



SSTUWA

The State School Teachers' Union of W.A. (Inc.)

Inquiry into the delivery of the Vocational Education and Training in Schools (VETiS) program

**A submission from the
State School Teachers' Union of WA**

Preamble

The State School Teachers' Union of Western Australian (SSTUWA) is the industrial and professional organisation representing more than 16,000 school leaders, teachers, TAFE (Technical and Further Education) lecturers and school psychologists working in WA public schools and TAFE colleges.

In Western Australia, most notably in the past two decades, there have been significant factors that have impacted on our public schools. A single change potentially may have been buffered, reducing the impact on a student's attainment but the combination of multiple factors greatly impacts on students' potential to achieve at school and successfully transition beyond school.

These changes include, but are not limited to:

- Increasing the compulsory leaving age of students to 17
- Funding of year 11 and 12 students depending on their subject pathway (ATAR or Vocational).
- Reduction in budgets to provide for specialist teacher including those offering career advice/ counselling.
- Minimum literacy and numeracy requirements for graduation.

- Changes to the operation of Vocational Education and Training in Schools (VETiS).
- Devolution of responsibilities under the Independent Public Schools initiative (IPS).

It is also important to recognise the economic climate that Western Australia has experienced over the past two decades. The exponential rise of the resource sector during the mining boom, saw many students leave school early seeking employment opportunities where there was little requirement to have higher educational qualifications. Parents, particularly those in lower socio-economic situations, encouraged their children to take employment pathways that provided high incomes over further education and training.

Now, as the mining boom is winding down, unemployment rates in Western Australia have dramatically increased. In April 2017, approximately 100,000 people were unemployed in the state; the last time unemployment rates were at these levels was in February 1992.

Youth unemployment and underemployment is also a significant concern in WA and in regional areas of the state.

Introduction

In recent years there has been a significant increase in vocational education courses being delivered in schools and students accessing training whilst at school. This has been the result of several factors:

- The raising of the compulsory school leaving age has significantly altered the curriculum needs of senior school students.
- Federal funds have been directed to the establishment of Australian Training Colleges (ATCs) and Trade Training Centres (TTCs) in schools in a variety of partnership arrangements with other schools and institutions.
- A broader range of externally funded programs is being offered in schools including: school-based apprenticeships, pre-apprenticeships and traineeships (including those specifically for Aboriginal students); Workplace Learning (WPL); Education Support Units of Competency.
- Some schools have been accredited as Registered Training Organisations (RTOs).
- New WA Certificate of Education (WACE) requirements for attainment including Certificate II or higher, or a minimum ATAR score.

A critical consideration is that all these changes have occurred against the backdrop of significant budget cuts to public education - over \$300 million in 2013 and no commitment to funding through the Gonski model. This has greatly put at risk public schools' ability to offer meaningful and relevant vocational education courses to all students and meet individual student's aspirations and goals.

It is the SSTUWA's belief that the introduction of VETiS in its current form, that is, a requirement to undertake a certificate course aligned the Vocational Education and Training sector's skilled based competency framework was not clearly assessed in terms of how the two education sectors would interact. Each sector currently operates with different delivery modes, different ideologies on curriculum and content and different ways in which they assess students.

The previous Education Minister Peter Collier's unilateral decision to require students to complete

a Certificate II or higher, as part of a pathway in achieving a Western Australian Certificate of Education (WACE), without any consultation prior to it being implemented, has caused enormous financial and resourcing pressure on schools and has resulted in outcomes where student choice, aspiration and aptitude have been overridden by funding considerations.

It is the SSTUWA's understanding that WA is the only state to require a Certificate II as part of the schools' vocational education pathway option.

The need to offer a form of vocational education to school aged students has existed for some time and the SSTUWA believes that a version of this should be able to be offered to all students.

Operation of VETiS at the school level

Changes to the delivery of VETiS have impacted on the organisation of schools, staffing requirements and on individual staff.

With the move towards Independent Public Schools (IPS) and the one-line budget, responsibility from the Department of Education (DoE) has been devolved to individual schools. There is little oversight or management from the DoE in relation to setting up connections between the schools and the training providers - the mantra of the IPS is that it's a local decision. Schools have been placed in a difficult situation where they have to understand a complex VET system and the extra assessment, delivery and auditing requirements of this system, with little to no extra funding, resources or support.

