

**IEU SUBMISSION TO
ANTA/ACACA
CONSULTATION PAPER**

**“Principles and Framework
for the Consistent Application of the
National Training Framework within Secondary Schools”**

1. INTRODUCTION

- 1.1 The Independent Education Union of Australia is the federally registered organisation which represents the industrial and professional interests of teachers and support staff who work in non-government schools and institutions across Australia. Such institutions include early childhood and pre-school centres, primary and secondary schools and colleges and post compulsory private training institutions including ELICOS colleges. The union has a current membership of approximately 44,000 members.
- 1.2 The union is pleased to have the opportunity to comment on the ANTA/ACACA consultation paper “Principles and Framework for the Consistent Application of the National Training Framework within Secondary Schools”. Over the past five years schools and teachers have been stretched to the limit trying to integrate into the operation of their schools, the large number of initiatives which have arisen from the vocational education and training reform agenda.
- 1.3 The IEU and its members have a strong interest in the curriculum, assessment and certification arrangements which exist across the nation and the diverse approaches to prepare young people for further education and for the workforce. Central to these concerns are the role and purpose of schools and their interrelationship with other educational institutions, including TAFE, private providers of post compulsory education and training and universities.
- 1.4 In 1997, the IEU made submissions to and appeared before the Senate inquiry into the Status of Teachers. In that submission, the IEU argued the following:
- a. *In 1996, the federal government developed policy initiatives known as New Apprenticeships which provided for a substantial expansion of structured vocational training opportunities in years 11 and 12 of secondary schooling. This will allow students to begin an apprenticeship while still at school, and will add a significant dimension to the roles of schools and teachers and impact upon the workload of all education staff.*
 - b. *The IEU believes that the relevance and value of upper secondary schooling will be perceived by students, their parents, industry and the community when the broadest possible range of options and career paths is known and understood and can be delivered equitably, efficiently and at a high standard to students. Substantial issues must be addressed in a comprehensive integrated strategic plan. Such a strategic plan should provide for the development of VET programs in schools which are valued by industry, provide multiple pathways for students into careers and/or further training and education which are recognised by the key stakeholders in education and industry. These issues include:*
 - *Strategies to address the strong cultural bias in favour of a general academic education compared to the vocational education courses, whilst at the same time ensuring that genuine and flexible pathways are in place which can support the notion of life long learning.*
 - *Increased resources to provide equitable access to high quality and relevant inservice and professional development for teachers who are required to deliver particular vocational education courses.*

- *An increased level of resources for schools to have the time to properly rethink the way they are organised, and how to prepare, deliver and support senior secondary curriculum to an increasing number of students wishing to study vocational courses.*
- *Strategies to ensure the availability of properly qualified staff in sufficient numbers to meet the increasing demands of students undertaking vocational education.*
- *A resource and strategic plan to establish stronger links between schools, TAFE and industry.*

1.5 Schools are required to meet the broad educational needs of a very diverse school population. Relevant and quality education has to be delivered across the K-12 levels to students of different socio economic and cultural backgrounds and with different learning styles and capacities. Schools are required to balance the need for relevant vocational education within their operation with the broad educational needs of the student population.

1.6 Historically, the higher education sector has had a powerful influence upon the senior secondary curriculum and generally the community has placed a higher value on studies at university and on credentials from university. Essentially, this influence has controlled curriculum and assessment in post compulsory education and has acted as an impediment to schools providing what should be equally valued, vocationally oriented courses.

The IEU believes that the relevance of a comprehensive strategic plan as set out above to achieve a viable and relevant VET in Schools agenda consistent with the nationally agreed National Training Framework and the Australian Recognition Framework (ARF) arrangements remains paramount.

2. OTHER CONTEXTUAL DEBATES

2.1 *In 1997, the IEU made a submission to the House of Representatives Inquiry into the Role of TAFE. In that submission, the union noted the following:*

a. *The IEU has serious concerns regarding the resourcing implications for schools in ensuring that there is quality provision of vocational education. It is important to recognise that the schooling system must provide quality teaching and learning for all students across the K-12 years. There are many other educational agendas which must be addressed by schools:*

- *the early years - literacy and numeracy etc.;*
- *the middle years - appropriate structures, resourcing and pedagogy;*
- *special needs students;*
- *changing emphasis on outcomes based education and meeting individual needs;*
- *greater community involvement, parent participation, interagency approaches in schools.*

b. *While strategies have been developed for promoting seamless education and training and there is a blurring of the roles of schools, TAFE and higher*

education, the IEU supports the existence of an independent VET sector aimed at servicing industry needs supported by a strong, well resourced TAFE system.

