



About this survey

Welcome to the Qualifications Reform Survey.

The Department of Education, Skills and Employment (the department) is conducting consultations to inform work to modernise training product design, retaining and building upon the existing strengths of the vocational education and training (VET) system.

This survey is targeted towards VET stakeholders involved in the design, development and delivery of national training products, although anyone who is interested may respond.

The purpose of this survey is to seek your views on how new training product design concepts might work in practice.

You may answer all the questions or just those of most relevance or interest to you.

Your feedback will inform advice to Skills Ministers and future approaches to qualification design, and help us ensure we better meet the needs of employers and learners now and in the future.

Before you start the survey – explanatory information

Before you start the survey, please read the explanatory information we have prepared [here](#). This provides background and context on qualifications reform and an example of a new approach to qualification design.

Support to complete this survey

If you need help completing this survey, please email vet-reforms-engagement@dese.gov.au.

Closing date for this survey

10am, Monday 20 September 2021

Save and continue

If you wish, you can complete this survey in stages. Your progress through the survey is automatically saved when you navigate to the next page. You can return to the survey as long as you use the same device and web browser, and have not cleared your browser cookies. To re-access this survey, click on the same link you used initially.

Privacy

This survey may collect personal information, including your name and contact details and any other personal information you volunteer about yourself in the free-text fields. If there is information in your survey response about another individual, you must ensure that you have the consent of that individual to whom the information relates to include it in the survey response. By submitting a survey response, you represent to the department that you have such consent. By submitting a survey response, you further represent to the department that your response does not contain any confidential information about any individual or organisation.

Personal information held by the department is protected by law, including the *Privacy Act 1988* (Cth). Any personal information collected as part of the Survey will be used by the department, and may be disclosed to the engagement hub supplier for the purposes of distributing communications activities, for example if you subscribe to receive email updates, and to administer this survey. De-identified information may be disclosed to State and Territory Governments for the purposes of:

- informing reforms under the [Heads of Agreement for Skills Reform](#)
- informing or contributing to the department's reports or publications

Your personal information will not be used or disclosed for any other purpose unless authorised or required by law.

The department's [Privacy Policy](#) contains more information about how the department manages the personal information it holds, including how to access or correct your personal information and how to make a complaint. A copy of the department's [Privacy Policy](#) can be found on the department's website or by requesting a copy from the department via email at privacy@dese.gov.au.

While we strongly encourage you to participate in the Survey, we understand that you may not wish to. Please indicate whether or not you would like to participate in the Survey through the options below:

If you would like further information or have any questions, please contact us at vet-reforms-engagement@dese.gov.au.

I agree to participate *

- I agree
- I do not agree (if you select this option, you will be exited from this survey)

Thank you for agreeing to participate in the Survey.

Do you agree for your response to be published on the [Skills Reform](#) website? *

Note: The department notes that responses may not be published. Please also note, where the department includes publications on its website, it will be publicly available on the internet, including to individuals located overseas. If you consent to the publication of your survey response, the department will not have an obligation to take reasonable steps to ensure any overseas recipient does not breach the Australian Privacy Principles set out in the *Privacy Act 1988*(Cth).

- Yes - I agree for my response to be published and attributed to me
- Yes - I agree for my response to be published anonymously
- No - I do not agree for my response to be published

Section 1

Information about you

We ask that you provide information about your role or interest in the VET system to help us analyse the information we receive.

1. Which of the following best describes your role in the VET system?

Please select one option.*

- Registered training organisation (RTO), trainer or assessor, or other education provider
- VET expert
- Learner, job seeker or family/carer of a learner or job seeker
- Employer or industry stakeholder
- Government or regulator
- Other

2. (Ask if Q1 = RTO)

Which of the following best describes your role in an RTO or other education setting?*

Please select all that apply.

- VET trainer or assessor (also referred to as VET teacher or VET practitioner)
- VET trainer and assessor working under supervision
- School teacher who delivers VET to secondary students
- Industry professional who also delivers VET training and assessment
- VET language, literacy and numeracy teacher
- RTO manager
- RTO owner
- RTO employee (not trainee/ assessor)
- Other (please specify)

3. (Ask if Q1 = RTO)

What is the size of the RTO you work for?*

- Small (1-99 students)
- Medium (100-999 students)
- Large (1000+ students)
- Unsure
- Not applicable

4. (Ask if Q1 = RTO)

If applicable, in what type of VET setting do you currently work?

Please select all that apply.*

- Community-based adult education provider
- Dual sector higher education provider
- Enterprise – Government
- Enterprise – Non-government
- Privately Operated RTO
- Schools
- Government (e.g. TAFE or Polytechnic)
- Other (please specify)
- Not applicable

5. (Ask if Q1 = RTO)

If applicable, what industry area do you currently deliver qualifications in?

Please select all that apply.

- Agriculture and food processing
- Arts and culture
- Business, Education and Training
- Construction and Mining
- Defence Industry
- Design
- Government, Safety and Environment
- Health and Community Services
- Manufacturing and Engineering
- Retail, Hair and Beauty Services
- Science and Technology
- Sports and Recreation
- Tourism and Hospitality
- Transport
- Utilities
- Other (please specify)
- Not applicable

6. (Ask if Q1 = Employer or industry stakeholder)

If applicable, which industry are you part of or do you represent?