The impact of this has been widely felt amongst schools delivering VETiS, especially as they are entering into agreements with external RTO's where they must comply with the RTO's auditing, assessment protocols and criteria.

While VETiS is a systemic initiative, schools have been left to implement this with little guidance or support and with dwindling funds.

In the 2016 Western Australian Auditor General's Report into Vocational Education and Training for

Year 11 and 12 Students in Public Schools, there are clear findings that the DoE has:

“gaps in the guidance that need addressing to help ensure the system’s effectiveness. Resourcing in DoE to assist schools has not increased with the rise in VET enrolments and course availability...Schools advised us they had difficulties obtaining this advice or clarification....There has been no analysis of enrolment trends as they impact teacher workforce planning.”¹

The DoE

“does not provide template contracts or specify minimum contract requirements...As a result, schools have entered into a wide range of contracts whose features vary greatly...the risks of inconsistent contracting that come with this approach need addressing.”²

Schools must also deal with conflicting timelines for the provision of data to the DoE and the RTO. Because there is no systemic transfer of data from the DoE to individual RTO’s, this places an added burden on schools to provide this information to the RTO - where in some instances, the data required is similar or the same, but the RTO requires different formats.

Members have also raised their concerns over the RTO’s reporting period, which is later than those required by DoE and SCSA. This causes significant challenges for schools in meeting DoE and SCSA reporting requirements and subsequently affects delivery of reports to parents and students.

Staffing

The staffing profile at a school is not mandated by DoE with regard to VETiS, despite this being a systemic initiative. Under the one-line budget, schools are now able to modify their staffing arrangements at the local level.

On the surface, this appears to allow for local autonomy. However, there are significant issues with delivering VETiS equitably across the public system. Despite VETiS being a systemic initiative, there

are no set requirements, accountability or support mechanisms across the state.

Teachers undertaking delivery of a VETiS certificate are bound by the Standard Registered Training Organisations (SRT0) Act³, which requires additional qualifications beyond a teaching degree including:

- a. Vocational competencies at least to the level being delivered and assessed.
- b. Current industry skills directly related to the training and assessment being provided.
- c. Current knowledge and skill in vocational training and learning that informs their training and assessment.
- d. Either Certificate IV in Training and Assessment or a Diploma or higher level qualification in adult education.

These requirements for staff in schools are resource intensive and require maintenance of qualifications in order for the RTO to be satisfied for accounting and auditing requirements.

Teachers, the majority of whom have completed Bachelor degrees in a particular area of study and in some instances, hold Masters and Doctorates in subject specific areas, have been required to complete a Certificate II in that subject in order to meet the requirements under the SRT0 Act.

On top of this a teacher, who in most cases has completed at least three years of a degree through a university, is required to complete a Training and Certificate IV in order to be able to assess a student or auspice a course. While some RTO’s have provided guidance to teachers and schools on how to complete a form that will recognise prior learning against delivery of a Certificate II, other RTO’s have been exceptionally difficult in providing school staff support or guidance.

1. <https://audit.wa.gov.au/reports-and-publications/reports/vocational-education-training-year-11-12-students-public-schools/> Page 22

2. <https://audit.wa.gov.au/reports-and-publications/reports/vocational-education-training-year-11-12-students-public-schools/> Page 21

3. Standard Registered Training Organisations (SRT0) Act Training and Assessors 1.13 <https://www.legislation.gov.au/Details/F2014L01377>

SSTUWA members have raised numerous concerns over these requirements, which some teachers feel to be inferior to the qualifications they hold.

For example, a teacher who held Masters degrees in Agricultural Science and Education was requested by the RTO (in this case a private provider) to complete a Certificate II in Agriculture. Even once the requirements of qualifications have been met, there is then the additional time required by a teacher to complete and maintain currency. The DoE originally offered funds via a Teacher Industry Placement Scheme (TIPS), however it is now unclear if there are sufficient funds available to cover the costs associated with these requirements, now that schools are operating under a one-line budget. As there is no requirement by DoE to report on how funds are spent for VETiS, despite this being a systemic initiative, it is difficult to ascertain what and how funds are being utilised across the system.