- c. *The IEU believes that there is strong support and credibility within the community, particularly the parent community, for the TAFE sector. It is the largest provider of technical and further education, has a range of quality assurance and access and equity policies and practices in place and while there are different structural arrangements existing in different states and territories, well developed infrastructure and a reservoir of corporate knowledge about further education and training exists within the sector.*
- d. *The IEU believes it is important to focus and strengthen the respective roles of schools, TAFE and higher education, which does not preclude the possibility of cooperative alliances and partnership arrangements between institutions within the sectors.*

Such arrangements would recognise that while some overlap and blurring of the roles of the sectors occurs, there exists the legitimate core business of each of the sectors.

- 2.2 Over the past few years, a substantial number of private providers of VET courses have been established as a result of government policy on the training reform agenda.

The IEU strongly supports the development of nationally consistent regulatory frameworks to ensure that students and teachers who attend private training institutions are assured that all the quality control factors exist in relation to provider and course accreditation, registration, staff qualification, credentialing and articulation.

Students and teachers in the non-government sector use both private and public providers of VET courses, and issues of relative cost of courses, access and equity, quality assurance and coordination are particularly important.

The IEU acknowledges the validity of criticism (including from some non-government schools and systems) concerning an inflexible and slow response from TAFE to various aspects of the training reform agenda. Nevertheless, on balance the union believes that organisational models for TAFE colleges exist within states which provide for best practice delivery of the training agenda and there are also excellent private provider institutions. Cooperative alliances between clusters of TAFE Colleges, including metropolitan and rural and private providers have developed strong mutual training partnership arrangements. Schools and universities are also included in such cooperative alliances. This has the effect of:

- strengthening resource utilisation and sharing;
- strengthening partnership arrangements with other education institutions and with industry;
- enhancing access and equity for those who are disadvantaged through socio economic, circumstance or geographic isolation;
- sharing of specialist staff resources and enhancing flexible delivery arrangements.

3. THE SIX PRINCIPLES

3.1 The IEU generally supports the six principles to underpin the implementation of VET in Schools as set out in the consultation paper. A comprehensive VET strategy based on these principles would have the capacity to address the above key issues.

3.2 The union believes that principle 5 “Determining Priorities for the Delivery of VET in Schools” should be strengthened. For instance, the IEU is concerned:

- that the courses selected for development should not have too narrow a focus in relation to a particular industry and that all key competencies can be covered in the course.
- that there is a need to define what is meant by ‘opportunities for equity groups to participate are also to be maximised’. There is general concern about access for students in rural areas where there is almost an informal quota because of insufficient workplaces for structured workplace learning. In areas where limited placements exist, the needs of less able students and girls are often overlooked.

The IEU believes that a focused equity strategy should be developed to address these and other equity issues

4. IMPLEMENTATION ISSUES

4.1 In the non-government education sector, there has been an uneven pattern of implementation of the VET agenda at both the systemic and individual school level across all the States and Territories. Even within states, different diocesan authorities and regional school authorities have given different emphasis to this agenda and this is reflected in their policy approaches to resourcing, training, student support services, course offerings etc.

In seeking to ensure a nationally consistent approach to the application of the National Training Framework within secondary schools, the IEU believes the following issues are significant:

4.2 Recognising Training

4.2.1 It is important to define the scope of a registered training contract/agreement in legislation in accord with the nationally agreed position. The basis for regulation of such a training contract/agreement should be through three mechanisms:

- training is in accord with approved training which is defined and which has been declared by the relevant State/Territory training authority.
- the contract/agreement requires the involvement of a training provider (Registered Training Organisation) which issues the qualification.
- the training contract is a registered training contract or agreement between the employer and trainee/apprentice which is registered with the relevant State/Territory training authority.

