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ACTU Submission to the *Quality of Teaching in VET: options paper*

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Introduction

1. The ACTU welcomes the opportunity to make a submission to the *Quality of Teaching in VET: options paper*.
2. As the paper notes, the VET system has a crucial role to play in delivering training and skills to an increasingly diverse range of learners. For example, it provides entry-level skills training for those entering the workforce for the first time or who wish to move into a new field; it provides foundation skills training for those who need the employability skills, and the language, literacy and numeracy skills, that will better prepare them for the world of work; and it provides more advanced skills training for those who wish to build on their existing qualifications and move into more highly skilled, highly paid jobs. Of particular note is the role the VET system plays in providing 'second chance' training for disadvantaged groups, and more generally for those who may not have the aspiration or interest in undertaking a university education.
3. Governments at all levels have recognised the importance of the VET system in providing these skills and its key role in improving both workforce participation and workforce productivity. To this end, the Council of Australian Governments (COAG) have established a number of targets to improve the level of skills across the workforce. These include:
 - halving the proportion of Australians aged 20-64 who do not have a qualification at certificate III or above by 2020; and
 - doubling the number of higher VET qualification completions (Diploma and Advanced Diploma) by 2020.
4. If these targets are to be met, VET provision will need to expand significantly. Skills Australia, the body responsible for providing skills advice to the Australian Government, has calculated that to meet these and other targets there will need to be a 3% increase in the number of VET enrolments annually each year to 2020.

5. The critical point of relevance here is that these challenges cannot be met without a VET workforce that itself is well-trained, well-skilled and well-qualified, both in terms of the necessary subject knowledge and industry know-how, and the requisite teaching skills to teach that content. This is reflected in the current attention and focus being placed on VET workforce issues in a number of forums, including the current Productivity Commission study, the work of Skills Australia in this area, and various projects run under the auspices of the National Quality Council.
6. This project on the quality of teaching in VET forms an integral and timely part of this debate around the future regulatory framework for the VET workforce.

Overall comments

7. The ACTU congratulates the LH Martin Institute on the quality of the options paper and supporting documents. The range of issues and options presented in the paper provide a comprehensive picture of the challenges and opportunities that lie ahead for the VET workforce, and the areas where policy and regulatory reform can make a difference in improving the quality of VET teaching.

Casualisation

8. In response to the request to identify elements that may have been 'missed', one issue that could warrant further attention in the final report - although we note it was dealt with in some of the background papers - is the extent of casualisation in the VET sector, and the implications this has for the quality of VET teaching.
9. Figures show that almost half (46.8%) of the total national TAFE workforce is employed on a casual or contract basis. Among VET practitioners generally, the share of casual or contract employees rose to 56.8% and was even higher for females at 62.2%. The trend is becoming more pronounced over time. The proportion of practitioners employed full-time decreased between 2002 and 2008 for every state and territory where comparison was possible.¹

¹ Guthrie, H., Mlotkowski, P., and Nechvoglod, L, National TAFE Workforce study 2008, NCVET, p. 31 in Guthrie, H., (ed) (2010), Vocational education and training workforce data 2008: A compendium, NCVET.

10. As is pointed out by some analysts, the use of casual employment can be interpreted as a positive sign in some respects. It can be that VET practitioners work on a casual basis as a VET teacher or trainer, while their main employment is in industry. However, the available data suggest that most casual employment in the sector is not truly casual in nature, with 75% of non permanent staff having been employed for longer than one year and more than one third having been there for more than five years².
11. Overwhelmingly, the evidence is that continuing casualisation of the VET workforce is a matter of concern, not a trend to be welcomed. Across the workforce generally, there is a large body of research which points to the precariousness of most casual employment, characterised in terms of low pay, lack of standard employment rights and entitlements and high levels of insecurity³.
12. A particular concern in the context of this project is that casual employees in the VET workforce are disadvantaged in terms of the training and professional development they receive. For example, a study by Harris ⁴ found that the degree to which permanent, contract and casual staff had access to and participated in staff development differed greatly, with providers generally favouring permanent staff. Permanent staff were provided with more support in terms of paid time for training, the cost of books, materials, and attendance fees. Casual and contract staff, by contrast, were often left to organise their professional development themselves, undertake it in their own time, and had less access to training needs analyses and skills audits.

