Submission to Education and Health Standing Committee – Delivery of Vocational Education and Training in Schools (VETiS programme

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This response to the Education and Health Standing Committee is prepared on behalf of the Australian Secondary Principals Association (ASPA) and the Western Australian Secondary School Executives Association (WASSEA).

Considerable debate continues about the value of VET and in particular the value of VET delivered in schools. *"Vocational education is central to Australia's economic growth and business productivity. The VET reform agenda is multi-faceted but focused on getting better outcomes for students, employers, training providers and taxpayers."* (Australian Government, Department of Education and Training, July 2015)

VET programmes allow students in the later years of secondary school to study towards a vocational qualification, while simultaneously earning credits towards finishing school. In 2014 the Education Council decided to update the New Framework for Vocational Education in Schools released in 2001 when the VET sector and vocational education in schools was expanding.

The Hon Sussan Ley MP led the review aimed to *"ensure that vocational learning and VET delivered to secondary school students reflect modern schools and workplaces"* The resultant policy document *"Preparing Secondary Students for Work"* is essential reading.

In a paper from the Australasian Curriculum, Assessment and Certification Authorities they explored the

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general misconception that VET delivered in schools is somehow different from all other modes of VET delivery. The reality is that:

- All VET is drawn from nationally recognized training packages or accredited courses
- All VET is delivered and / or assessed by Registered Training Organisations (RTOs) or in partnership with one, all of whom are compliant with the VET Quality Framework or the Australian Quality Training Framework
- All VET is assessed within a competency-based assessment framework by assessors who comply with the VET Quality Framework
- Students are awarded nationally recognized VET qualifications and / or Statements of Attainment by the RTO delivering and / or assessing the VET

At this point it is important to note that, under the rationale outlined, VET delivered to secondary students is the same as VET delivered to non-secondary students (VET managed by the VET sector).

"Preparing Secondary Students for Work" makes a clear distinction between Vocational learning (managed by the school sector) and VET, which is managed by the VET sector. Schools and industry need to be clear about the differences. The framework recognises the importance of both in preparing secondary students for work.

'Vocational learning' describes a wide range of activity delivered within the broader school curriculum and includes career education programmes, through which secondary students explore the world of work, build career development skills and learn about the different education, training and employment pathways available to them. VET delivered to secondary students is a more formalised programme of learning through which students achieve, or make progress towards, achieving, a nationally recognised qualification through an industry-developed training package or a course of study that is accredited through national and state quality assurance processes.

Many in industry have the view that VET delivered in schools is different to other VET and does not prepare students adequately for the workforce. Certificate I and Certificate II courses are designed to provide preparatory / prevocational level training and the majority of students continue into post school education and training. These preparatory level Certificates have little to offer employers and gone are the days where young people can enter the labour market directly from school and access sustainable employment.

We must improve engagement between industry/employers and schools and address the issue of school and RTO understanding of employer expectations for workplace learning as part of a VET qualification. VET programmes are developed in consultation with industry, as well as the VET sector. The focus in this collaborative work is three-fold: what is appropriate for school-aged young people to be studying; what skills are most relevant to employers; and what challenges schools face in VET delivery.

Javier Amaro Castillo (President at Australian Society of Training and Development; 11th June 2015); argues that for a VET system to work effectively, the environment where it is applied must present the following conditions in a competency-based framework for stakeholders to set, communicate, apply, and evaluate the objectives, and impact of VET qualifications:

1. Industry relevance - learning objectives of every training programme must address standard industry practices. The skills and knowledge learners will learn during the training, must provide them with

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the ability to perform the tasks of a competent worker within a particular job / role.

2. Operational Standards - the accountability of training providers within the system, in regards to the results of training, measured at the five dimensions of value (Reactions, Learning, Application, Impact, Return on Investment).

3. Global pathways - the recognition and use of VET qualifications within the formal education system (including the school and higher education system).

Students and the community need to understand the benefits of VET, how VET can support their lifelong learning and how VET can serve as a bridge for employment and further studies. The WACE requirement for "Completion of at least four Year 12 ATAR courses or of a Certificate II (or higher) VET qualification" can be both a positive and negative for the promotion of VET in our schools.

To prepare this response, a range of school leaders were surveyed across a variety of Western Australian schools from metropolitan and country locations. This response reflects their answers to the questions that were posed.

1. How well the programme is meeting the needs of schools, students and industry

- It is evident that VET serves a number of purposes for students. VET in their senior secondary programme can be a means of career exploration, as a mechanism for achieving senior secondary graduation or to become more competitive in the workplace, further education, training or employment. For schools, VET may be seen as a strategy for retaining and/or engaging students in senior secondary education or to 'value-add' to a senior school programme.

