Australia: Competency Rich, Skill Poor – A Gathering of Voices

A submission to the House of Representatives inquiry into the role of Technical and Further Education system and its operation. April 2013

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However beautiful the strategy, you should occasionally look at the results.

— Winston Churchill

tE.

This submission, whilst dutifully commenting upon each of the terms of reference, holds the one clear message: the Australian VET sector is in crisis. TAFE is the heart of this sector and, due to numerous issues - of which funding is but one, its capacity to enable the development of economically relevant skills and knowledge has been seriously compromised: Compromised to the point at which qualifications derived from the sector are being viewed by industry and bearers alike with scepticism – at times outright derision.

Depicting the perceptions of trades people, employers, teachers and TAFE students, this submission sets out to describe the extent to which the VET sector generally is failing our economy. Based upon voices gathered from throughout the country, it is trustworthy evidence easily replicated by simply walking down the street and talking to any employer, be they the local restaurateur, the small builder on the nearest housing estate, or the foreperson of a large scale civic construction. It depicts a truth that, when viewed from the perspective of sustainability – be that economic, industrial, or environmental – is at best disquieting, at another level, highly disturbing.

This submission has been developed as a series of dot points that flow on immediately from this introduction. In summarising the essence of a greater body of material, this submission therefore states, and provides evidence, that:

A. The contemporary VET paradigm, commonly described as competency based training, is failing the skill and knowledge needs of our economy. *This is due to*:

• the ease by which its skill and knowledge development goals are subverted to suit the base economic targets of the delivery organisation.

... if they are breathing we will take them any time of day or night, we know they'll not pass anything but that's not the point, we need the dollars attached to their heads...

TAFE Head of Dept. to teachers

• The focus by Registered Training Organisations (RTOs) being upon the 'delivery' of qualifications, as opposed to the development of skill and knowledge.

...this is all about money now, not about developing skill, if we want to keep a job we'll just have to get used to it...

TAFE line manager to teacher

 RTOs being set up in the current framework as competitors. However, due to the RTO recognition clause, they may only compete in terms of price and course duration when marketing to prospective clientele. I.e. Qualifications are perceived by the community as something to be bought at the lowest cost of time and money – VET has entered the 'consumer' market without appropriately addressing the fundamental issue of quality.

... I was after the qualification the quickest and cheapest way that I could so I could get my business up and running ASAP... ...I knew I'd learn more at TAFE but it would just take too long...

Builder rationalising why he went with a Private RTO over TAFE

• The marketed proposition that in completing a given unit, or cluster of units, of training, that the applicant (student, apprentice, trainee, worker) is proficient in the skills and knowledge so described. This, irrespective of who does the training, where it is conducted, the time taken, or the contextual experience base available to the student in which to develop that skill and knowledge. This is one of the elements leading to employers being disenchanted with VET outcomes and their perception that VET qualifications are a false indication of performance. Another is the lack of trust in the assessment of competency by TAFEs and private RTOs jointly.

... I'm not taking on any more apprentices for a while, TAFE just passes them whether they can do something or not... ... it's become a farce...

Hunter Valley Builder

• The denial that skill and knowledge takes time to develop, and that this development will only fully evolve in context. This denial is exemplified in the Victorian model of competency completion for trades.

...why couldn't someone pass everything in a certificate three course in a few months? If they're smart enough then they should be passed and qualified for the trade. Why not?...

Academic researcher promoting competency completions

• A false relationship between employers and RTOs with regards to competency sign off. There are systems in place that require employers to sign off on competencies achieved by students before the final award of those units. This is a false relationship due to various factors: firstly that employers often sign despite never having seen the applicant perform the tasks listed; secondly, employers sometimes sign as they need their employee to hold the competency for their companies insurances or other self interest factors; alternatively, they simply sign out of ignorance or a desire to get what they consider to be irrelevant paperwork out of the way. Seldom, if ever, do they sign with clear evidence of satisfactory performance in all elements of a given competency.

...We don't do half of the stuff listed here... ...he's a good kid though so if you need me to sign I'll sign and we'll go from there 'ay?...