² Guthrie, H., Mlotkowski, P., and Nechvoglod, L, op. cit, p.41

³ see for example Campbell I. Whitehouse G; and Baxter J (2009) 'Australia: Casual employment, part-time employment and the resilience of the male breadwinner model in L. Vosko, M' McDonald and I. Campbell eds., Gender and the Contours of Precarious Employment, London, Routledge, 60-75.

⁴ Harris, R., et. al (2001), The changing role of staff development for teachers and trainers in vocational education and training, NCVET, p. 8.

13. As noted above, the nature of the VET sector can make it conducive to some degree of casual employment. However, the extent of casual employment at present is not a sustainable way to continue. Given the fact that many casuals have been employed for a number of years, the option of permanent full-time or permanent part-time employment should be the preferred response. One mechanism to address these issues is through casual conversion clauses which can be included in awards or agreements through consent arrangements or the bargaining process to give 'long-term casuals' the option to convert to permanent employment. There is also the need to address larger structural funding issues, recognising that casual employment is often also a response to pressures on staffing budgets.
14. Where casual employment does continue, it should not be a barrier to receiving equal access to appropriate CPD opportunities. The final report could deal with these issues more prominently.

National Workforce Development Strategy

15. The ACTU also considers there is an opportunity to combine all the elements of VET teaching outlined in the paper into a national workforce development plan for the VET workforce as a whole, just as other sectors that rely on VET training are being encouraged to do for their own workforces.
16. The thinking behind a national workforce development strategy is that workforce planning will continue to be done at the individual provider level in terms of their own recruitment, retention and retraining strategies. Individual providers should be encouraged to take their own workforce development approach in partnership with their employees, local unions and RTOs, using mechanisms such as skills audits to assess what can be done to improve workforce capability. Existing funding sources for workforce development may be available for this purpose.

17. However, strategies at the individual provider level need to be part of a co-ordinated plan across the sector that is developed collaboratively between government, industry – including unions, employer groups, and relevant industry skills councils - and providers. This recognises there are common workforce challenges facing public and private providers across the sector and a national workforce development plan would allow for a full picture of the factors influencing the sector as a whole to be developed and guide the skill needs of the future VET workforce. While workforce development has been identified as a state responsibility, it is important that a national approach is taken.
18. To this end, a workforce development strategy for the VET workforce has already been recommended by Skills Australia in its workforce futures report, with proposed funding of \$40 million per annum over six years. This important proposal would be given further impetus if taken up by this project in the same or similar form.
19. Key elements of such a strategy identified by Skills Australia include:
- higher quality data and information about the VET workforce;
 - a suite of qualifications that reflect the diversity of the sector to ensure that qualifications are fit for purpose and regular audits to ensure that training providers offering these qualifications are competent to do so;
 - accreditation of teachers and assessors including a requirement for continuing professional development; and
 - appropriate financial investment in teacher development⁵.
20. The ACTU supports the inclusion of these issues and other elements identified in the options paper as a good starting point for future discussions around a national workforce development strategy. They go to the heart of increasing the quality and professionalism of the VET workforce, and should also help towards improving the attractiveness of employment in the VET sector.

⁵ Skills Australia, Lifting Quality in Training, Communique following the Second Strategic Industry Forum, 20 November 2009

The role for a professional association

21. Finally, there are a number of references in the paper to the value of having a professional body to represent the views of the profession and develop standards that form the basis of good teaching practice.
22. The ACTU strongly supports the need for a professional body that performs these functions, but makes the point that this is a role that should be, and is already, performed by the unions that represent the industrial and professional interests of teachers in the sector.
23. Further comments in relation to particular sections of the options paper are provided below.