- VET in Schools programmes have often been directed towards developing in young people the skills, competencies, understandings, and attributes which equip them to be innovative, and to identify, create, initiate, and successfully manage personal, and work opportunities - including working for themselves. This type of learning provides students with skills and attributes that employers are looking for, such as teamwork, commitment and flexibility. It also helps to develop a realistic knowledge and understanding of business and working life. This is further supported through Career Development that underpins and supports the skills towards lifelong learning. It is these skills that enable our students to succeed in VET in Schools programmes and contribute towards increased levels of attainment. As we seek to increase our attainment levels at Certificate II, these are the programmes that are most at risk and a challenge for schools is finding alternate ways to address this requisite. Perhaps a solution is for students to engage in workplace training at an earlier year level. In fact for many students who are at risk of dis-engaging from school entirely, work focussed education programmes have proven to be successful in both keeping the students engaged in learning and putting them on a path towards long term employment. The lack of funding for at risk youth to access Certificate courses in Year 9 or 10 (as was previously the case) is seriously detrimental to the future prospects of this small group of students.

- Industry demands on teachers seems to increase each year, as audits occur and as training packages are updated. An emerging issue is that some Units of Competency within qualifications, for example Hospitality, now have unrealistic or an overwhelming number of hours of industry experience required by teachers. Although willing to undertake industry placement, or undertake training, staff are committed to their classes and do not want to leave their classes and particularly their non-VET teaching load (ATAR classes etc.) for an extended period of time to do VET training. It is also an impost on schools who need to ensure the needs of all students (not just VET students) are met and

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that their teachers are consistently available to deliver their course. This issue is amplified when schools offer Cert III and IV courses as there is a impost to undertake additional training to meet delivery requirements of these higher qualifications even if the teacher has the skill set to deliver the course. This has been a big ask as most have a VET load of 0.2 – 0.4 and need to be available to cover the rest of their teaching load (ATAR and general courses) on a consistent basis.

- Demand on currency and competency requirements of trainers under the Standards for RTOs 2015 is both costly and time consuming. At Certificate II level the qualifications we are delivering are through third party agreement and teachers believe the requirements are not aligned to the currency and competency requirements or *at least to the level of the Certificate being delivered* as these certificates are pre-employment level.

- The requirement at Certificate III and above are more reasonable as these are employment level certificates and trainers need to ensure they are up to date with current industry requirements. However, increasingly training packages are requiring trainers and assessor staff to have 'x' number of years in the industry. It is hard to recruit appropriate staff (with both a teaching degree and industry qualification) into teaching and for many it would mean they would have needed to spend 4 years learning the trade, 'x' number of years working in it and then a minimum four years at university to gain a teaching qualification. Hospitality is a prime example of shortage, Retail Cosmetics is another.

- In many cases RTOs tend to be quite inflexible with materials delivered and teachers are working under constraints of two systems (VET & Department of Education). The RTO inflexibility to modify resources, or the convoluted and lengthy process to have modified assessments approved by the RTO, increases workload and in many cases results in teachers being deterred from improving and updating resources. This results in some students being delivered pre-set material, rather than curriculum which is differentiated for individual students or class groups and targeted for context. On the other hand this stance has been taken as many teachers who have completed the TAE40110 in three hour/three day courses may not fully understand the requirements around assessment under the AQF. The findings from the VET in Schools audit highlighted this issue and noted that there were cases where assessments were changed and were not compliant without RTO approval. Resourcing to support this requires both time and money as schools find it difficult to allocate additional resourcing and time to release teachers to work with the RTOs on assessment. By completing the RTO assessment tools it is expected that the compliance requirements will have been met.

- Students would benefit from greater industry involvement at classroom level, however the demands on teacher time required for best practice hinder the capacity to achieve best practice.

- Many students engage very well with VET and achieve good outcomes, however there are many enrolled in programmes that may lead to limited career opportunities (e.g. Certificate II Sport and Recreation, Certificate II Business) and because there are so many graduates in these courses it tends to 'devalue' the qualification. In several cases, these courses will assist in transition to further study/TAFE but they are not always a viable direct pathway to employment as many students will never work or study in the vocational area in which they achieve their Certificate II. The value is of course in completing a Certificate II, towards a successful transition into further education, training or employment.