Riverina Builder to TAFE teacher

A false relationship between employers and RTOs with regards to training. Employers are frequently encouraged to take the option of workplace delivered qualifications. In the construction industry particularly employers take on this role as a means of reducing lost time through TAFE attendance. In addition it is a cheap delivery option for RTOs (TAFE or private). In reality however employers seldom do any training focused around the elements of a given competency. Nor have they been provided with any form of training themselves in mentoring, training, or skill and knowledge development at any level. No unit is provided on mentoring or employee training in any of the courses they are likely to have covered in becoming an employer (be it trade training, or post-trade business or contractor licence focused courses). They are simply left to their own devices. TAFEs (and private RTOs) have extremely limited time to visit apprentices on site, with workplace delivery being frequently reduced to fewer than 10 hrs total contact time in any twelve month period.

...I wouldn't have a clue how to train a kid on all this stuff... ...isn't that what I pay the lad's TAFE fees for?...

Regional employer rejecting a workplace delivery proposal

• Course material being developed with a narrow focus upon elements of competency rather than holistically addressing contextualised skilful performance. This may be described as 'digitalised' text over analogue text. It is a series of 'dots' depicting the line of requisite skill and knowledge that miss the often vitally important and harder to capture areas that are the 'art' of making in any field of human endeavour.

... These books are ok, but they miss half the important stuff to my mind, but I guess that's what I'm here for...

TAFE teacher lamenting the quality of available resources

• There is a clear and evident disparity between the level of skill and knowledge developed when engaging the same competencies through different course delivery mechanisms. Example the certificate 2 in Construction:

School delivered (VET in Schools) – limited contextualisation through ten days of workplace experience (frequently taught by teachers without a trade background)

TAFE delivered school VET (TVET) - limited contextualisation through ten days of workplace experience, but arguably advantaged to some degree by trade experienced, and trade training focused, teachers.

School based apprentices – limited contextual experience base through one day/week working with an employer. Off-site training of half a day/week may be delivered by the school or another RTO (e.g. TAFE).

TAFE Pre-apprenticeship courses – Six months full time (3 days/week) under instruction from experienced trades people

A first year apprentice or trainee undertaking on-line delivery – One year full time on site working for a builder supported by theory materials addressed on-line. Generally limited personal interaction with RTO trainers.

A first year apprentice or trainee undergoing workplace delivery - One year full time on site working for a builder with limited on-site personal interaction with facilitators from an RTO. Support materials may be hard copy or on-line.

A first year apprentice or trainee attending TAFE - One year full time on site working for a builder plus one day per week (or equivalent hours in full week block release) TAFE attendance.

The disparity in skill and knowledge development by individuals undertaking these courses is self evident. Apprentices having significantly greater time in context, backed by personal interaction with trainers experienced in the given field of human endeavour, will develop their skills to a higher level. They simply have more time in which to explore and hone their skills. When plotted on a basic bar chart, this disparity in development may look akin to that shown below:



Unfortunately the 'system' requires that, as each of these students, apprentices or trainees have been assessed on the same competency, they are deemed to be equivalent. The reality: any apprentice, after 12 months with the responsibilities of working for a wage, for a builder, and on

real homes for which a client is paying, is going to be more proficient and knowledgeable than someone that has spent ten days on a site and sat in a class room. Even the students acknowledge that.

...I can't believe that I'm supposed to be able to do what he can... ...I've only been at TAFE for six months, he's been working all year on houses... ...and with a really good builder too... that's not really fair "

Pre-apprentice pointing out the obvious to his TAFE teacher

...He may have done his first year stuff at school or wherever, but I've spoken to both his parents and the young bloke himself and we want him to start from day one again... I'm not paying second year wages when he really doesn't know sh*# from clay – he says so himself...

Builder to TAFE teacher on his new apprentice

 Contemporary auditing procedures tending to promote segmented competency delivery over holistic assessment of multiple units. This separation between skill development and assessment is an anathema to well trained and experienced VET practitioners be they TAFE or private providers. It tends to disallow the legitimate use of subjective observation and judgement which is the heart of all skilful practice, be it teaching, lecturing, or welding two bits of metal.

...We just sort of fudge it a bit to be honest... ...it's the only way to cover all the elements (of a competency) and yet get any sort of real picture of what the student can actually do... ...we have to risk manage that approach with respect to the audit mob though...

Melbourne TAFE teacher discussing their assessment approach

- B. TAFE, and RTOs generally, and the current VET paradigm, are inappropriately framed within the economy to address the genuine developmental and employment enhancement needs of many Australians. *This is due to*:
 - Courses being developed around perceived market share and economy of scale. Courses may be deemed successful and regionally relevant because they are always full. This, despite the reality that they are full because there is no other course available and the student has to attend 'something' in order to receive Centrelink payments.

