

CHAPTER 4

Education quality and graduate outcomes

4.1 The quality of education or training provided by RTOs was, unsurprisingly, one of the main concerns raised by witnesses.

4.2 Noting the importance of a high-quality VET sector in Australia for individual students and employers alike, as well as for the health of the Australian economy overall, the committee considers these concerns to be of the highest importance.

4.3 Several key themes emerged in evidence provided to the committee by submitters and witnesses that suggests there are some serious problems with the quality of training provided by private RTOs:

- The sector's overall reputation: poor quality providers and courses, and the consequent negative publicity or word-of-mouth reputation, influences the sector's overall reputation and can negatively impact high-quality providers;¹
- Particular concerns exist regarding the quality of teaching and learning and inadequately measured assessment, primarily regarding qualifications awarded after insufficient lengths of time and offering students only superficial learning and assessment practices;² and
- Problems in the sector, including issues raised in the media, have contributed to scepticism amongst industry, employers and others in the sector including unions regarding the worth of some qualifications.³

The sector's overall reputation

4.4 Notwithstanding the existence of many high-quality private providers of vocational education and training, multiple submissions – particularly those from RTOs themselves and related industry bodies – noted that the approach taken by some providers caused problems for the sector as a whole.

4.5 The TAFE Directors Australia (TDA) is the peak national body representing Australia's government-owned TAFE institutes. In its submission, TDA noted that

1 TAFE Directors Australia, *Submission 12*; Australian Council for Private Education and Training, *Submission 28*; Mr Khanche, Australian Institute of Professional Education, *Committee Hansard*, 16 July 2015.

2 Australian Council of Trade Unions, *Submission 38*; TAFE Community Alliance, *Submission 31*; Australian Skills Quality Authority, *Committee Hansard*, 16 July 2015; Service Skills Australia, *Submission 27*.

3 Australian Industry Group, *Submission 30*; Australian Council of Trade Unions, *Submission 38*; Ms Bond, Guild Pharmacy Academy, *Committee Hansard*, 2 September 2015; Speech Pathology Australia, *Submission 25*.

there is evidence of 'two significant problems' which it characterised as both the reality of some providers and the perception of all:

Firstly the reality of poor quality in VET provision in the case of a few providers and secondly the much greater problem of widespread perception of questionable practice that is doing significant damage to the reputation of VET nationally. While perception and reality may be at different levels, increasingly they are one in the eyes of the public... The fallout from some private college behaviour has ricocheted around the training sector and caused much apprehension among students, parents and employers.⁴

4.6 The ACTU argued that government funding and student subsidies have not sufficiently distinguished between high and low quality providers, thus undermining the work done by the former.⁵

4.7 ACPET argued that this was a matter that the sector should take seriously given the effect that the problems caused by some providers has on the sector as a whole:

All registered training organisations (public, private, not for profit) are responsible for the sector's reputation and should unite to protect the VET brand.⁶

4.8 The TAFE Community Alliance noted that the public reputation of the private VET sector was being further undermined by the perception that these concerns are a widespread problem:

The issue around volume of learning, especially length of courses and quality of educational delivery, has plagued the VET system for some time now, but has been exacerbated with the increased marketisation of the VET sector. VET standards and regulations have once again gone some way to trying to address this issue but not far enough. The issue around volume of learning, especially length of courses and quality of educational delivery, has plagued the VET system for some time now, but has been exacerbated with the increased marketisation of the VET sector. VET standards and regulations have once again gone some way to trying to address this issue but not far enough.⁷

4.9 Mr Amjad Khanche of the Australian Institute of Professional Education argued that most private providers did do the right thing, and that providers such as his own were negatively affected by the actions of others in the sector:

Sadly, I understand that the behaviour of a number of bad apples in the VET sector continues to plague the reputation of all VET providers. I am deeply disappointed that the behaviour of those providers compromises the

4 TAFE Directors Australia, *Submission 12*, p. 1.

5 *Committee Hansard*, 16 July 2015, p. 44.

6 Australian Council for Private Education and Training, *Submission 28*, p. 23.

7 TAFE Community Alliance, *Submission 31*, p. 6.

standing of providers like AIPE, which is committed to offering our students the very best VET and higher education.⁸

4.10 The ACTU also expressed its concerns about the existence of poor-quality providers and further noted that these also place pressure on those who do attempt to provide quality education and training at reasonable prices:

The fact that so many RTOs were offering programs of such short duration means people were not getting the skills development and workplace experience they needed to go on and work safely and effectively in the workplace. It did not find that all providers were falling short, but this itself is part of the problem. It means that providers trying to provide high-quality programs are facing unfair competition from those who are reducing training and delivery effort to cut costs.⁹

4.11 Based on evidence received, it appears that many high-quality training providers exist in the VET sector, including amongst private for-profit RTOs. However, the reputation of the sector overall has been – and continues to be – negatively affected by providers who deliver inadequate education or training to their students.