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- Schools are becoming more discerning in the courses they offer, however the availability will always depend on auspicing capability, qualified teacher availability and cost. Many schools are now offering more career focussed courses and some schools deliberately offer courses that enable ATAR students to gain part time work while they continue tertiary study. Examples of this are VET offerings in Hospitality, Sport and Recreation with an AUSTSWIM focus, Assistant Dance Teacher, Retail, Business and IT.
- Setting up SBTs for individuals enables students to access a wider range of qualifications in areas of their interest. However, monitoring these has seen an increased workload for school staff including liaising with various RTOs, ensuring students do the work booklets and so on. Schools used to get an incentive payment for each SBT set up and monitored. Although this does not happen anymore, there is still the requirement to set up, monitor and support the students.

- Workplace Learning (WPL) is the opportunity for students to gain experience at an industry level. This again highlights the need for adequate resourcing. Schools need to be resourced with time for a coordinator and staff to meet the WPL duty of care requirements under the DoE policy requirements. The new DoE policy will increase the compliance requirements for schools in addition to increasing the time that employers will need to be engaged with paperwork and inductions (time they are often unwilling or unable to give). Although this is funded, if schools are to align qualification delivery with on the job experience (the best model for VET) additional resourcing is required to not only support the students but also the workplace. Schools often necessarily impose limits on the number of VET students they can effectively, manage. Particularly for ATAR students, this often has to occur during school holidays. This again is a resourcing expense for the school and requires careful deployment of staff to ensure duty of care requirements are met on non-school days.

- Schools offer courses aligned to further training and study. In the case of a Certificate IV being delivered, it is usually as a fee for service and targets students who are university bound or looking at training options at Diploma level. The packaging of these qualifications are carefully tailored to ensure students are able to meet the assessment condition requirements. They are being provided as further study pathways (which then leads to employment) and not direct employment pathways.

- Timetabling constraints often impact on a student's ability to engage in a qualification they would like to undertake. Attending training off campus may impact on the student's school studies if their course workload is not managed appropriately. Schools often try to limit risks of a student not graduating by actually increasing the risk by enrolling a student in five courses, one qualification offsite and Workplace Learning. This would be to ensure they have enough units to graduate in case the student does not complete the Certificate. This could see a course load of up to 16 courses/equivalents each year, a total of around 28-32 courses/equivalents over two years depending on whether a student completes two Certificates and undertakes workplace learning each year. While seeming to be a good strategy, by attempting to give a weaker student a 'fail safe', schools operating in this way are in danger of overloading the student and may be increasing the risk of non-completion.

  On the other hand, those who choose to 'have a go' at ATAR, then decide it is too hard and move to a General Course are often disadvantaged because it is too late to enrol in TAFE VETiS courses, or to complete the whole Certificate if they have missed a term or a year. Without School Based Traineeships many of these students would not be able to achieve a Cert II at all.

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Additionally, it is problematic when students are 'out' one (or two) days at TAFE, and one day in work placement. The structure and difficulty of General Courses and school timetables work against some students being able to succeed (and classes being viable at school). Some students choose to pass the Certificate qualification at the expense of their other school studies and achieving WACE.

Schools note that it is much easier to have all students doing Courses and not having to juggle more individualised career pathways. Timetabling issues are compounded as they inevitably lose students from Year 11 into Year 12, making some classes unviable to continue especially in schools with low senior secondary numbers. There is a fine balance between the amount of extra work and organisational issues that VET provision requires and the benefits to the whole cohort of students.

- In many contexts, VET is meeting the needs of students because for most of them schools are able to personalise what they do to meet their career aspirations, or at least put them on a pathway to where they might want to be in the future. One school stated that this is mainly because of the large number of School Based Traineeships (SBTs) they are able to set up in relation to their WPL numbers. In all cases, schools note that the success of the VET programmes is because their WPL/VET coordinator are really dedicated and go above and beyond, often out of school hours and in school holidays, to make sure Course requirements are met and work placement supervision is adequate.

- The completion of a Certificate II can be a 'foot in the door' to further TAFE studies for many students. Often the competency structure of Certificates, and the support offered in the TAFE system for students with learning difficulties, ensures they are able to experience success and pass.

- Students can be greatly disadvantaged if they complete one Certificate II in Year 11 and are not being funded to continue into Cert III or IV in Year 12. This halts their learning in that field of interest and breaks the work experience and engagement cycle. Even though some schools are able to offer higher level Certificates on a full or part 'user pays' basis, this effectively excludes a vast number of students who do not have the capacity to pay. For students that would like to complete a second Cert II and expand their breadth of industry knowledge and involvement, lack of funding disadvantages them as well. This issue is compounded if students need to commit to work placements during holiday breaks as many students rely on income from holiday jobs to get by and forfeiting paid employment for non-paid WPL may not be a realistic expectation.