... sorry, I should have explained......I'm not doing this course (office secretarial) because I think it will get me a job or anything. I'm doing it because it's the only course available and I need to doing something to get the Centrelink payments... I really want to be a Vet.....I can't afford to leave home at the moment.

TAFE student in outer NSW regional town

• Funding, and contemporary funding models, restrain the potential to develop and provide adaptive work readiness programs for disadvantage and marginalised individuals and communities. This is due in the main to the need to provide industry aligned 'competencies', rather than VET readiness needs as the forerunner to any industry relevant training.

...our PA (pre-apprenticeship) students are mostly just here for the centrelink payments... ...we battle just to get the head phones out of their ears let alone focus on anything to do with the course... ...the last lot we didn't even try to put them through power tool training, just too dangerous... ...drugs, alcohol, broken homes, ADHD, give it any name you like, but their not ready for this course... ...its just setting them up for failure, as if they haven't had enough of that already...

Riverina TAFE teacher struggling with the perceived inadequacy of the contemporary pre-apprenticeship program

Reduced organisational flexibility through top heavy managerial structures, significantly increased audit demands, and, despite the prior, and due the latter, increased administration loads on delivery staff. Despite the drive for sustainability, some elements of any economy will always be ephemeral (mining being the obvious example). RTOs are 'popping up' anywhere a hole is being dug to 'cash in'. It will be necessary for TAFE to take the role of retraining workers as this boom closes. In such cases the development and delivery of a broad range of adaptive programs will need to be swiftly implemented.

...we keep getting more and more managers and fewer teachers and support staff, yet they say we are low on funds... ... why pay for more high waged managers when it's the teachers and students that are the purpose of the organisation?

TAFE teacher lamenting the introduction of another layer of management between himself and the head of faculty.

• A failure to address the individual's fundamental developmental requirement for sustainability. From any perspective, sustainability requires a sense of responsible citizenship to be held by the general population. Education and training should lead to improved understanding of, and capacity for, this citizenship. Contemporary VET fails spectacularly to deliver on this score as its focus is upon the economically rationalised delivery of the qualification, rather than the skill and knowledge developmental requirements of that qualification. Likewise the contemporary VET paradigm has effectively indoctrinated 'consumers' into this same perspective, I.e. how to get the qualification as quickly and cheaply as possible. Online delivery is becoming the eBay of VET and offshore online delivery is already here. ...Look mate, no disrespect, but I'm trying to set up a business.....I'm only doing this bullsh*# because I have to get a licence.....you'll find the rest of the blokes are the same. We're not here for anything but the bit of paper...

Tradesperson seeking to complete a Certificate IV for licensing purposes.

The focus on the delivery of industry aligned units of competency framed with relevance towards qualifications rather than community needs. This impinges upon the VET sector's capacity to develop adaptive community relevant indigenous programs. Likewise it applies to the needs of disadvantaged youth in cities and towns. As with the pre-apprentices outlined earlier, these youth frequently need skills on how to engage with learning, engage with authority, and how to deal with issues of developmental trauma. This before attempting any level of trade training. The VET sector needs to be funded for this form of 'engagement' or work readiness training rather than what are to the students, pointless qualifications that they are likely never to obtain. In the case of indigenous communities, gualifications framed around skills they don't want instead of those their community need (often of mixed bag of competencies from across a range of training packages).

...what countrymen really need is a maintenance style course, a bit of electrical, a bit of plumbing, how to fix a door, a diesel generator, pump or small motor... we don't really need a full building, plumbing or electrical course, just some basics so we can fix things instead of paying heaps to get some white bloke dropped in by helicopter to fix split plastic water pipe... ...their just making money out of us...

Indigenous TAFE teacher operating out of Alice Springs

• A failure to acknowledge the import of art aligned skills and knowledge to base line, and high end, industry relevant roles. The arts have been the road into training for many Australians over the years and remains so. Some will go on to make profitable small business, others will move onto trade, business, or university qualifications ostensibly not aligned with art. However, the knowledge and skills they develop in VET art courses, particularly those at TAFE are of significant value to many vocations. Reducing access to these course is a flawed approach to community capacity and capability development.