4.12 Given the negative publicity about some providers and how this can affect a broader catchment of providers – including those doing the right thing – the industry may wish to consider steps it could take to collectively address these issues. For example, through providing public information that clearly sets out the nature of their courses and any expenses or debt that may be incurred.

Volume of learning and assessment concerns

4.13 Evidence received suggests that some VET providers are delivering courses of inadequate quality, most obvious in the extremely short timeframes in which some qualifications are offered, alongside insufficiently rigorous assessment practices. Students therefore do not get the education they pay for and ultimately may not have the skills they were seeking to attain through that course. This has wider reaching implications for the community, as will be discussed.

4.14 The ACTU summarised this problem in its submission:

One of the most commonly reported problems is that courses that are clearly too short, being delivered in a fraction of the time they are delivered by reputable providers. In some reported cases, there is virtually no training at all, as training and assessment is done on a 'tick and flick' basis.¹⁰

4.15 In ASQA's review of RTO marketing practices, discussed in the previous chapter, it was noted that:

8 *Committee Hansard*, 16 July 2015, p. 1.

9 Australian Council of Trade Unions, *Submission 38*, p. 20.

10 Australian Council of Trade Unions, *Submission 38*, p. 19.

While there are legitimate circumstances in which clients might obtain qualifications quickly, for example if they have prior relevant experience and skills, it is these marketing headlines, perhaps more than any others, that generate stakeholder concerns and lack of confidence in VET qualifications... The marketing of short duration programs has the potential to undermine consumer and industry confidence in nationally recognised qualifications as it perceived that the training is likely to lack rigor and quality.¹¹

4.16 As an illustration, one example found by ASQA in that review included an advanced diploma earned in two weeks.¹² The Australian Qualifications Framework notes that an appropriate volume of learning for an Advanced Diploma is typically 1.5 to 2 years.¹³ Such abbreviated time frames serve to undermine the worth of all qualifications in the field, since it is not readily apparent to employers, for instance, which Applied Diplomas have been awarded after two years of study and which have been awarded after two weeks.

4.17 The TAFE Community Alliance noted that they had 'been made aware of students coming to TAFE to undertake further learning because the hours delivered by private providers, eg. in languages, were too few'.¹⁴

4.18 In light of this evidence, it would seem that inadequate training may result in some students incurring additional training costs as they need to supplement their original study with further courses in order to gain the skills required for their role.

4.19 Service Skills Australia, while recognising the flaws in a purely hours-based understanding of whether a course was sufficient or otherwise, argued that,

A key concern has also been the availability of courses of an excessively short duration. While it is the case that a competency-based vocational education system is difficult to regulate in terms of duration, given it is not intended to be a time-based system, it is undoubtedly the case that poor quality outcomes have been related to the provision of unjustifiably short or 'fast-tracked' courses.¹⁵

11 Australian Skills Quality Authority, *Marketing and advertising practices of Australia's registered training organisations*, Report, September 2013, p. 20, http://www.asqa.gov.au/verve/resources/Strategic_Reviews_2013_Marketing_and_Advertising_Report.pdf.

12 Australian Skills Quality Authority, *Marketing and advertising practices of Australia's registered training organisations*, Report, September 2013, p. 20, http://www.asqa.gov.au/verve/resources/Strategic_Reviews_2013_Marketing_and_Advertising_Report.pdf.

13 Australian Qualifications Framework, Second Edition January 2013, p. 42, <http://www.aqf.edu.au/wp-content/uploads/2013/05/AQF-2nd-Edition-January-2013.pdf>, accessed 30 September 2015.

14 TAFE Community Alliance, *Submission 31*, p. 6.

15 Service Skills Australia, *Submission 27*, p. 3.

4.20 Numerous submissions¹⁶ suggested that at least part of this problem could be solved by introducing minimum hours for all courses, with that minimum varying depending on the nature of the course and the degree of the qualification involved.

4.21 In considering this issue, ACPET argued that increased oversight in this area would benefit students and providers:

ACPET believes closer scrutiny of how the 'amount of learning' in determined, advertised and delivered for courses will help ensure learners acquire the skills of a certification.