It is also worth noting that because of the specific requirements by the RTO under the SRTO on a teaching staff member to deliver a particular course, this impacts on that teacher's ability to take leave. The SSTUWA has become aware of a number of situations where teachers, who have been forced to comply with the requirement to take their Long Service Leave, are restricted in the time they can take off because to have a replacement relief teacher for their VETiS courses, that relief staff member must be qualified and approved by the RTO to deliver that course.

Added to this is the lack of a consistent formula across the state for school support staff to assist in the volumes of paperwork/data entry required by the RTO for their auditing processes.

VET Coordinators

As there is no staffing formula to support the delivery of VETiS, there is no requirement for schools to provide a VET Coordinator. Despite being a systemic initiative and linked to achieving a WACE, the DoE has left the decision to the school as to how they provide any support for VETiS.

As there is no systemic way of supporting VETiS and no auditing requirement by the Department of

Education, there is great inequity across the system. One school may choose to have a full-time teacher dedicated to the role of VET Coordinator, who has a teaching background and with vocational education experience, while another school may only have a part-time VET coordinator and responsibilities are shared with other VET teaching staff to comply with the RTO's audits and accountability requirements; or a VET Coordinator may be an office staff member with no teaching background.

This is a significant oversight by the DoE.

Achieving a WACE

The original intention, as the SSTUWA understands it, was to make changes to the requirements that a year 12 student needed to complete high school and by doing so raise the educational attainment of more year 12 students across the state. These comprised raising the compulsory schooling age to 17 and the push for more school aged students to gain a WACE, through either an ATAR or a VET Certificate II or higher.

There is now a Western Australian Statement of Student Achievement (WASSA) which formally records a student's achievement in every course, qualification and program that the student has completed in secondary school, which is provided to all students leaving year 12. This document can be used by students for future employment or to access further education and training. It will not be suitable for entrance into university unless a student has met the requirements of ATAR (as has previously applied).

Should a student still fail to meet the required standards before leaving year 12, they are not granted a WACE, but are provided with a Western Australian Statement of Student Achievement (WASSA).

Similar statements are provided throughout the country to year 12 students. They can be used to assist in applying for further education and training and employment.

On top of this, WA students must now demonstrate that they have a minimum standard of literacy

and numeracy by the time they leave year 12. The intention is that this “minimum literacy and numeracy standard (the first of its kind in Australia) [would] ensure students with a WACE were better equipped for the workforce and further education and training.”⁴

Students who have achieved a Band 8 or higher in either Reading, Writing or Numeracy in Year 9 National Assessment Program - Literacy and Numeracy (NAPLAN) are deemed to have met the minimum standard of Literacy and Numeracy.

Those who have failed to achieve a Band 8 or higher in the Year 9 NAPLAN are required to complete the OLN. There is no exemption for students with disabilities, however the School Curriculum and Standards Authority in WA (SCSA) does provide for the ability to make “reasonable adjustments where necessary for students with disability.”⁵

Six opportunities are provided for students to demonstrate the minimum standard in Literacy and Numeracy between years 10 and 12 if they fail to achieve a Band 8 or higher in Year 9 NAPLAN.

An examination of the secondary graduation rates outlined in the Department of Education WA Annual reports⁶ indicates that the graduation rates from 2010 to 2015 have only increased by 11.6 per cent. The anomaly is in 2014, where the graduation rate significantly increased to 80.5 per cent. This can be explained by the half cohort of students finishing year 12 that year and so is not a true reflection of usual trends. If a comparison is made from the full cohorts of 2013 and 2015, a more stable comparison, then the graduation rate is only marginally increased by 2.2 per cent.

VET component

For a student to complete a Certificate II or higher, this must be done through a Registered Training Organisation (RTO) - either through auspicing arrangements with the school or directly through an RTO; either TAFE or a private provider.

The Vocational Education and Training sector operates by delivering competency-based skills,

essentially focusing on a narrow set of skills, usually linked specifically to industry.

