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Dear Leesa,

Thank you for the opportunity to comment on your paper "The quality of teaching in VET: options paper". We are impressed with and pleased to see the extensive work that your project has produced to date, and hope that our comments can make some useful contributions to the final recommendations from your project.

The authors of the attached submission are those of us who have significant teaching and coordination roles in the VET teacher education courses - Bachelor of Education in Adult Education and the Graduate Diploma in Adult Literacy and Numeracy Teaching - at the University of Technology, Sydney.

Please feel free to contact any of us should you have any questions about the content of our submission.

Yours sincerely,

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Introduction

Overall, we think that the report is impressive in its understanding of the needs of the sector: its recommendations, particularly being 'staged', are feasible and proactive. If/when realised, the proposals will have a big and positive impact on teaching and therefore learning. The report's recommendations receive our strongest support.

Responses to questions for consultation

Question 1: do you believe that current arrangements for assuring the quality of VET teaching are satisfactory?

Needless to say, quality assurance of teaching is a complex issue. Currently, much of the quality assurance appears to rely on measures established for both internal and external auditing. While we recognise the importance of an appropriate level of reporting for the purposes of accountability, we do not believe that these measures are necessarily informative about the quality of teaching.

The quality measures that are currently utilised only pay lip-service to the actual classroom/workshop and the activities that occur in them. Most of the quality measures are concerned with outcomes rather than the actual process of teaching/learning. The current TAA/TAE qualifications for VET practitioners do not require any substantial long-term observations of classroom/workshop/laboratory practices; they only tend to look at assessment outcomes and perhaps 'reaction evaluations' from learners which do not actually focus on learning issues. The current quality measures also do not examine the students who do not complete vocational programs; which is the vast majority of them and hence the appropriateness of teaching/learning activities is not assessed in any rigorous way. Trainee school teachers undergo extensive classroom observations over an extended period of time both by their practicum supervisors as well as their supervising classroom teachers. The contrast with vocational educators in RTO's could not be more stark as they are often placed in charge of classes/workshops with only a few days of training which seldom involves supervised practicums.

We would like to see VET teachers to be properly afforded the status of professionals who have the skills, knowledge, and resources to exercise agency and judgement to shape their own teaching and the practices of their working community in ways that continue to improve the quality of teaching and learning in their courses. This requires an expectation of reflective practice; however, we do not believe the current working conditions and the qualification levels of VET teachers adequately support this. In NSW where most of our VET teachers work, the professional development allowance for beginning TAFE teachers has been reduced from two days a week down to two hours a week, and the base line qualification has been dropped from a university teaching degree to the Certificate IV in TAA.

We also believe that the current high level of casualisation of VET teaching, combined with contestable funding in many areas makes it difficult to monitor and improve quality of teaching in any meaningful and sustained manner. In order to improve (or indeed gain a useful picture) of VET teaching, the career structure of the VET workforce and the funding regime that enables a career structure need consideration alongside the elements examined in this Options paper.

Upon this, all else rests. VET teachers need to be AT LEAST as well qualified as their school-teacher counterparts. Some learners in the VET sector have already 'failed' in the school system; many have experienced disadvantage, sometimes multiple disadvantage in their lives; and yet other learners enter the sector well-equipped and ready for study. All have potential to succeed both personally and in making a contribution to national productivity. It takes a highly-educated teaching profession to address this range of needs: to cater for the high achievers as well as for those who face challenges in their learning. It also takes teachers who have agency; can exercise professional judgement; can articulate how and why good teaching works. In the current Australian system, degree-level study is what provides a connection between practical and theoretical understandings of teaching. It is only

this level of study which systematically links 'what my experience tells me' with 'what others have found out', in ways which leads to critical and evaluative teaching practices.

Question 2: To what extent do the options outlined here allow teachers, RTOs, and/or VET more broadly to build on existing processes to improve and ensure the quality of VET teaching?

Element	Preferred option	Comments
1. The structure of the VET teaching workforce	Stage 3	<p>Setting different requirements for different VET groups of practitioners according to differences in the nature and levels of teaching activities is appropriate.</p> <p>Structure should also be considered in relation to forms of employment. We do not believe that the current levels of casualisation and short term contracts provide a good basis for addressing quality issues in teaching.</p>
2. Developing master practitioners	Stage 3	<p>We support the identification of a 'master practitioners' as a category of people who can make a significant contribution to VET teaching.</p> <p>In addition to Government and industries, relevant trade unions should be included in taking responsibility for master practitioner streams.</p>
3. Cross sectoral teachers	Stage 3	<p>Cross-sectoral teaching is a category of work that is useful to highlight here. The industrial implications for cross-sectoral work must be considered more closely together with questions of qualifications, professional development etc for this group of workers. For example, for those teaching in the higher education programs, greater protection of academic/ intellectual freedom is needed in order to genuinely engage their learners (and themselves) in critical inquiry of their subject areas, as would be expected in higher education courses. They would also be expected to exercise greater autonomy in curriculum development, and this should be reflected in their workload.</p> <p>The VETiS sector is particularly problematical for VET practitioners as it involves a sector which operates on a very different set of assumptions and pedagogical practices from the traditional VET sector. There appears to be few providers of VET teacher education providing specific tailored training for VET practitioners who want to teach in this sector and this sector is not covered well by the Cert IV in TAA/TAE. The need for specialised training for this sector is paramount given the change of school leaver age and the push by governments to increase the amount of VET delivered by our school system.</p>
4. Staff data collection		<p>We do not support data collection for the sake of data collection, and we do not believe the use to determine eligibility for the 'quality skills fund' is a sufficient reason for this. We are also sceptical of a MySkills website, if it is anything like the MySchools website which invites simplistic ranking of schools and other misunderstandings.</p> <p>We believe that clear criteria be set (by the professional accreditation body) in terms of:</p> <ul style="list-style-type: none"> • a stable (ie continuing) staff levels in the vocational areas that the RTOs teach • a criteria-based limit on the use of casual teaching staff • a minimum baseline qualification level for different categories of VET practitioners <p>and ensure that all RTOs that are recipients of public VET funding meet these criteria. Thus, RTOs would need to report on their workforce data in order for there to be a check against these criteria. Who has access to these data need to be thought through more closely.</p>