...I was cleaning toilets after dropping out of Uni' when I did an ceramics course at TAFE... ...the TAFE teacher put me on to a lab technicians course because I'd shown a strong aptitude for the chemistry side of glazing... ...with that I got a job at a marine science lab which gave me the confidence to go back to Uni...

Pharmaceutical research chemist, now with a PhD and several patents to his name.

C. Access to relevant skill and knowledge development as a pathway to employment is complex, with increasingly varying needs of regions, communities and disadvantaged individuals. Employment pathways are also not the full picture, community needs are not frequently about capability, capacity, and citizenship; recovery and rehabilitation. TAFE's ability to facilitate this form skill and knowledge development has become increasingly marginal.

This is due to:

• Ongoing cross-border anomalies in funding models and the relevance of these funding models to the clientele concerned. I.e. the funding models focus upon competency sets that frequently have limited relevance to the real needs of communities and individuals.

...Yes we know that that's what they may need or want, but this is the course we have funding for so that's what we deliver...

TAFE section manager to staff debating the value of a pre-apprenticeship course to disenfranchised youth

• The fact that within the one regional area highly diverse course structures may need to be developed in order to meet apparently the same goals. Regional areas serviced by the one TAFE frequently hold 'big town folk', 'townies', and farmers, as well as indigenous communities that may be outlying or with individuals or groups fitting in with the previous descriptions. Each of these groups may have vastly differing needs with regards to delivery modes, access and support.

...My parents live on a farm.....its about an hour and a bit away which I drive myself.....I go home there every weekend to help out and help mum in the café... I also work at a supermarket and with a caterers here which is what I really want to do.....I've done heaps of different things, worked unpaid, change directions....I still cant' seem to get a job.....I'm still in there trying though hey...

Female hospitality student in regional NSW

• Access to training remains compromised by distance despite recent technological advances. Many students prefer a strong face to face element, whilst some fields of study demand such training due simply the type of work undertaken. Separation from study locations by 'unserviced' distance being of more significance than the time it may take to travel those distances.

...a couple of your students will be late today, they've had to drive nigh on 300 clicks to get here due to the rain...

Head of dept to TAFE teacher

...I reckon I'll take an extra spare with me next week, I went through two tyres just getting out there this time...

Indigenous TAFE teacher operating out of Alice Springs

• Poor research into regional needs: Uptake of courses may not reflect actual needs or hold relevance to regional employment pathways; rather, it may simply reflect the availability of courses and the need/desire to do 'something'.

... I find it funny that they run this office secretarial course out here and nothing much else... ... not much call for it in a town like this... ... still its something and I'll use some of it somehow, and it means I can get centrelink payments

TAFE student in outer NSW regional town

• Recent drives to reduce the presence of the arts in VET. The arts have increasing rather than decreasing relevance in community capability development as well as base line skill development for large design, and marketing and entertainment enterprises. In addition they play a significant disaster recovery role through community stress release and expression.

"...we come out here and engage with the community to help them express themselves and their experiences, help them to get past the trauma... ...sometimes the result might be some art works which we promote, sometimes a festival... ...songs... dance... photography... ...we try not to dictate so we don't really say 'we're artists', ... we say we're community capacity builders, that gets them laughing straight away... "

Artists from TAFE and University aiding in disaster recovery, Gascoyne River region central WA.

• The 'entitlement' or 'resource allocation' model of funding giving youth one chance only access to affordable VET training. After this students will have to pay full fees leaving many, economically disadvantaged or not, incapable of affording training.

...Its going to cost how much?!... ... good thing I did it this year then...

Pre-apprentice student on his second time attempting to complete his course

• Retraining and 'second chance' training being placed outside the reach of many who have been retrenched or the unemployed with outdated qualifications. Again this is a result of 'entitlement' funding models such as have been imposed in both Victoria and NSW.

...I don't reckon you'll have a course to deliver... ...no one I know could afford to do it at that price...

Tradesperson completing a Certificate IV in construction

• The over focus upon industry aligned competencies and qualifications disallowing the framing of courses for rehabilitation and recovery. People who have suffered trauma, be it natural or man made disasters, or medical such as cancer, need to rebuilt their sense of capacity and capability before being able to effectively re-enter the workforce. TAFE has previously been able to run highly successful recovery programs through 'access' funding and the quiet 'fudging' competency sets. The more stringent funding

models of Victoria and NSW are making these important and for many, life changing, programs unachievable.