ACPET acknowledges that it is challenging for government to regulate how long a qualification should take, as there are many variable within each type of training scenario, such as Language, Literacy and Numeracy issues, Disabilities and location of delivery... While the improved standards relating to marketing and advertising have been enhanced, through the review of the promotion of excessively short courses, it will be beneficial to all RTOs for regulators to provide additional advice and support in understanding the requirements for volume of learning.¹⁷

4.22 The Workplace Research Centre also made this recommendation:

The quality framework should maintain a minimum number of hours of delivery wherever this involves public subsidy (including indirect subsidy through VET FEE-HELP).¹⁸

5.1 In its submission, ASQA noted that the new Standards make reference to the question of 'amount of training' students undertake and consequently is:

currently adjusting its audit practices to ensure it examines the training and assessment strategies of RTOs to ensure they are consistent with these requirements.

ASQA notes that, if VET qualifications themselves clearly mandated volume of learning requirements within the qualification specifications, rather than relying on the volume of learning specifications contained within the Australian Qualifications Framework, ASQA would be better able to pursue those RTOs offering training and assessment in very short timeframes (as a direct breach of the NVETR Act).¹⁹

4.23 Noting that ASQA has begun to consider the issue, Service Skills Australia stated:

We are supportive of the suggested approach in the current Discussion Paper for the Review of Training Packages and Accredited Courses to incorporate additional delivery and assessment measures detailed in the

16 Australian Council for Private Education and Training, *Submission 28*; Service Skills Australia, *Submission 27*; Workplace Research Centre (*Submission 62* appendix)

17 Australian Council for Private Education and Training, *Submission 28*, pp. 19-20.

18 Workplace Research Centre, commissioned by Australian Education Union, *Submission 62*, appendix p. 44.

19 Australian Skills Quality Authority, *Submission 60*, p. 15.

2013 VET Quality Report. These measures include specifying volume of learning requirements for selected high-risk units of competency and qualifications. That is, training providers would be able to stipulate a range of hours for learners to achieve learning outcomes, with consideration given to the characteristics of the learner.²⁰

4.24 The committee is of the view that considering standards of minimum hours required for courses is a practical option that could be explored as a way to help to resolve this issue.

4.25 A related issue raised in submissions to this inquiry is that of students being assessed in ways that guaranteed that they would pass. For example, Ms Marietta Cully, a former student at Hospitality Training Australia, provided evidence in her submission that practices existed whereby students were guaranteed a pass:

Students were tested, after which answers were provided and where applicable, students simply reattempted the test until they passed.²¹

4.26 Ms Julie Skinner, a former tutor with a private RTO, noted that in her experience, there was a level of pressure exerted on teaching staff to encourage them to pass students and even clearly plagiarised work submitted for assessment was marked competent in order to pass the students through the course.²²

4.27 The committee also received evidence suggesting that some providers would grant students qualifications based on Recognition of Prior Learning, even where that student had no previous knowledge or experience in the area.²³ Such an approach potentially places people at risk when they are simply unable to do a job for which they have a qualification.

4.28 One submitter, with a background including work auditing VET providers, argued that the entire question of qualifications through Recognition of Prior Learning (RPL) is a complex one, yet is rarely treated as such:

Recognition of Prior Learning is an assessment process designed to recognise the existing competence a person has regardless of when and how that knowledge and skill was obtained. Conducting an RPL assessment properly is an extensive activity of evidence gathering and relies on an informed professional judgement. I question the level of that professional judgement when I know that many thousands of assessors have only receive[d] one week's worth of training from someone who had received one week's worth of training and so on.²⁴

20 Service Skills Australia, *Submission 27*, p. 3.

21 Ms Marietta Cully, *Submission 79*, p. 3.

22 Julie Skinner, *Submission 73*, pp. 1-2.

23 Tracey Baker, *Submission 87*.

24 *Submission 57*, p. 7.

4.29 Mr Anthony Norris, a student previously enrolled in a Diploma of Counselling at Evocca College, recounted that the assessment in his course entailed being given an answer book and answer sheets:

You don't actually learn very much at all, it is simply a matter of taking the answer from the book and fill in the blanks. Even the question sheet is worded very similarly to the 'readings'.²⁵

4.30 These first-hand accounts by students and educators are cause for concern as they suggest a failure to provide a meaningful learning experience with robust training that leads to properly qualified workers. This may lead not only to disappointment but may pose a more serious threat to the community when people are not adequately able to undertake job-related tasks confidently or safely.