4.2.2 Appropriate State/Territory legislation should define “approved training” as training undertaken in accordance with:

- an existing approved apprenticeship or traineeship as declared by the State Training Authority; or
- approved training where qualifications are recognised in training packages endorsed by the National Training Framework Committee (NTFC): or
- where there is no existing National Training Package for a training scheme, the training agreement/contract should be in accordance with an accredited course defined within the relevant Act [subject to regulation or the relevant State/Territory training authority guidelines to ensure consistency with National Training Framework].

4.2.3 The level of awareness of the major features of the National Training Framework and the ARF arrangements in non-government schools and systems across Australia is uneven. In particular, many school leaders and teachers in most non-government schools have little understanding of the detail of VET in Schools agenda and of the implementation issues set out in the discussion paper. At the school level, expertise is localised to the workplace coordinator or an appropriate person with delegated VET responsibility within the school.

4.3 **Communication Strategy**

The IEU believes that precious public funds and education resources are at best poorly focussed and at worst wasted on ill-defined restructuring, or short term reforms which are not explained well or make little sense to the profession and which confuse the community, and on inappropriate policy shifts which seem to have little purpose other than to give a *raison d'être* for a new Minister following a change of government at federal or state level. This can certainly be said about the training reform agenda over the past 10 years which has been dominated by multiple committees and working parties, changing acronyms and different levels of commitment to the agenda by state and territory governments. This has left the profession fatigued and frustrated, the general community confused and parents anxious about their students education. It has certainly contributed to the current malaise of the profession.

The IEU believes that a comprehensive communication strategy should be developed for schools and school communities by a taskforce which includes the major stakeholders, including school employing authorities, industry representatives, education unions, parents, state training authorities etc. The union believes that at the present time, there is a high level of uncertainty and a lack of commitment felt by most schools, teachers, students and industry about the operation of VET in schools. This is an important issue to be addressed.

4.4 **Curriculum, Competencies & Assessment Issues**

4.4.1 The implementation of VET in schools in line with the National Training Framework and ARM arrangements must occur within the context of the policy goals also in place at the State and Territory level concerning general education.

4.4.2 Recently, some states have conducted reviews of the Senior Certificate arrangements in place, such as the NSW HSC review and the Victorian VCE

review. These reviews support the integration and inclusiveness of VET into the HSC and VCE but barriers remain in most States and Territories regarding the recognition of VET for tertiary entrance (except for embedded vocational elements in Board courses). A comprehensive strategy involving more than curriculum reform is necessary.

- 4.4.3 VET programs should meet AQF criteria and be integrated with the relevant State/Territories Senior Certificate arrangements. They should also meet industry requirements and curriculum support materials should be developed in collaboration with industry. A significant issue is the cost of courses and the infrastructure required for courses to be offered on a school site. The union believes that some vocationally oriented courses are best delivered in specialist facilities such as TAFE and accredited private providers. It is important that there is equitable access to such facilities for non-government students and that any such facilities are accredited and formally endorsed by industry.
- 4.4.4 The IEU believes that the assessment of competency based learning in non-government schools across Australia is still developmental. There are varying patterns of experience and expertise in schools around the country which reflect the take up of this agenda and the commitment of resources and strategic policy development in relation to it. Much of it has been “pilot driven” and undertaken with very few implementation dollars. In general, the underlying knowledge and skills required by teachers in the VET sector and those assessing the embedded vocational elements is similar to the assessment regime in general education. Nevertheless, teacher professional development programs should be resourced to address improving teacher skills in assessing demonstration of competencies and also developing skills for the assessment of competencies on the job.

An important aspect of program content, competency development and assessment concern work placements. These remain a significant factor outside the control of schools and depend upon employers in industry being able to provide and sustain the increasing demand for work placements. The placements are required by the students undertaking vocational courses and by teachers as part of their training to teach vocational courses. Connected with this is the need for teachers to sight and support students during their work placement often during the evening (in the hospitality industry) or during vacation time. The workload issues related to this are significant and require appropriate resourcing.