The structure of the VET teaching workforce

24. The options paper explores an approach where expectations placed on teachers and trainers respectively could become increasingly differentiated, with teachers to focus on obtaining higher level pedagogical skills and qualifications while workplace trainers and assessors are employed more for their technical, industry currency with less attention paid to pedagogy.
25. While there is a case for distinguishing between these groups at some point in terms of the type and level of qualifications they are required to undertake, it is important to determine where this point lies.
26. These are not straightforward questions, but the aim and expectation initially should be to ensure all teachers, trainers and assessors have a basic common set of professional, pedagogical skills obtained through an appropriate entry-level qualification. (The profession itself is ultimately best placed to answer, with industry input, the question of how much difference there should be in the pedagogical skills that are required by different types of VET practitioners at entry-level). It is at this point, beyond the entry-level qualification, where there can be greater focus on pedagogic content knowledge, and the specialist, differentiated skills and requirements of different VET practitioners. However, at entry-level, the concept of a shared base of knowledge is worth retaining.

27. The ACTU sees merit in the idea of specialised qualifications to reflect the level of responsibility, such as the distinction made between full teacher and associate teacher in option 2 on p. 10. Again, these specialised qualifications should sit on top of a reasonably generic entry-level qualification that covers all VET teachers. The challenge will be to ensure there is some process to encourage ongoing skills development and further qualifications. This is where industrial relations arrangements, particularly skills-based classification structures, play a role. Registration requirements could have a similar impact in encouraging ongoing skills development.
28. In summary then, the ACTU position is perhaps best seen as a combination of the options on page 10. There is merit in distinguishing between teachers on the one hand, and workplace trainers and assessors on the other, and between different categories of teachers. However, this could best be done on the base of a common requirement for all VET practitioners to have an entry-level qualification around certificate IV. As the paper points out, this should be at a sufficient level to ensure those who do not go on to further qualification still have the knowledge and skills they need. There should then be encouragement to undertake further skills development and qualifications beyond these basic foundation skills, with reward and recognition for higher levels of skill and competence.
29. These issues are explored further below under VET teacher preparation and development.

Recruiting and retaining teachers

30. To counter the impact of an ageing VET workforce nearing retirement, a mix of attraction and retention strategies are required. Improving the professional status of the workforce through a renewed focus on the quality and level of teaching qualifications in the sector is one key mechanism. Improved access to professional development is a key related issue.

31. Ongoing improvements to wages and conditions must be a part of that equation (although they may be seen to fall outside the scope of this project). VET practitioners should expect to be paid well commensurate with their qualifications and experience and in keeping with their professional status.
32. The ACTU strongly supports the important point made in the paper that future recruitment and retention of VET teachers will require career structures that offer employment security, career progression, appropriate levels of pay, and supportive work environments.
33. The framework of industrial awards and agreements that applies to the VET workforce performs a vital role in providing access to skill based career paths across the industry that link salary progression to improvements in formal qualifications and improvements in skills acquired and utilised in the workplace.
34. Collective bargaining where VET practitioners have the right to be represented by their union in negotiations with their employer continues to provide the best vehicle for addressing issues of productivity and service delivery and providing fair and reasonable wages and conditions across the profession, and is recognised as such under the Fair Work legislative framework. By contrast, individual performance pay has been tried many times in the past in different teaching environments and jurisdictions, without achieving the benefits its advocates have promised⁶. Such schemes have often shown to be divisive and counter-productive, and are based on a misunderstanding of what motivates teachers⁷.
35. The focus instead should be on standards-based pay improvements, which provides reward and recognition for improvements in teaching knowledge and practice. In 2007, the Australian Council for Educational Research identified the circumstances where such schemes are likely to be successful and achieve genuine commitment and support, including⁸:

⁶ see J.Isaac, Performance-related pay: the importance of fairness, *Journal of Industrial Relations*, vol. 43, issue 2, pp. 111-123

⁷ see Dinham, S., "The merits (and complexities) of merit pay" 18 November 2006, <http://www.news.ieu.asn.au/796.html>

⁸ (ACER (2007), Performance Pay for Teachers,

http://www.dest.gov.au/sectors/school_education/publications_resources/profiles/research_on_performance_pay_for_teachers.htm

- when their guiding purpose is to give substantial and valued recognition to teachers who provide evidence of professional development to high teaching standards:
- the standards have been developed by expert teachers and provide long-term goals for professional development;
- teachers have adequate opportunities to learn the knowledge and skills required to put the standards into practice;
- a teacher's ability to demonstrate they have met the relevant standards leads to valued professional recognition, enhanced career opportunities and significant salary increases (and not one-off bonuses); and
- assessment processes are in place that ensure reliability, comparability and fairness in determining whether teachers have met those standards.