4.31 A number of organisations raised similar concerns, such as the ACTU which noted problems uncovered by ASQA with the certification of the construction industry's safety training qualification (the 'White Card'):

The Industry Skills Council for the sector recommended six hours for the white card training, but ASQA research found the RTOs using online delivery all had training and assessment strategies of four hours duration or less, with most people completing training and assessment in less than one hour, some as little as 30 minutes. Some had no actual training at all, with only a knowledge test. The potential for identity fraud with online training was another key finding, as none of the online delivery RTOS were adequately assuring the identity of students.²⁶

4.32 While it is difficult to quantify the extent of this issue, it appears that examples of VET providers granting qualifications based on inadequate assessment regimes cannot be dismissed as isolated examples.

4.33 The committee notes that it may indeed be a small minority of providers who engage in the activities suggested here, but the question goes again to the sector's overall reputation and feeds into concerns about the worth of qualifications issued in the VET sector.

The worth of qualifications

4.34 A substantial problem raised by multiple submitters²⁷ was that qualifications issued by VET providers, which should be standard across any given qualification type or industry, in fact vary considerably and that this reflects a broad range in the quality of courses depending on the quality of the provider.

25 Anthony Norris, *Submission 72*, p. 1.

26 Australian Council of Trade Unions, *Submission 38*, p. 19.

27 Australian Industry Group, *Submission 30*; Australian Council of Trade Unions, *Submission 38*; Ms Bond, Guild Pharmacy Academy, *Committee Hansard*, 2 September 2015; Speech Pathology Australia, *Submission 25*.

4.35 In particular, this was a problem raised by industry and employer groups, along with unions, all of whom recognised the difficulties faced by employers and workforces alike when newly qualified workers may not have the skills or knowledge suggested by the qualifications they hold.²⁸

4.36 In discussing feedback from their membership group, Australian Industry Group (AI Group) noted that they had:

Experienced disquiet from employers concerning inadequate time in the delivery of courses by providers, inadequate assessment of competence and poor quality training outcomes.²⁹

4.37 The ACTU argued that the consequence of the inadequate training and assessment, and therefore the disputed worth of the qualifications they led to, is a loss of confidence by industry 'in the value of the White Card to assure workplace safety for new entrants to the construction industry'.³⁰

4.38 The public safety implications of this level of uncertainty was perhaps highlighted best by Ms Sue Bond, Head of the Guild Pharmacy Academy, when asked about her concerns regarding inadequate training:

In this case—and it was a couple of years ago—I spoke to the young woman in question at length. She was employed in a pharmacy. One night they were taken into a room and asked to sign a range of documents. She was unaware of what she was signing. However, she was told that if she signed them she would get a \$500 incentive payment. She then worked for a couple of months in that pharmacy, and, in that time, from what she was aware of, she was observed on one occasion by someone from a company. She then left that pharmacy and went to another pharmacy, and this is when we became aware of the problem. The pharmacist rang us. He had worked with us on a number of occasions; he had put lots of people through our training. He said, 'I've got this pharmacy assistant who has a certificate III and she doesn't know what an analgesic is.' That obviously raised some concerns. When I spoke to the young woman, she had left the initial pharmacy and about six months later received a full qualification in the mail.³¹

4.39 Ms Bond indicated that inadequate training can pose a public safety risk, and demonstrated with a range of over-the-counter products:

I am a teacher at heart, so I brought along some examples. Everyone is suffering from colds and flu at the moment. You can go into a pharmacy and you can buy some Codral—you can buy these in a supermarket as well—to make you feel better. You can also buy some Lemsip because you have a sore throat. And because you have some aching bones you might

28 Australian Industry Group, *Submission 30*; Australian Council of Trade Unions, *Submission 38*; Ms Bond, Guild Pharmacy Academy, *Committee Hansard*, 2 September 2015.

29 Australian Industry Group, *Submission 30*, p. 2.

30 Australian Council of Trade Unions, *Submission 38*, p. 19.

31 *Committee Hansard*, 2 September 2015, p. 36.

buy some Panadol or Panadol Osteo. All of those products contain paracetamol. If you take all of these products as directed on the pack, you are actually taking a toxic level of paracetamol. If you continue to do that, you will cause yourself some fairly significant liver damage. I went and bought these this morning and, when I bought them, the pharmacy assistant said, 'Are you going to be taking all of these at once?' That is what we want. We want educated staff who are aware of the dangers of taking medicines and who are able to alert customers so that they do not cause themselves harm.³²

4.40 Ms Bond further stated:

It does strike me as fraudulent behaviour. It concerns me enormously because I am passionate about the VET sector. I have been in it for a long time, and to see this sort of behaviour—but also from the community point of view, I would be hugely concerned if my mother or my grandmother or a family member was not provided with that level of advice and information.³³

4.41 This evidence highlighted to the committee the real and potentially deadly results of people finishing their VET courses without being provided adequate training to do their job.