4.5 **Professional Development, Inservicing & Training of Teachers**

- 4.5.1 The IEU believes that the issue of the provision of appropriately trained and qualified staff, both new and existing, is fundamental to reversing the general lack of confidence which exists in relation to the VET in Schools agenda.
- 4.5.2 In most States/Territories, the availability of teachers to teach dual accredited courses is fragile. The small pool of trained teachers affects the long term viability of course options, particularly if key members of staff relocate and cannot be replaced. The IEU believes it is important to develop a comprehensive recruitment strategy for teachers in vocational areas consistent with the national and state work presently being done under the auspices of the MCEETYA Teacher Recruitment strategy. The union also supports

complementary programs of industry placements for teachers as part of an overall strategy to have appropriately trained teachers. for general and vocational education programs.

Such a comprehensive strategy requires:

- a financial commitment by the funding partners and employers to improve the salary and conditions of teachers generally and a recognition of the specialist expertise required for VET programs, and the restoration of proper salary initiatives for the teaching profession.
- a nationally consistent set of standards for the recognition of qualifications and prior learning, including VET qualifications, requirements for teacher training courses, questions of professional ethics and teacher registration.

4.5.3 The union believes that effective practice exists in various States/Territories and across sectors, of schools with VET programs, working in consortiums linked to a Registered Training Provider, or of networks being established which comprise schools, TAFE, employers and industry representatives. The unions have played a supportive role in these networks, particularly in relation to a number of industrial issues. Such networks and consortiums provide an effective framework for professional development and inservicing programs.

4.5.4 Consultations should also occur with education faculties in Universities regarding pre-service teaching courses to ensure that the VET in Schools agenda has a focus. The recommendations from the recent national project on the Standards and Guidelines for Initial Teacher Education, together with recommendations from various relevant State and Territory bodies (eg. The QLD Board of Teacher Registration and the NSW Ministerial Advisory Committee on the Quality of Teaching MACQT) should be examined.

4.6 Pathways

4.6.1 The union supports the view that fundamental to the Training Reform agenda of the past decade, has been the twin concepts of life long learning and the importance of providing genuine and flexible pathways on an equitable basis to students in post-compulsory education. This includes:

- Planned pathways into apprenticeships, traineeships and higher education courses which provide multiple pathways to employment opportunities.
- Links with and equitable access to TAFE and other registered training providers. Support for the flexible delivery of courses to enhance equity and access.
- Equity of access to courses in rural and regional areas.

4.6.2 At present, considerable disquiet exists with regard to high drop out rates by year 12 students; few clear pathways to training and employment; “informal streaming” on socio-economic, rural and gender lines, and arguments about standards and quality control. The lack of confidence and general confusion about this agenda within both education and industry (and within the parent community) means that much divisive and negative criticism of and by the

various stakeholders is occurring to the detriment of constructive policy development and implementation.

5. INDUSTRIAL IMPLICATIONS

5.1 A number of significant industrial implications must be addressed in the development of a comprehensive strategy for the VET in Schools agenda. These include:

- The spread of hours and general work organisational constraints which operate within schools. Concerns include: split shifts, technical support, health and safety, student and career counselling.
- Legal liability issues.
- Appropriate resourcing for staffing, course development and supervision of students.
- Teacher training and professional development issues.
- Salary classification of industry trainers within the school setting.
- Appropriate industrial and award coverage of students in part-time apprenticeships/traineeships.
- Equity issues.

In particular, the issue of teacher workload in relation to implementing VET programs in Schools must be highlighted.

The organisational and coordination demands not just upon individual teachers and departments but also upon the general operation of a school should not be underestimated. In general, schools are not sophisticated office environments. There may be only one phone available in a staff room, and little in the way of equipment to assist the coordination of a major program of workplacements.

The organisation of a workplacement for one student can require multiple phone calls to various local employers, preliminary visits to that workplace to ensure its suitability, and ongoing follow up of issues raised by both the student and the employer. This must then be multiplied by a number of classes with between 15 – 25 students.

Where apprenticeships/traineeships are in place, the negotiation of appropriate agreements covering wages and conditions, parent meetings, issues of legal liability etc., must be taken into account.

CONCLUSION

Generally, the IEU supports the direction proposed in the consultation document but would urge the development of a comprehensive strategy for VET in Schools which addresses the key issues outlined above.

Attached is a brochure prepared by the IEU in 1997 setting out the views of the union on the training reform agenda.