Please select all that apply.*

- Accommodation and Food Services
- Administrative and Support Services
- Agriculture, Forestry and Fishing
- Arts and Recreation Services

- Construction and Trade
- Education and training
- Electricity, Gas, Water and Waste Services
- Financial and Insurance Services
- Health Care and Social Services
- Information Media and Telecommunication
- Manufacturing
- Mining
- Professional, Scientific and Technical Services
- Public Administration and Safety
- Rental, Hiring and Real Estate Services
- Retail Trade
- Transport, Postal and Warehousing
- Wholesale Trade
- Other (please specify) Children's Education and Care
- Not applicable

7. What state or territory do you live in?

- ACT
- NSW
- NT
- QLD
- SA
- TAS
- VIC
- WA
- I don't live in Australia

8. Where are you located?

- Metropolitan Area
- Regional/Remote Area

9. Do you identify as Aboriginal or Torres Strait Islander?

- Yes
- No
- Prefer not to specify

10. Contact information

Please provide your email address at a minimum if you would be willing for the department to contact you to further discuss your responses to this submission (should we choose to do so).

Title Mr

First name Michael

Last name Petrie

Organisation Australian Children's Education and Care Quality Authority

Job title General Manager Workforce, Engagement and Research

Email address [REDACTED]

Australian Children’s Education and Care Quality Authority: submission

Thank you for the opportunity to make a submission to the *Qualifications Reform - Qualifications Design Survey*.

The Australian Children’s Education and Care Quality Authority (ACECQA) is the independent national authority established under the *Education and Care Services National Law* to guide the implementation of the [National Quality Framework](#) (NQF).

The NQF is the national system for regulating approved education and care services, setting levels of safety and quality for all children who attend long day care, preschool/kindergarten, outside school hours care and family day care. The NQF is jointly governed by the Australian Government and all state and territory governments.

The NQF sets staffing requirements for regulated services, including requirements for educators to hold [approved qualifications](#). Based on results of the 2016 National Early Childhood Education and Care Workforce Census, around two thirds of educators working in the sector held a vocational qualification. As such, the quality of vocational education and training is of critical importance.

One of the most significant components of quality children’s education care is a highly skilled, consistent, well-supported and professionally recognised workforce. However the children’s education and care sector continues to experience persistent and increasingly pressing issues with the attraction, supply and retention of educators and, in particular, early childhood teachers. Over the past twelve months, ACECQA, on behalf of all governments has coordinated a co-design process with key sector representatives to develop a ten-year [national workforce strategy](#) to help ensure a sustainable, high-quality children’s education and care workforce. This strategy will be released later this year and is relevant to the broader vocational education and training reform agenda.

If you would like to discuss our responses or would like further information, please contact Michael.Petrie@acecqa.gov.au

Yours sincerely

Michael Petrie

General Manager

Workforce, Engagement and Research

Section A: Proposed qualifications design approach

1. To what extent do you agree or disagree that the proposed qualification design architecture will support stronger skills outcomes for industry and learners, by:

making better use of industry and educator expertise	Neither agree nor disagree
supporting recognition of transferrable skills?	Neither agree nor disagree

ACECQA understands that the current training packages already provide standards for workplace performance which are then used by registered training organisations (RTOs) for training and assessment. However, variations in the quality of training and assessment, particularly in the early childhood education and care qualifications, continue to raise questions about the ability of RTOs to interpret and use these standards.

It is unclear how the proposed qualification design architecture will improve this situation as the proposal relies more heavily on the expertise of individual RTOs to contextualise training programs for specific job roles. This is an area of ongoing concern for the children's education and care sector. Feedback from sector employers indicates that the competency of vocationally trained graduates often falls short of employer expectations, while two separate Productivity Reviews (2011, 2014) have expressed concerns about the quality and variability of early childhood education and care training.

2. To what extent do you agree with the following statements about the proposed qualification design architecture?

a. The national training system would better recognise common skills and deliver vocational outcomes that support individual mobility.	Neither agree nor disagree
b. The national training system would be less complex, delivering relevant information for users in a more accessible format targeted to their needs	Neither agree nor disagree
c. The national training system would support a clearer relationship between training	Neither agree nor disagree

products, industry needs and employment pathways	
d. The national training system would reduce the number of highly similar or duplicative training products	Somewhat agree
e. The national training system promotes flexibility and responsiveness to changing industry needs	Somewhat agree
f. The national training system would facilitate improved articulation and pathways between education sectors	Somewhat agree

3. Are there any other potential benefits that the proposed qualification architecture might provide?

Accessing quality vocationally trained educators is a commonly cited challenge across all provider types. Despite several reforms over the past five years to improve training quality, sector employers continue to report that many vocationally trained educators are still not 'job ready'.