4.42 It is clear that proper, high-quality training is essential and should not be compromised because of profit or time motivations.

4.43 Safety on construction sites was highlighted by the ACTU, who also noted that employers without confidence in the training system and its assessments are choosing to retrain their workers to ensure that they are in fact trained to the level their qualifications suggest they will be:

I just want to make the points about high-risk work licensing, which is about things like scaffolding, dogging and rigging. Any search of the website will show you that these courses are being run very quickly. I give the example of basic scaffolding. It has 129 assessment questions, of which the students must do 84. It has maths questions. It has 12 practical tasks, which include the erection of three scaffolds. It takes us one day just to do the assessment. The learning that is required to get people to that level is much more significant than that, but if you look on website you will see people offering that for three to four sessions. These are the work platforms that people work from on sites. The sum total of all of this is, I believe, a lack of confidence in the system and a really blatant misuse of resources. So you have poor skills, you got poor occupational health and safety practice but you also have employers just not trusting the qualifications that are coming through. What has emerged is what is called a verification of competencies. When someone goes to get a job on a site they are asked to have their qualifications reassessed. So you have this parallel system, which is unregulated, of assessments, of checking people's qualifications, because

32 *Committee Hansard*, 2 September 2015, pp. 36-7.

33 *Committee Hansard*, 2 September 2015, p. 37.

employers do not have confidence in the system. It is a bit of a gravy train.³⁴

4.44 This demonstrates a commitment by some employers to ensure their staff are properly trained, but also highlights problems and inefficiencies which are consequences of the unreliability of some qualifications issued by some VET providers.

4.45 The need for better regulation in order to avoid these problems emerging, and stronger enforcement of existing regulations, was noted by Mr Stephen Bolton, Senior Adviser, Employment, Education and Training, of the Australian Chamber of Commerce and Industry:

It is a major issue for us. It is heartbreaking to think of young people who have gone through and gained a qualification that has been revoked or who have recently learnt that the qualification would not get them the outcome they were seeking. Indeed, many employers have employed some of these young people and discovered that they do not have the skills that the piece of paper purports they have.

As I was saying, it is predominantly a regulatory issue. The standards for RTOs have been in place. While the previous standards were inadequate in a number of areas, especially in the training and assessment side of things, they were simply not properly enforced by the regulator, be it the national regulator or the VRQA.³⁵

4.46 Mr Bolton's emphasis on the need for stronger enforcement of regulations around qualifications issued by VET providers suggests that this key issue of concern in the sector could be addressed by further empowerment of ASQA as the industry regulator.

4.47 During the hearing, the committee made the point that the question of worthless qualifications is about public safety:

This is not just heartbreaking though; this is of incredible importance to public safety—not to mention the individual safety of particular workers. You have people who cannot read labels put into hospitals, you have people in charge of children who are not qualified to actually perform their function and you have people on building sites who cannot use the equipment. It is not just the question of being heartbreaking; it is actually much more serious. I am just wondering how we could get to a circumstance where this is allowed to occur.³⁶

4.48 Mr Bolton was of the view that:

34 *Committee Hansard*, 16 July 2015, p. 37.

35 *Committee Hansard*, 16 July 2015, p. 47.

36 *Committee Hansard*, 16 July 2015, p. 47.

It is a case that, primarily, the regulatory structure was not able to keep up with the increase in demand. We had a compliant system in place that was not effectively enforced.³⁷

4.49 Even where the public safety issues are less significant or not present, the nature of inadequate or inconsistent levels of training is an area of concern for employers.

4.50 Alongside this concern, the ACTU also pointed to the substantial economic issues inherent in members of the construction industry being insufficiently trained:

From a manufacturing point of view, and it is an area of particular interest, we worry deeply that the people who are building our bridges, our submarines – hopefully our submarines – and our ships have the skills that are required to produce a product that is sustainable and that will drive the Australian economy.³⁸

4.51 In their submission, Speech Pathology Australia noted concerns in the industry with significant variation in the quality of teaching of speech pathology electives as part of the Certificate IV Allied Health Assistance:

Speech Pathology Australia members have reported significant differences between the skills of graduates depending on the course they have undertaken even though the curriculum studied was reported as having been identical.