Element	Preferred option	Comments
5. Entry level teacher qualifications	Stage 3	As mentioned above, we would like to see VET teachers to be properly afforded a professional status, and to achieve this, a qualification commensurate with other education professionals, eg school teachers is necessary. This would also provide VET teachers with the opportunity to model the life long learning journey that is encouraged through the development of cross-sectoral learning pathways.
6. Mentoring and supporting new teachers	Stage 3	We strongly support the establishment of a VET teachers' professional association. For the large number of VET teachers who do not come from a teaching background, such an association could help to strengthen their professional identity as teachers. Further thought is needed on whether it is one overarching VET teachers' professional association that is needed, or a number of them according to vocational areas is a subject of further discussion. A relationship of this association with AVETRA would be desirable in ensuring that VET research informs and supports the work of the new association(s).
7. Continuing teacher education qualifications	Stage 3	Additional advanced qualifications in the specialist areas of work such as VETiS and teaching 'foundation skills' should be available. However, there may also be initial teaching qualifications that directly train teachers into such areas – eg a B Ed that focuses on adult language, literacy and numeracy (as exists at our university).
8. Continuing professional development	Stage 3	We believe there are two kinds of inter-related professional development programs that are needed. One is the professional development of the VET teachers 'as teachers' - it programs that develop the teachers' professional identity and expertise as teachers. The other area of professional development is in the teachers' specialist areas of teaching, and there is a role for relevant industry/ professional organisations and higher education here. Periods of secondment/ study leave back in industry for teachers in the vocational areas, and in higher education for teachers teaching in areas such as foundation skills should be considered as aspects of the collaboration between the RTOs and external bodies.
9. Maintaining teachers' industry currency	Stage 3	We see this as an aspect of the continuing professional development
10. Research on VET pedagogy and models of teaching		We support the promotion of scholarship of VET teaching, and a centre with attached funding which also has a coordination, clearing house and networking role would be desirable. However, the relationship between NCVER, AVETRA and the VET teachers' professional association needs to be thought through carefully to avoid unhelpful overlap or competition for resources.

Element	Preferred option	Comments
11. Accrediting qualifications		<p>We believe that accreditation of the VET teaching qualification for teachers with substantial teaching roles (and here we are assuming that this be restored to higher education degree qualifications) would be a helpful way forward. The model for this process and the accreditation body would need further discussion.</p> <p>However, a model such as what is employed by Engineers Australia, where there is an accreditation cycle of x years, and where an accreditation panel consisting of engineering academics from other institutions and representatives from the Engineers Australia conduct the accreditation process for each university offering an accredited engineering course could be considered. The accreditation process involves course documentation as well as discussions with the higher education management and faculty staff and students, and examination of sample students' work and course materials. On that basis, Engineers Australia provides a report, including any problems and a timeline for addressing them. This approach based on 'peer review', involving higher education academics supports dissemination of good practice and innovation.</p> <p>The accreditation model should include specifications about:</p> <ul style="list-style-type: none"> • course outcomes/ graduate capabilities that again should be developed through consultation with higher education providers, VET providers, Government, industry peak bodies, broader community stakeholders, students and unions (see for example the process used in the 1996 National Review of Engineering Education) • the length and nature of any teaching practicums required • staffing capabilities of the faculties as well as staffing levels • what is required for VET practitioners to be registered (if registration of teachers is to be adopted) <p>Such a model would also give greater guidance to and place the onus on the universities about sustaining the range of expertise and staffing levels in VET teacher education.</p>
12. Registering VET teachers	Stage 3	Registration may be desirable for those VET teachers working in public educational institutions. However, this should follow a successful implementation of the accreditation process.
13. Evaluating the quality of VET teaching	Stage 3	We would support peer evaluation, student evaluation developed in consultation with the teachers, students, and the teachers' union(s), as well as research of longitudinal nature that seriously examines the impact of VET learning from both the human capital and social inclusion angles.

Question 3: do you find helpful the paper's presentation of options in stages: stage 1 – the augmented status quo, stage 2 – intermediate enhancement, and stage 3 – ambition?

The presentation of options in stages is helpful. It is our view that across most of the elements it is stage 3 that needs to be achieved. We are not sure if the intention is to go through stages 1 and 2 before reaching stage 3. A timeline should be set for achieving stage 3 for each of the elements, accepting that the elements are interdependent.

Question 4: do you find helpful the paper's analysis of VET teaching into elements –

1. The structure of the VET teaching workforce
2. Developing master practitioners
3. Cross sectoral teachers
4. Staff data collection
5. Entry level teacher qualifications

6. Mentoring and supporting new teachers
7. Continuing teacher education qualifications
8. Continuing professional development
9. Maintaining teachers' industry currency
10. Research on VET pedagogy and models of teaching
11. Accrediting qualifications
12. Registering VET teachers
13. Evaluating the quality of VET teaching

Yes, this has been helpful. Employment and working conditions should be added.

Question 5: have we missed any element or might some elements be combined?

We believe elements 8 and 9 can be combined. Career and employment structures should be added.

Question 6: is there any option that we have missed that you believe should be considered?

No, except for the specific comments we have made on some of the elements.