While the Department of Education may view VETiS “as part of a broad education that engages students and develops skills”⁷ this is not the same view taken by the VET sector, whereby the nature and current design is centred on the delivery of competency-based skills.

Data from the SCSA indicates that the number of students choosing VETiS courses has doubled since 2012 to 31,504 in 2016.

However the impact of decreased school budgets and the residual effect of the half cohort has meant that public schools have not been able to offer VETiS courses based on student interest and aspirations.

Documents provided by the DoE to the SSTUWA indicated that in 2015, 94 public schools were offering Certificate courses in Business/Financial Services and 79 public schools were offering Information Technology/Digital Media. These courses are able to be delivered in larger class sizes and usually without specialised resources.

Data from the National Centre for Vocational Education and Research (NCVER) indicates that the most popular training packages for VETiS students, across all schools in WA were in Sport, Fitness and Recreation (18.4 per cent) and Business Services (18 per cent) in 2015⁸. And the Western Australian Auditor General’s 2016 Vocational Education and Training for Year 11 and 12 Students in Public Schools report mirrors the NCVER data, with 21 per cent of the schools surveyed offering Sport/Recreation/Coaching Certificate II courses and 16 per cent offering Business Certificate II courses.⁹

4. http://www.scsa.wa.edu.au/_data/assets/pdf_file/0011/323399/SCSA-AR-2015-16.pdf Page 42
5. <http://senior-secondary.scsa.wa.edu.au/assessment/olna/disability-adjustments>
6. <https://www.education.wa.edu.au/web/our-organisation/publications/annual-report>
7. <https://audit.wa.gov.au/reports-and-publications/reports/vocational-education-training-year-11-12-students-public-schools/> Page.7
8. <https://www.ncver.edu.au/data/data/all-data/vet-in-schools-2015-western-australia#Table5>
9. https://audit.wa.gov.au/wp-content/uploads/2016/12/report2016_32-Vets.pdf Page 16

While it might appear that students are taking up these options through preference, there is often little or no choice at the school level for students to make real choices based on their interests and/or aspirations, rather these are decisions based on funding, or lack thereof.

Delivery of VETiS

Fundamentally, the concept of offering vocational courses to senior school students is a good one and has been a part of secondary schools for some time. Historically, vocational training in schools has led students to apprenticeships and further training, often linking to TAFE courses for further study. Student would often go off school site and undertake their courses at TAFE. This was a pathway for students wanting employment or further training and for some who struggled in a school environment.

With the changes as outlined in previous sections of this submission, the vexed questions which the Education Department, nor the Training and Workforce Development Department, nor the previous Education Minister have been willing to address, are - who is best placed to deliver vocational education and training to school aged students, what is the actual purpose of delivering VETiS and who will pay for this?

As stated previously, the requirement of students to undertake certificate courses aligned with competency based standards is in conflict with how schools offer curriculum as well as deliver content.

What we are seeing now under the changes to vocational education in schools, are students undertaking competency based certificates as part of VETiS, which have a narrow focus on a set of skills and are usually aligned to an industry rather than a broad range of educational skills that can be applied across a range of areas.

A broad range of educational and developmental elements are developed throughout compulsory education.

However, the competency skills based approach on which the VET sector is focused has the potential

to jeopardise the student's long term success by creating a narrow set of skills whose application may be limited to a particular industry or field.

There is no doubt that offering students subject options that appeal to their aspirations, abilities and interests increases the student's likelihood of success while at school, as well as providing choice in career opportunities in the future.

Regional, Rural and Remote Students

There are significant inequities for students in regional and rural parts of Western Australia when it comes to education in general.

For students wanting to undertake vocational education and training options, these inequities are further exacerbated.

In 2015, 13.3 per cent of inner regional, 8.2 per cent of outer regional, 4.3 per cent of remote and 2.1 per cent of very remote students were undertaking VETiS. This is in comparison to 71.2 per cent in major WA cities.¹⁰

Reductions in school budgets and the lack of a broad range of qualified VETiS teachers in regional, rural and remote schools significantly narrows the opportunities for students to engage in meaningful educational opportunities.

