that the international student receives is sufficient for the student to gain employment in Australia or overseas.**



### 3. Impact on tourism market

Poor quality training and education programs can adversely impact on our tourism market. Education programs targeting the international market must provide quality outcomes both in education and the overall experience otherwise it is damaging to Australia's international tourism brand.

Many students, particularly English language students, come to Australia legitimately on short term tourism visas or working holiday visas. This is an important part of the backpacker/education tourism market. It has been reported by our industry members that people who come under these conditions have a net positive effect on the number of jobs particularly in the services sector. Should these numbers drop off due to a perception of low quality training and education programs, there will be a significant economic impact for Australia in the tourism market.

There is a legal requirement and an industry code which applies to overseas tour wholesalers, travel agents, inbound tour operators and tourism suppliers to deliver what is promised. Similar requirements should apply to the suppliers and distribution /marketing channels of education and training.

**We recommend that education and migration agents be subject to a legal and industry code to ensure accountability in the transactions in relation to education tourism.**

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