36. The development of any such standards-based pay schemes must be negotiated with teachers and their unions and reflected through appropriate collective industrial instruments. Additional government funding is also required to support any such schemes.

37. In response to options raised in the paper, the ACTU supports the concept of the master practitioner/master teacher role, although it needs to be supported by appropriate industrial relations arrangements that recognise the level of expertise required for the role. The ACTU supports the role given to ISCs under options 2 and 3.

38. The idea of promoting teaching as a career stream within an industry also has merit, and is working already as a viable option for older workers in an industry who are interested in taking up teaching, training and assessment roles. This is something that has benefits for both the individuals concerned who are provided with new career pathways, the students who receive the benefits of this industry experience, and the quality of the broader VET workforce.

39. For example, in South Australia a mature aged worker transition project jointly funded and managed by the State Government and local industry skills boards has delivered training for tradespeople in the electrical, transport and distribution, and construction industries to become trainers and workplace assessors. The initiative has proved successful with high completion rates for the training that was delivered, as well as new employment opportunities for older tradespeople⁹.
40. There would be merit in extending the reach of such programs, including at a national level. In this respect, we also note that the report recently handed down by the National Resources Sector Employment Taskforce has recommended more be done to encourage this pathway¹⁰.
41. The cross-sectoral teaching roles are potentially more problematic, and would require further examination. For example, it is not clear who the employer would be, and the concern is that the person in the role becomes akin to a casual employee holding multiple jobs. It is not clear how workload issues for the employee as they move between the different sectors and employers would be resolved. Each sector has its own distinct nature and pedagogical challenges and cross-sectoral teachers would need to be appropriately supported and trained to handle those different roles.
42. Finally, the ACTU supports the call for more and better data on the VET workforce. The NCVET, Skills Australia and others have highlighted the difficulty of getting accurate information for the VET workforce at present, on topics such as movement in and out of the sector, the career paths of VET staff and their qualifications, salaries and working conditions. Problems identified include numbers not being reported consistently or comprehensively, and discrepancies across different studies. Even in the TAFE sector there is no regular consistent national collection of workforce data.¹¹

9 <http://www.saworks.sa.gov.au/Portals/0/27-5%20Mature%20tradies.pdf>
www.bsisb.com.au/docs/page/106/article.8/Mature_Workers_Initiative.doc
<http://www.bsisb.com.au/cgi-bin/page.cgi?id=136>
http://www.constructionskills.com.au/wise_guys.cfm

10 Resourcing the Future, National Resources Sector Employment Taskforce July 2010

11 Guthrie, H., Mlotkowski, P., and Nechvoglod, L (2010) p. 30.

43. The fact there is no targeted and consistent collection of data on the VET workforce is a limiting factor in being able to conduct any meaningful workforce planning at a sectoral level and needs to be addressed. The ACTU supports the needs for better quality data on the VET workforce as a key component of a national workforce development strategy. A combination of an administrative collection using information already collected by providers, and a direct survey of employees is one option to explore.¹²

VET teacher preparation and development

Skills and qualifications

44. As this submission has emphasised, the VET workforce has a central role to play in delivering the skills training required to build a more skilled and productive workforce, to raise the number and level of qualifications obtained through the VET sector, and to improve the workforce participation rates of those currently unemployed, or only marginally attached to the labour market.
45. It is essential that the VET workforce is supported in these endeavours with an appropriate grounding in the pedagogical skills required to deal with the diverse learning environment of the VET sector, and the opportunity to develop these skills on an ongoing basis. Only then can teachers expect to get the most out of the industry knowledge and experience they often bring to the role.
46. Effective teaching, training and assessment relies on an extensive professional knowledge basis. As Clayton observed, teachers who reported they felt well prepared in their first year of teaching had completed courses that gave them deep knowledge of what they were expected to help students learn, the skills and knowledge of how to teach, how to teach content, and how to assess and how to plan¹³. A point well made in the options paper is the importance of pedagogical content knowledge, in particular.