Of particular concern to our profession, we have received reports of non-speech pathologists being employed to teach the speech pathology components and/or supervise allied health assistant (AHA) students undertaking placements within speech pathology settings. This is unacceptable to our profession.³⁹

4.52 Pointing to ASQA's 2013 report into RTOs – particularly in terms of marketing and advertising – the AI Group noted that several of ASQA's main findings 'further highlight the major concerns experienced across the sector', including:

Training with a delivery duration that is too short to meet industry requirements and with insufficient time for workplace skills development. Work based experiences are mandatory in some cases.

Training and assessment strategies that are not well developed, not compliant or did not involve industry consultation.⁴⁰

4.53 Employers, the AI Group points out, are clients of VET providers too, and concerns about the usefulness or appropriateness of qualifications can make it difficult for employers to make decisions about training for their workforce.⁴¹

37 *Committee Hansard*, 16 July 2015, pp. 47-8.

38 *Committee Hansard*, 16 July 2015, p. 38.

39 Speech Pathology Australia, *Submission 25*, p. 3.

40 Australian Industry Group, *Submission 30*, p. 2.

41 Australian Industry Group, *Submission 30*, p. 3.

4.54 In light of the very serious issues raised around safety, economic and productivity considerations, graduates with inadequate training or experience, employers wasting money and time seeking to train their workers, the committee is deeply concerned about the quality of training some private RTOs are providing.

4.55 The committee is of the view that, as with other issues in the VET sector, the problems caused by some providers are causing major reputational damage to the whole sector, including high-quality RTOs with a history of providing quality training.

4.56 The committee is firmly of the view that the community must not be placed at further risk as a result of the ample evidence of shoddy training, inadequate trainers or assessment that lacks robustness.

Subcontracting

4.57 A related issue brought to the committee's attention is that of subcontracting of the delivery of training. In this circumstance, a student enrolls with an RTO but the actual training is carried out by an unregistered organisation. Issues about both regulation and quality were raised.

4.58 The AEU discussed the problems inherent in this type of delivery. The committee expressed a view that 'unregistered providers are the Achilles heel of the whole regulatory system' and asked the AEU whether a person or an entity, though not themselves registered, can enter into a third-party arrangement with a registered training organisation and be beyond the scrutiny of all the regulators.⁴²

4.59 Ms Pat Forward, Federal TAFE Secretary and Deputy Federal Secretary of the AEU responded:

What I am saying is that a registered training organisation can contract the training, either individually with students or with the government, and then subcontract that delivery to an unregistered entity.⁴³

4.60 Ms Forward indicated that the problem was 'widespread' and had implications for the regulator. When asked whether descriptions of ASQA as a 'toothless tiger' were justified, Ms Forward responded:

We have an ongoing concern with the strength of the regulations. Nevertheless, there is a system whereby providers are required to register in order to deliver national qualifications. At the same time, we have a system that allows registered training organisations to subcontract delivery to organisations which are not registered. Is it widespread? My understanding is that it is. The subcontracting of delivery occurs in, at least, all of the eastern seaboard states. I do not understand why the system itself is not able to give you that information.⁴⁴

42 *Committee Hansard*, 2 September 2015, pp. 4-5.

43 *Committee Hansard*, 2 September 2015, pp. 4-5.

44 *Committee Hansard*, 2 September 2015, pp. 4-5.

4.61 The committee notes with concern the regulatory issues raised by the existence of unregistered training providers being used as subcontractors by RTOs and suggests that greater scrutiny of this practice should be considered by the regulator.

4.62 A possible solution to this problem was brought to the attention of the committee by the Victorian Department of Education and Training. As part of that government's review of VET provision, they are considering introducing a reform whereby registered organisations seeking to subcontract out any part of the training for which they have been contracted would be obliged to receive the Department's approval for any such subcontracting arrangement. The committee notes that this idea should be explored nationally.

Particular issues in the Early Childhood and Aged Care sectors

4.63 Few areas of training have attracted the levels of scrutiny and criticism as those in the Early Childhood and Aged Care sectors. Shortcomings in the training of students for employment in these fields have been extensively covered and the topic of considerable media and public interest, particularly in light of the mass recall of qualifications issued in Victoria.⁴⁵

4.64 The concerns about quality of training in the care sector have primarily focused on qualifications being issued after only brief periods, and particularly with minimal workplace experience for students. The committee will outline some of these issues in this report.

4.65 Concerns about inadequate training in these fields are of particular interest, since they directly impact upon some of the most vulnerable members of the Australian community: young children and the aged. Providing high-quality care to these groups should not be compromised by the poor standard of training which has been described.