... The idea of building a dragon boat represented Hope to me, that maybe if I could do this.....I might just be OK.

Little did I know that the project would give me my life back, but only better...

Participant in the Brave Heart Dragon Boat project, Riverina NSW

• Loss of passion. Passionate teachers are requisite to delivery in remote areas, indigenous groups, and youth generally. Teachers who are not given the time to develop appropriate delivery strategies due to increasing non teaching workloads face burnout and the passion dies. Movement and humour quickly dies when passion fails, and quality delivery dies with them.

...if you want to keep these guys on track you have to talk and move fast... ...think of the stand up comedian and you've just about got it... ...if you haven't made your point and got them doing something inside of ten minutes then you've lost them...

> TAFE teacher talking of his experiences with both indigenous and non indigenous disadvantaged youth

D. The operation of a competitive training market is not yet delivering on the key criteria of quality or indeed cost effectiveness. *This is due to:*

 A significant lack of belief and or trust in VET qualifications generally by all sectors of industry. In part this is the perception, rightly or wrongly, by industry that when a graduate's certificate states that an individual is 'competent' in any given task, that they can actually do that task independently and proficiently. The reality being something much less, and it being clear that duration of training and the resources for that training are diminishing, industry is on mass rejecting qualifications as a means of discerning amongst prospective employees.

...We're sick of having so called trades people front up with bits of paper listing all the things they can do, only to find they can't do any of it...

Senior manager of a large construction company in Albury Wodonga

 TAFEs competing with TAFEs for market share. This has led to significant resource duplication at the expense of the public purse. This is particularly the case with cross border communities such as Albury Wodonga, and mining boom hubs such as Darwin in the Northern Territory. TAFE's, as well as private RTO's have target Darwin particularly as a potential source of commercial income. Quality control remaining a key issue with competing RTOs, be they TAFEs or otherwise, despite the advent of ASQA. With skill and knowledge development, the 'market' is generally not in a position to determine what constitutes quality until after the fact. From the youth training perspective this can lead to students 'wasting' their one-off funding allocation on well marketed but ostensibly hollow training programs.

...I came down here with my boyfriend because we both felt we were not getting proper training... it all sounded good (on-line delivery) because it was so easy, but having worked down here and gone to TAFE we realise that we have sort of wasted a couple of years.....we've got a lot of catching up to do...

Female hair dressing apprentice commenting on her experiences with a large Qld on-line provider

Online delivery's capacity to cross all boarders. Again this has lead to
massive amounts of wasted public funds on continual resource duplication
without any form of quality assurance. Individual institutes within NSW can
find themselves generating effectively the same resource material, in order
to compete for students in each other's region, as well as those from
Western Australia or indeed any state in the country. Two factors constantly
come up when prospective students are questioned about determinants of
choice: cost, and how much work is needed to get the qualification – the
lesser the better.

...I can do my white card on-line for \$60 and about two hours work... ...you want me to pay \$150 and spend all day at it... ...why would I do that?

First year apprentice to NSW TAFE teacher regarding Construction Induction training

• The proliferation of for-profit providers in a poorly regulated environment. With the focus upon cost effective 'delivery' over skill and knowledge development, by both RTOs and 'consumers', the drive has been steadily downwards on the quality of VET graduates. Course duration is being constantly reduced, whilst contemporary funding models increase the pressure for greater class sizes.

...I'm forced into a position where I'm demanding that my teachers deliver competences like roofing or wall framing with less hours but still pass them. We all know their coming out with less skill than before – even the students know it, the employers sure as hell do... ...there's nothing I can do about it if I want my staff to still have jobs tomorrow.

Head of Department of a Qld TAFE construction department

• The audit requirements imposed upon RTOs being ineffectual despite significantly increasing the administration burden of teachers. TAFE teachers particularly are finding themselves expending copious amounts of time on data entry and audit trail requirements at the expense of developing appropriate learning strategies and contexts for their students.

...I feel like all I'm doing is stay on step in front of a complete stuff up.....we keep producing stuff and despite being audited management still can't tell us what's good, what's needed and what we can ditch...