- In regional areas a well-established and delivered VET programme can be a real boost to the community by meeting industry needs in that rural area especially where the school, RTO and industry are able to work together effectively to decide on appropriate scope and level of Certificates to offer. For example one school stated that as a country town which services an agricultural community, Certificates in Rural Operations, Agrifoods and Engineering are useful to the community and it is easy to engage both students and employers. Also because they set up many SBT/SBAs, some businesses have had multiple work placement students who have ultimately gone on to full apprenticeships and employment in that community.

- Conversely there are regional schools who are having problems providing students with relevant Certificates because they have little success liaising with industry and the TAFE largely decides which Courses are to be offered. Without consultation and collaboration (and the quality of this certainly varies across communities) the VET offerings are not always useful as work pathways. Schools try and overcome this by upskilling teachers in VET so that offerings can be more diverse and more

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focussed. A real problem here is that in regional areas there is a greater turn-over of staff and keeping an industry skilled teacher is often a challenge. All schools face the problem of course viability when skilled teachers move on. It is time consuming and resource intense to keep training new VET deliverers especially in specialised courses. This is possibly one of the reasons that many schools opt for the more generic courses such as Business or Sport and Recreation.

2. **Challenges for regional and remote areas**

- Teacher transiency, inability to find suitable replacement at short notice, teacher training expenses, teacher currency and high staff turnover/teacher retention are always and issue especially in country schools. Staff turnover, particularly qualified trainers impacts on the schools ability to sustain qualification offerings. These schools often have to try and get qualifications completed in a single school year as the possibility of the trainer not being there in the following year is highly likely. One year delivery for qualifications that require more time impacts on the students and the trainers. It is probably a fair assumption that some RTOs would be reluctant to engage under this model.

- As previously discussed the issues around staff maintaining qualifications and industry currency is always an issue but it is exacerbated in country schools due to problems of distance, number of courses, and ease of access to training in a timely and cost effective manner.

- Lack of replacement VET Coordinators for staff on leave/extended absence (e.g. this is not a role the DoE flying squad can easily cover!) is another issue.
- In regional areas the isolation of VET Coordinators and VET teachers without nearby schools to collaborate with is an added problem. This makes it very hard to network and share resources, ideas and programmes and in regional areas the teachers are more likely to be inexperienced and in need of collegiate support.

- In some areas, there are no local TAFE or RTOs available and so VET provision may not be possible.

- Regional areas require the ability to engage additional RTOs that can provide flexibility in creating more innovative programmes that are measured on the transition of the student. The requirement here is fostering a close working relationship between the RTO, school and Industry.

- While there are some good stories, many country schools note that the state trainers are unreliable and they complain about RTOs not meeting their agreements and timelines

- Schools also note that there is mixed success in RTOs providing support and guidance to trainers in schools. This depends on the region.

- To cater for regional and remote schools, additional costs are often charged by RTOs and can be excessive therefore limiting a school's ability to engage with appropriate providers.

- In addition, RTOs may refuse to travel to remote areas or cost of flights and accommodation and travel for RTO staff to assess and moderate work and auspice in general is an issue

- Student transiency (unable to enrol in the same course at a new school, enrolment costs) are a real issue. Some work has been done in regions such as the Pilbara to get schools to identify qualifications and packaging that would support the transient nature of some of their

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students. Although this would solve issues of students moving schools within the Pilbara and therefore being able to complete qualifications, this is impacted upon if staff leave and also if the school has a heavy reliance on the local employers for VET support and cannot offer a wide variety of VET offerings.

- There are challenges with high percentages of SAER (students at educational risk) students (including disengaged, special needs, students with a non-English language background and Indigenous students), because it is difficult to find and retain vocational offerings and costs associated with tailoring opportunities to meet the needs of student interest can be prohibitive. For example, if one student wants Childcare, another is interested in Mechanics a school will do their best to meet the request of both high need students, but costs cannot be shared as different training providers are required for different industries.   SAER students always pose a conundrum if schools are trying to meet benchmarks rather than provide appropriate pathways and programmes for these students. When schools are focusing on attainment figures and not engaging in programmes that are not complete qualifications or accredited courses or that don't contribute towards WACE, they may not be meeting the needs of these students. In addition, it is often necessary to engage these students earlier than Year 11 and targeted funding is needed to keep some of these students engaged at school from Year 9.