¹² Guthrie, H., (ed.) (2008) VET workforce data 2008: a compendium, p. 12, NCVET.

¹³ Clayton, B., (2009), Practitioner experiences and expectations with the Certificate IV in Training and Assessment: A discussion of the Issues, NCVET p. 16.

47. Unfortunately, this model of preparation has not always been the reality, and there have been well-documented concerns for a number of years over the standard of initial and ongoing VET teacher training; concerns which continue to be expressed.
48. The concerns centre largely on the adequacy of the certificate IV Training and Assessment qualification in its various guises since the original training package in 1998, and whether it is a sufficiently robust minimum qualification for those responsible for building the skills and knowledge of the Australian workforce.
49. This is not about suggesting that every VET teacher must do a three year degree before they start teaching. The ACTU recognises that any framework for VET teacher qualifications must be developed taking into account the realities of the VET environment, where much of the VET workforce comes directly from industry and will therefore often start their VET employment with strong industry experience and qualifications, but not the corresponding teaching skills. It is important clearly for this strong connection between industry and the VET sector to continue, and this means VET teaching qualifications will by necessity need to be integrated with VET employment, and not necessarily precede it, as new VET staff gain their teaching qualifications once employed.
50. However, conversely, it is not acceptable that a qualification completed in five days or less is the extent of formal teaching qualifications that the workforce is required to have in order to become and to continue to be a VET practitioner. Moreover, it appears that even though the Certificate IV has become the de facto minimum standard, many VET practitioners do not even hold this minimum qualification. It has been estimated that 90% of practitioners in private providers, outside TAFE, hold no qualifications in training and 60% in TAFE do not have qualifications.¹⁴
51. For a sector that prides itself on its quality and professionalism and which is responsible for the quality of vocational skills training that is provided to the rest of the workforce, the current situation needs to be improved.

¹⁴ Guthrie, H., and Mlotkowski, P., (2010), op cit, p. 26

52. On that basis, the ACTU provides general support for the model put forward in the options paper, based around an induction program before starting teaching, an entry-level qualification upon commencing teaching, and higher level qualifications as they progress.
53. The introduction of a pre-employment induction program would be an appropriate recognition of the way that new staff generally enter the profession, as described above. It is important the content of such a program is properly accredited and can count as credit towards the completion of subsequent qualification (s).
54. The induction program should also cover the policies and practices of the VET sector as a whole, as well as the employing institution.
55. In further developing this model in the final report, we also endorse for consideration the work done by the AEU in this area. The AEU proposal, outlined in further detail in their submission, is for an integrated three phase approach to VET teacher qualifications linked to different AQF levels - starting with a qualification at least at certificate IV level – and underpinned by agreed professional standards developed by the profession.
56. The key point is that the certificate IV must be seen as an entry-level qualification - the foundation for future professional development and qualifications – and not the end point for a fully qualified VET teacher. Capability development needs to be seen as an ongoing process, from commencement of employment and at important threshold points during professional careers. There is a need to look at more advanced qualifications at Graduate Certificate or Diploma level and the ACTU endorses the submissions made by the AEU for a three phase approach as described above.
57. The ACTU notes that there has also been and continues to be a great deal of work done on the latest iteration of the training and assessment training package to address some of these issues, but there is still scope for the process of continuous improvement to be applied to the certificate IV qualification and the training package as a whole.