Early Childhood

4.66 Concerns were raised by Early Childhood Australia in their submission, drawing on discussions and surveys within their industry:

45 'Hundreds of Vocation private training college graduates forced to hand back qualifications', *ABC News*, 22 April 2015, <http://www.abc.net.au/news/2015-04-22/private-training-college-graduates-stripped-of-qualifications/6412318>, accessed 1 October 2015; 'A new report has found that a massive 70 per cent of childcare courses take less than a year to complete', *News.com.au*, 19 August 2015, <http://www.news.com.au/lifestyle/parenting/a-new-report-has-found-that-a-massive-70-per-cent-of-childcare-courses-take-less-than-a-year-to-complete/story-fnet08ui-1227490464562>, accessed 1 October 2015; 'Childcare centres shocked at second-rate training of staffworkers', *The Australian*, 22 August 2015, <http://www.theaustralian.com.au/news/inquirer/childcare-centres-shocked-at-second-rate-training-of-staffworkers/story-e6frg6z6-1227493608775>, accessed 1 October 2015; 'Childcare centres blacklist accredited training organisations providing poor graduates', *ABC News*, 10 September 2014, <http://www.abc.net.au/news/2014-09-10/childcare-centres-blacklist-organisations-over-poor-training/5732270>, accessed 1 October 2015.

While the quality of training has improved, we recognise that there are still concerns about aspects of training delivery which can help to inform future practice and regulation of the sector.

Broadly, the sector is concerned about the quality of graduates. Early Childhood Australia's members were most concerned about the relationship between the quality of graduates, and courses being conducted over a short timeframe.⁴⁶

4.67 An Early Childhood teacher/director quoted by Early Childhood Australia commented that:

We have no confidence in the competency of graduates of a number of RTOs, especially fast tracked courses with poor quality, 'tick and flick' content. Students with literacy issues routinely pass competencies without a clear understanding of content.⁴⁷

4.68 United Voice, the union representing workers in the child care sector, noted in its submission their concerns with training standards; making the point that qualified staff are needed to ensure quality care for some of our most vulnerable people:

United Voice members working in the areas of aged care and early childhood education and care (ECEC) have raised serious concerns about the quality of training being delivered by some of the private training providers that are increasing their presence in these sectors.

Both of these sectors have high staff turnover and struggle to attract and retain the qualified staff needed to ensure some of our most vulnerable Australians receive the care and - in the case of ECEC, the early education - they need. The pressure for services to have qualified staff combined with government incentives for private providers have led to a situation where some private providers are rushing people through courses with little or no regard as to the quality of learning outcomes.⁴⁸

4.69 The members surveyed by Early Childhood Australia suggested that many of the trainers employed to train students do not themselves have sufficient knowledge or understanding to pass on to their students.⁴⁹ This is of concern since it suggests a pattern of poor-quality training is being perpetuated in some professions, which may pose systemic problems.

4.70 The consequence of this insufficient training is that students are finishing their course without having the skills necessary to work in the sector. An Early Childhood Education Centre service director responding to Early Childhood Australia's survey noted that:

46 Early Childhood Australia, *Submission 44*, pp. 4-5.

47 Early Childhood Australia, *Submission 44*, p. 5.

48 United Voice, *Submission 45*, p. 1.

49 Early Childhood Australia, *Submission 44*, p. 5.

We see this [poor quality training] in recruiting new staff, when applicants are unable to complete a job application and are unable to answer even simple questions about children's learning.⁵⁰

4.71 A related issue was raised by United Voice, who noted that the poor reputation of some providers in this sector has rendered the qualifications they issue a barrier to employment for those students who have undertaken them:

In some areas, service providers have developed unofficial 'black lists' of training providers whose graduates will not be accepted due to the poor quality of the training provided. While this is entirely understandable on behalf of the providers who need to ensure the quality of the services they provide, it also grossly unfair for the graduates who have invested time and money in obtaining what is essentially a useless qualification.⁵¹

4.72 Similarly, Melbourne City Mission noted that:

The demand-led system has delivered VET courses of widely varying quality. As an employer of aged care, disability and child care staff, Melbourne City Mission's dissatisfaction with the quality of graduates has been such that we have developed through our RTO our own Certificate III course in Early Childhood Education and Care.⁵²

4.73 The committee notes with concern the potentially negative effects of this inadequate training amongst those responsible for caring for Australian children.