Members have raised concerns with the SSTUWA and DoE that regional delivery of VETiS is also hampered by locality and proximity, or lack thereof, to an RTO.

Work placement opportunities for students are limited for regional, rural and remote students. Workplaces may not be available, or easily accessible to students.

The attrition rate of staff in regional, rural and remote areas also impacts on a school's ability to continue to offer a particular certificate or course.

10. <https://www.ncver.edu.au/data/data/all-data/vet-in-schools-2015-western-australia#Table 5>

If a staff member leaves the school, then the school has to either hire and re-train a new teacher to deliver that course and go through the process with the RTO to ensure that the new teacher meets all the requirements, or there may be a suitable applicant with all the relevant qualifications and experience. However this is rare. The final alternative is that the course cannot continue and so the student's education opportunities are at risk, through no fault of their own.

The courses on offer at a school therefore, are not necessarily going to reflect the interests or aspirations of a student.

Auspicing and Private Providers

Because of budget restrictions, public schools have been forced to seek cost effective approaches to providing VETiS courses that can be delivered to the maximum number of students with few resources required at the school level through an auspicing arrangement with an RTO, in order to have their students meet the WACE requirements. This often means choosing a private provider.

It is also important to note that approximately 80 per cent of public secondary schools in WA enter into auspicing arrangements with private providers because it is a cheaper alternative. However, the potential risk of these arrangements on students' educational attainment is significant.

The 2014 Strategic Industry Audit of delivery of VET in Schools in Western Australia¹¹ found the highest level of non-compliance in auspiced courses.

Approximately 80 per cent of VETiS courses in public schools are delivered through auspicing arrangements.

The Training Accreditation Council in their 2013-2014 checking of RTO's found that 35 per cent were either significantly or critically non-compliant with the national standards.

*"The audit recommended that TAC should consider developing a strategy to monitor the risks associated with school VET. A follow-up in 2015 found not much had changed."*¹²

In September 2015, the Australian Skills Quality Authority (ASQA) cancelled the registration of the private training provider Hands On Computing Training International PTY LTD which traded as the Australian Institute of Commerce and Technology in Western Australia.¹³

It is estimated that the cancellation of this provider has affected over 2000 students, 1300 of which are high school aged students across public, Catholic and Independent education sectors in WA.

Even more alarming is that there is a single biggest private provider operating VETiS programs to public school students, called VETiS Consulting. It is no coincidence that the name blurs the initiative and the company.

The risks of auspicing and private providers to students' educational attainment is real and significant. Yet, the only option that schools can use to deliver the requirements of meeting WACE to their students is to go through the less costly option of delivering through auspicing arrangements with a private provider.

Funding

The SSTUWA has regularly raised our concerns around the costs associated with VETiS delivery with the DoE, the previous Minister for Education, Peter Collier and the State Treasury department.

The SSTUWA is aware that prior to 2014, federal funds have previously been directed to the establishment of Australian Training Colleges (ATCs) and Trade Training Centres (TTCs) in schools through a variety of partnership agreements. However these funds have either been depleted or are no longer available.

11. <http://www.tac.wa.gov.au/newsandevent/Pages/VET-in-Schools-Strategic-Industry-Audit-Report.aspx>
12. <https://audit.wa.gov.au/reports-and-publications/reports/vocational-education-training-year-11-12-students-public-schools/> Page 18 AGO report 2016
13. ASQA Cancels Registration of Hands On Computer Training Pty Ltd." 2016. Australian Government. Australian Skills Quality Authority. August 1. <https://www.asqa.gov.au/news-publications/media/hands-computer-training-international-pty-ltd>

With the move to the one-line budget, and the move to the new student centred funding model, funds from the Education Department have been allocated to students based on their choice of studying a VET pathway or an ATAR pathway, but not both.

If a school chooses to offer students the choice to study both VET and ATAR courses, then the school must pay for this. This has not only narrowed options for students, it is embedding inequality across the system.

SSTUWA members have raised concerns that the funding that has been provided are nowhere near adequate enough to cover the true cost of delivery VETiS as it has not been prescribed.