NSW TAFE teacher trying to juggle his workload under stresses on various fronts

E. The NSW and Victorian state government funding models have impacted significantly and negatively on the operation, and indeed viability, of TAFE institutes. *This is due to:*

- The nature of entitlement models of funding being imposed. These models promote a greater number of full fee paying students through VET courses. With many that currently attend TAFE already economically disadvantaged, this will ultimately mean fewer students, decreased viability of courses, a reduced range of courses, and ultimately the elimination of outlying campuses, or services at those campuses.
- The greater demand to generate commercial income through expansion into areas of delivery that are outside TAFE's traditional sphere of operation. In many areas, such as trade training, this is simply not viable as it means developing and marketing courses that in reality have little real world relevance and at best very little potential of gaining adequate class sizes. Attempting to hard sell irrelevant courses to an industry that already has little or no respect for VET qualifications is only going to further this disenchantment.

...you and I both know that the only reason tradies will do a course is because they have to to get a licence for something. If its not mandatory you just wont get them in...

> TAFE teacher discussing the development of new commercial courses for construction trades

• The proposal of a university style loan scheme does little for many TAFE students as their likely income for many years will remain low. Indeed in the current economic climate, marginal at best.

...I guess the reality is I'd have no choice, I'd have to take the loan as there's no way I could pay up front... ...is it fair, I'm not sure.... ...I'm pretty sure you and all those politicians never had to pay it though...

First year apprentice's response to the proposal of a university style loan scheme for VET courses

• TAFEs only competitive edge over private providers being the issue of quality or depth of training. With funding cut significantly under the new model, the only way to level the playing field is to cut course delivery time, contact time, or put as much as possible on-line without appropriate tutorial support, with all the associated quality degradation issues as an outcome.

 A mistaken belief in the skill development capacity and cost effectiveness of on-line delivery. On-line provision is time consuming and expensive when done appropriately, and very poor in developing skills and knowledge when not.

...all I did was read a pile of stuff on the screen and tick boxes when I'd done... ...no one ever came out and saw me working on anything, how was I supposed to know?

> Third year apprentice from Qld having relocated into southern NSW. This comment was in response to questioning over power tool use after he made particularly dangerous mistakes with power tools.

• Funding being radically reduced across all areas of support staff. This increases further the non teaching workload of teachers, and potentially a lower quality of delivery.

Some closing remarks

Having reviewed the preceding material, readers should be in no doubt that both TAFE, and the VET sector in general, is in crisis and floundering: that it has lost its way, lost sight of its purpose. The role of the VET sector is to develop the skill and knowledge of the people such as to enhance the capability and capacity of communities large and small. That this development should be of the whole person, with a view to an increased sense of citizenship and responsibility, is now essential if any approach towards sustainability as a nation, indeed planet, is to be obtainable.

TAFEs still exist however, likewise many quality private RTOs. Thus the VET sector could be viewed more positively as being less in crisis, and more in an extended state of transition. This means the development of alternative approaches to VET are still able to be developed and implemented with reasonable ease.

Having conducted your inquiry I would humbly recommend therefore that the government seeks council on the development of a new model of VET that goes beyond competency, and engages VET's true purpose. Whilst funding must form part of this discussion, the greater part should be on how that funding is dispersed, and the forms of skill and knowledge development supported, rather than on a preconceived need for radical increases.

Finally, two documents have been uploaded with this submission for the purpose of adding depth to two areas particularly: Workplace delivery; and the vital role TAFE plays in community capability and capacity building. The prior, because it is receiving all too much focus without full appreciation of the implications and limitations. The latter for its failure to receive the attention it warrants, leading possibly to its demise as a role TAFE is capable of fulfilling.

The first document, therefore (Costin G.P. & Black J. A. [2006]: In the Dragon's Wake: VET, Breast Cancer and Brave Hearts - Journeys of the Whole Person. NCVER, Adelaide), describes one of the more significant projects I have been

involved with over the years and highlights the powerful role TAFE can play in community and individual recovery.

The second document (Costin G.P. [2008]: Avenues Other: A limited enquiry into workplace delivery and assessment. AVETRA, Adelaide) is in two parts. The first part deals with those issues confronting the VET sector regarding workplace delivery. The second part is a fictionalised retelling of what is essentially a factual case. Entitled 'The Gift', it attempts to highlight the potential implications when the system informing the actions of the VET practitioner gets it wrong.

I thank you for the opportunity to have input into this inquiry Yours sincerely

Glenn P. Costin 16 April 2013