58. As noted above, it is clear that many VET teachers come to the profession with their industry experience and qualifications, without necessarily having any formal teaching qualifications. This will always be the case as VET providers look to attract new staff with industry links. However, this is not a reason to remove or reduce teaching standards. It should become an accepted part of their initial training and professional development that new staff undertake appropriate qualifications (The one exception would be the genuine, visiting industry expert who joins a class irregularly and is under the direction of the VET teacher, although an induction program would still be beneficial for this group). This may require a cultural shift as well as further possible regulatory measures.
59. We note also the concerns about barriers to entry and ensuring that industry experts can make a contribution to the VET workforce, but emphasise again that it is not acceptable to have a declining importance placed on the level and quality of qualifications required to teach in the VET sector. A framework along the lines proposed by the AEU, or the model proposed in the options paper, should be seen, not as a barrier to entry, but a vital ingredient in improving and promoting the quality, status and professionalism of the VET workforce.

Continuing professional development

60. The teaching qualifications framework proposed by the AEU makes important provision for ongoing professional development. This recognises that while there will always be many in the sector with an intrinsic motivation to improve their skills and capabilities and seek out opportunities for professional development and maintaining their industry currency, this also needs to be provided for and encouraged in a formal, structured way.
61. To this end, the ACTU supports the position of the AEU that professional development should be based on accredited modules which contribute to the completion of the initial qualification and higher qualifications. This recognises again that teaching qualifications have to be acquired on the job and linking professional development to a qualification can make the activity more purposeful.

62. The vision for CPD articulated in option 3 is one which the ACTU supports, and would form an important part of a national workforce development strategy for the VET workforce raised earlier.
63. As noted above, the poor access of casuals to CPD should be a matter for this project to consider further in its final report.

Maintaining and extending industry currency

64. Maintaining and strengthening links with industry should be another important focus of professional development activities. There is generally consensus on the importance of measures such as industry placements, and staff interchanges. However, there would be benefit in getting a clearer picture of how prevalent they are, where they work well and where they don't, and what could be done to improve access to them. The concept of using industry placements to develop new teaching and learning strategies and resources is supported.
65. One obvious reason why industry placements are not all that widespread may be the cost of the employee leaving the workplace. This is an issue which needs to be addressed through funding to support dedicated release time and should form part of a broader workforce development strategy. There may also be a role for Industry Skills Councils in brokering and co-ordinating industry placement opportunities.

Registering VET teachers

66. In regards to registration, there are a range of views with some not convinced of its merits given the diversity of the workforce, and the distinct nature of the sector compared to schools for instance. For its part, the ACTU has an open mind on this issue as one worthy of further consideration as part of the framework for increasing the status of the VET workforce. Registration through the relevant professional body would be the preferred option, within a framework that acknowledges the particular nature and circumstances of VET teaching. Again, we refer to the submissions by the AEU on this issue.

Evaluating the quality of teaching in VET

67. It is vital that any data used to evaluate the quality of teaching in VET is valid, reliable, and fit for the purpose. Ultimately, the ACTU supports the aspiration for teaching performance to be assessed against standards developed by the profession.

Conclusion

68. There are major challenges ahead for the VET sector, and until recently there has been insufficient attention on how the VET workforce itself is placed to respond and meet these challenges.

69. The work of this project is a positive initiative to identify the issues which are central to improving the skills and capabilities of the VET workforce and set out the options for reform.

70. At this stage, the ACTU puts forward the following priorities for further action:

- the development of a national workforce development strategy for the VET workforce that includes an allocation of adequate resources for ongoing professional development, and for the development and maintenance of close links between teachers, providers and industry, support for sharing and diffusion of good practice, as well as more and better data on the VET workforce;
- the development and promotion of appropriate high level VET teaching qualifications and professional development for VET teachers, as part of a strategy for re-professionalising the VET workforce;
- Measures to address unacceptably high levels of casual employment within the VET workforce, particularly in TAFE; and
- A recognition of the continuing role of collective bargaining as the primary means by which improvements to wages and conditions, including enhanced professional career paths, can be negotiated with the VET workforce and their unions.

71. The ACTU supports the submissions of its affiliated union, the AEU, and we commend them also to the review.
72. The ACTU looks forward to the final report.