Parental Contributions

Under the School Education Act 1999 Section 98.1

“No fee for instruction may be imposed in respect for a student for the provision of – a) a non-optional component of an education programme at a government school; or b) an optional component of an education programme at a government school if the instruction is provided by a member of the teaching staff.”

And the Department of Training Fees Policy 6.3.2 VET in Schools states “Secondary school students are exempt from courses and resources fees if they: a) are enrolled at school, as defined in the School Education Act 1999; and b) are undertaking a VET course.”

However, schools have felt the pressure of reduced budgets and have charged fees to parents for a variety of courses.

The VET loading as part of the Student Centred Funding model “does not cover the full cost to schools of delivering VET. Many schools also charge fees ranging from nominal amounts up to a few hundred dollars.”¹⁴

In the 2017 DoE Schools Resourcing and Support Directorate communication to schools on “Year 11 and Year 12 Vocational Education and Training Courses VET Coordinators Frequently Asked

Questions” the DoE’s response is that schools are able to charge parents for VETiS courses that

“have a high cost component, is delivered by an external provider, the course is of a very high educational value, an alternative course providing the equivalent education outcome to the students is not available and non-payment to the school for the course results in the risk of cancellation of the course, or the Sports Education and Development Australia (SEDA) program is being undertaken.”

This clearly indicates the inadequacy of the current funding arrangements to provide for the full cost of delivery to public school students and the inequities that this is embedding into our public school system.

No parent should be required to pay for a compulsory part of their child’s education in a public school.

Is VETiS a success?

Without any commentary, data would suggest that the 67 per cent of the year 12 cohort in 2016 who undertook a Certificate II, III or IV¹⁵ is an indication of the VETiS program being a success. However, simply being enrolled, completing or partially completing a Certificate II, III or IV does not automatically translate into students being in employment, undertaking further education and training or tertiary education, or that these courses were of interest to the student’s aspirations and future careers.

Prior to 2014, post school destination data was gathered by the Department of Training and Workforce Development through the WA School Leaver Survey.

No destination data survey has been gathered for the 2014 half cohort of students.

14. <https://audit.wa.gov.au/reports-and-publications/reports/vocational-education-training-year-11-12-students-public-schools/> Page 23

15. https://www.scsa.wa.edu.au/__data/assets/pdf_file/0011/345458/Year-12-Student-Achievement-Data-2016-web.pdf Page 70

From 2016, the Department of Education will be surveying students who have left year 12 through a Post School Destination Survey.

The accuracy of this survey data is questionable as it cannot be a true reflection of all student movements from school to post schooling opportunities, unless the majority of that years cohort of students completes the survey.

The SSTUWA is not aware that this data has been provided in Department of Education Annual reports.

A comprehensive analysis cannot be made without proper post schooling destination data being collated and mapped over a period of time.

Recommendations:

1. That the mandatory requirement for students to have a Certificate II if they have not completed four Year 12 ATAR courses to gain a WACE be removed. Students still meet a minimum literacy and numeracy standard by the time they finish year 12 and also leave school with a statement of their school achievement (WASSA). Without adequate funding that truly reflects all the costs associated with undertaking a certificate course at school, and until the competing interests of the Education Department and the VET sector are rectified, mandating a certificate as a pathway for a WACE provides no real meaningful achievement or future prospect for students.
2. That a full and proper review of how vocational education and training should operate in a school context be conducted with all key stakeholders.
3. That until such time as there is an agreed replacement model for offering vocational education to high school students, pending the outcome of recommendation 2, the Student Centred Funding Model still provide for those students wishing to undertake a vocational education courses in year 11 and 12 and that adequate funding be provided for those staff to meet and maintain any requirements of the Standard Registration Training Organisations (SRT0).
4. That the Department of Education ensure there are processes in place where an external provider ceases to deliver the course enrolled in, or when students changes schools and their certificate course is not available, so as not to disadvantages students educational attainment.
5. That the Department of Education produce and implement risk plans in consultation with all key stakeholders for when providers collapse, or when training packages change.
6. That the Department of Education provide a staffing formula that is funded to provide for dedicated teaching staff to fulfil the role of VET Coordinator.