Aged Care

4.74 Many of the concerns, including excessively short courses, limited work placements and inadequate assessment practice, held about the training of workers in the Early Childhood sector have also been expressed regarding workers in the Aged Care industry.⁵³

4.75 In 2013 ASQA engaged in a review of aged and community care training, initiated in response to concerns raised by the Productivity Commission's 2011 report, *Caring for Older Australians*.⁵⁴

50 Early Childhood Australia, *Submission 44*, p. 6.

51 United Voice, *Submission 45*, p. 2.

52 Melbourne City Mission, *Submission 46*, p. 4.

53 'Vocation to tear up 1100 student qualifications including first aid, aged care', *Sydney Morning Herald*, 18 May 2015, <http://www.smh.com.au/business/vocation-to-tear-up-1100-student-qualifications-including-first-aid-aged-care-20150518-gh4bd8.html>, accessed 1 October 2015; 'Aged care training courses under fresh scrutiny', *Australian Ageing Agenda*, 23 January 2015, <http://www.australianageingagenda.com.au/2015/01/23/aged-care-training-courses-fresh-scrutiny/>, accessed 1 October 2015.

54 Australian Skills Quality Authority, *Training for aged and community care in Australia*, Report, September 2013, p. i, http://www.asqa.gov.au/verve/resources/Strategic_Reviews_2013_Marketing_and_Advertising_Report.pdf.

4.76 ASQA's review confirmed the concerns reported by the Productivity Commission, noting that:

The quality and quantity of training in the sector varies widely, with insufficient on-the-job, or work-based, training being provided. Some trainers and assessors were identified as not having current industry experience.⁵⁵

4.77 ASQA, following the evidence presented to the Productivity Commission, noted that several key concerns exist, but that there was an over-arching problem with the wide variability of training quality and quantity students undertaking qualifications in Aged Care could receive.⁵⁶

4.78 As with Early Childhood care, a significant field of variability in the training of Aged Care workers was that of practical experience gained through work placements as a part of the training.⁵⁷

4.79 Employers in particular expressed considerable concern about training courses which did not include work placements, with several noting that applicants without suitable work experience would not be considered for employment, regardless of the qualification they held.⁵⁸

4.80 While this suggests a responsible approach by employers, it may place some people at a disadvantage after they have obtained what they believe to be worthwhile qualifications. As suggested earlier in this report, additional training may be required in some situations where quality training was not provided, and this can raise further costs for students.

4.81 The evidence thus suggests that students being trained to work in the Aged Care sector are possibly receiving inadequate levels of training, with the result that they may hold a qualification but are in reality unprepared for employment in the field.

4.82 ASQA recommends in its report into the sector that they:

continue to make the regulatory scrutiny of aged and community care training a very high priority in its regulatory approach. ASQA should continue to require the inclusion of aged and community care training and

55 Australian Skills Quality Authority, *Training for aged and community care in Australia*, Report, September 2013, p. ix.

56 Australian Skills Quality Authority, *Training for aged and community care in Australia*, Report, September 2013, p. 28.

57 Australian Skills Quality Authority, *Training for aged and community care in Australia*, Report, September 2013, pp. 28-9.

58 Australian Skills Quality Authority, *Training for aged and community care in Australia*, Report, September 2013, pp. 44-5.

assessment, as a mandatory requirement, in the sample of qualifications for any audit it undertakes of any RTO offering such training.⁵⁹

4.83 ASQA further recommended that any RTO offering aged care training courses should be required to attend information workshops on training and assessment strategies to assist them to comply with regulatory standards.⁶⁰

4.84 The committee expresses deep concerns regarding the quality of training being undertaken by many students in the Aged Care sector, and believes there is a real risk to public health and safety, particularly in such a vulnerable community because of the low standards of training some RTOs are providing.

4.85 There is no reason to believe that these issues are confined to the Aged Care or Early Childhood sectors. In the course of the inquiry the committee has also heard evidence that these practices are rife in the construction and security industries.

Recommendation 10

4.86 The committee recommends that the government apply, in consultation with industry and quality providers, minimum hours standards to VET FEE-HELP eligible courses.

Recommendation 11

4.87 The committee recommends that the Australian Skills Quality Authority be given the powers to take swift and strong action against Registered Training Organisations found to be providing inadequate training to their students.

Recommendation 12

4.88 The committee recommends that the Department of Education and Training should have to approve any instances of Registered Training Organisations subcontracting out components of their VET FEE-HELP eligible training to non-registered third parties.

Recommendation 13

4.89 The committee recommends that the Australian Skills Quality Authority maintains its close scrutiny on and gives priority to the Early Childhood and Aged Care training sectors, given the concerns noted in this report.

59 Australian Skills Quality Authority, *Training for aged and community care in Australia*, Report, September 2013, p. 58.

60 Australian Skills Quality Authority, *Training for aged and community care in Australia*, Report, September 2013, p. 59.