The proposed qualification design architecture aims to improve industry engagement in the development of standards and training requirements. However, it is unclear how this industry engagement will be facilitated. The children's education and care sector is large and diverse. There are more than 7,000 providers approved to operate children's education and care services, and more than four-fifths are small businesses approved to operate a single service. Better collaboration between training providers and employers would significantly benefit the sector, however it would need to be inclusive of all types of employers. The current Skills Organisation pilot for the human services sector may not adequately represent the interests of the children's education and care sector and may not be best placed to be responsible for developing occupational standards for the sector.

Collaboration between RTOs and employers needs to focus on appropriate assessment methods for meeting competency and workplace assessment standards. This would bridge the gap between industry expectations and graduate capabilities and increase employer confidence in the quality of vocationally trained graduates. The ASQA Strategic Review of training for early childhood education and care in Australia (ASQA, 2015) found that around a third of RTOs audited had not validated units of competency related to the qualifications under review or had undertaken validation that was ineffective and/or inadequate to ensure that assessment met the competency standard.

4. To what extent do you think the proposed qualification architecture would face challenges with each of the following areas?

a. Licensing requirements linked to qualifications	Moderate potential challenges
b. Industrial relations / awards	Moderate potential challenges
c. Apprenticeship arrangements	Unsure
d. Industries that require training in specialist skills	Major potential challenges
e. Alignment to the Australian Qualification Framework	Unsure

5. Are there any other potential challenges related to the proposed qualification architecture or suggestions for overcoming identified challenges?

Short duration qualifications, inadequate workplace assessments and poor sector specific knowledge are often viewed as the reason for graduates who are not 'job ready'. Given the proposal to replace units of competency with 'Common Occupational Standards' it is unclear how the proposed qualification design architecture, and the subsequent reduction in specificity within qualifications, would address these issues.

Individuals working in the education and care sector have responsibility for some of the most vulnerable members of our community. Poor quality training potentially places children at significant risk of harm or hazard, or longer term disadvantage if educators are ill-equipped to offer high quality educational programs that enhance and support their learning.

In addition, the children's education and care sector is highly regulated, and both educators and employers have specific obligations under the NQF. Training that fails to meet their legislated obligations puts employers at risk of compliance action for not meeting these obligations.

Section B: Proposed components outlined on page two of the Overview Diagrams.

6. To what extent do you agree or disagree with each of the following statements?

f. Occupational Standards would support industry engagement in the development and delivery of training products.	Neither agree nor disagree
g. Occupational Standards would support industry understanding and recognition of transferrable skills	Neither agree nor disagree
h. Occupational Standards that describe job functions would streamline recruitment practices	Neither agree nor disagree
i. Occupational Standards at the job function level would support stand-alone, 'just-in-time' training	Neither agree nor disagree
j. Common Occupational Standards across qualifications would support recognition of prior learning by training providers	Somewhat agree
k. Training Standards would provide additional support for consistent training and assessment outcomes	Somewhat agree

Section C: Implementation and transition considerations

7. To what extent do you think each of the following would be a barrier to the successful implementation of the proposed qualification architecture?

l. Certain industries requiring highly specific skills and knowledge which can only be developed within that specific industry sector	A considerable barrier
m. Change fatigue – many changes to the broader VET system	A considerable barrier
n. Cultural/attitudinal shift that would be required by key stakeholders in the VET system	A considerable barrier
o. Challenges in workforce capability or capacity (in employers, training product developers, RTOs) or supporting resources to successfully deliver the proposed reforms	A minor barrier

8. Are there any other barriers to implementation that might exist?

The most recent review of the children’s education and care training package qualifications commenced in 2017 and was endorsed by Skills Ministers in June 2021. As part of the review, several key changes have been made such as strengthened assessment requirements, increased work placement hours and new entry requirements for the Diploma of Early Childhood Education and Care. Significant changes to the structure, content and intention of these qualifications in the short term may be resisted by key sector stakeholders, who have invested time and effort in the development of the new training package.

It is unclear what the timeframes for implementation of the proposed qualification design architecture will be, however already change fatigue among RTOs is reportedly high. This could significantly impact the training sector’s capacity to support and appropriately implement the proposed qualification design architecture.

9. If the proposed qualification architecture were to be adopted, what do you think would assist with implementation or transition? You might like to consider what tools, resources, guidance, communication, and timeframes would be appropriate.

Employment projections published by the National Skills Commission predict that growth in the children's education and care sector will continue to increase over the next five years with employment expected to increase by around 16,000 educators (an 11% increase), well above the national projected employment growth of 7.8% for all occupations. There would need to be firm consideration given to transition and implementation timeframes to ensure the significant and increasingly urgent workforce challenges experienced by the sector are not further exacerbated.

Any changes to the vocational education and training system that intentionally, or inadvertently, form a disincentive to commence or complete further study, will negatively impact the ability of the sector to provide education and care for children, which brings with it broader workforce participation and economic recovery concerns and implications. Thorough consultation with the children's education and care sector will be required to ensure the proposed qualification design architecture is fit-for-purpose, flexible and responsive.

ACECQA has well established relationships with key sector stakeholders as well as existing consultative channels for workforce and qualification issues affecting the children's education and care sector, such as the co-design National Workforce Strategy Stakeholder Reference Group, and would welcome the opportunity to provide feedback on further aspects of this reform and the broader vocational education and training reform agenda.