- School express concern about their lack of ability to provide a reasonable choice across industry areas.

- In addition, there is a perception that unless there is a buy in from the resource sector to support delivery of targeted courses, then schools tend to offer qualifications such as Sport and Recreation, Hospitality and Business. These qualifications are probably beneficial in some regional areas as this is where there are possible job opportunities, but this is not always the case and of course the more students that complete the same qualification the more competition for work placements and employment in that area.

- The ability of students to get to TAFE colleges for programmes is more problematic in country regions – even in relatively large towns. Factors such as distance and time taken to get to training or work placement and transport arrangements, including seemingly simple things like bus availability, are limiting issues for students. For example, schools in the South West note that there is a whole story around the buses to Albany from Mt Barker and Denmark that needs to be explored. These issues impact on what offerings a student can access and whether they can even get to a workplace for the required number of hours per day considering they may have more than 2 hours travel to add to the work day.

- Often in country schools (and smaller metropolitan schools) smaller student numbers and hence less funding impact on the financial viability to run courses. This in turn impacts on variety, choice and student engagement. In the city a student may have the option to change schools to access a specialist programme they are interested in. This is usually not possible in regional areas due to the tyranny of distance and cost.

- Benefits for regional communities include: the culture of Training developing in the town; linking the Certificates on offer to local needs; keeping families together and creating and exploring ongoing employment opportunities in the region.

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- Attendance, literacy and numeracy, remain a major priority for all schools with a focus on achieving educational outcomes and overall student attainment. These challenges become highlighted in the more regional and remote outlying areas. Low attendance will generally attribute to low numbers in a programme making it unsustainable, therefore reducing opportunities towards attainment in remote regional areas. Literacy and numeracy specialists are also harder to come by and retain.

- Development of VET programmes for students at risk of not completing secondary schooling, which articulate into the development of generic, literacy and numeracy skills are increasingly sought after by schools. Often these students are ill equipped to take on the VET in Schools components, reducing the effectiveness of our resources in VET in Schools. Data across our more regional and remote schools indicate that in our more disadvantaged communities the greatest impact in retention is between Years 6 to 9, yet there is no money for VET programmes to engage these students in a work culture before they disengage.

3. Registration and ongoing monitoring of training organisations

- There are many schools that report ongoing issues with the standard of RTOs, the range and quality of courses offered and the level of collaboration with schools. Although some schools prefer to use TAFE because they perceive it as the better option because of the lower risk, there are issues with TAFE as well and these largely seem to be region specific. Comments include:
    - TAFE offerings are erratic, late in notification, subject to change and variable in quality.
    - Auspicing arrangements are undergoing constant change with RTOs changing their minds, and state trainers not wanting to 'play' with schools.
    - The changing of training packages is a constant challenge for trainers to keep abreast of details.
    - It is less risky to go with TAFE, but they are pulling back on their auspicing with schools.
    - With RTOs the standard varies from department to department. For example, the VET for schools department at one TAFE is hit and miss, but the Visual Arts department are very good. This highlights the discrepancies not just across TAFEs but within individual TAFEs.
    - Resources vary from RTO to RTO and so do the paperwork requirements. Some now seem to be making unreasonable demands. One school complained that one RTO now requires "that we send all the students work to them. If we want to keep a copy then it would take us hours and hours to copy".

- The TAFE sector refusing to work with schools 'without an existing (historical) auspicing arrangement' is incredibly frustrating for schools and hard to understand. Regardless of the calibre of the school resources, teacher capacity and student interest, schools are often forced to use private providers. The other issue is the limited number of RTOs that want to get involved in the VET in school space. Schools are often faced with limited options.

- MOAs are agreements rather than legally binding contracts, and from experience, rules have changed within a school year. One example cited is: "Staff submit a lengthy Industry Log Book and are approved to deliver the qualification but later that year, the RTO introduced a different 'updated' Log Book and staff will needed to undergo the entire process again". Because a MOA/MOU is not a legally binding contract there may be no support if terms are not met, other than reporting through to the regulator whether that is ASQA or TAC.

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- Schools have to gauge the quality of an RTO and talk to other schools before making new arrangements. Since some RTOs did not pass audit schools have become very selective in choosing who they work with, but this means that there is a narrowing of providers for each industry areas. For example there is one specific provider with a stranglehold on sports qualifications and if they go under it will be a disaster for schools.

- Significant time has been lost trying to fix the issues and stress (to students, parents and staff) caused by the collapse or suspension of RTOs such as Careers Australia and AICT. While these incidents are not common they are never the less devastating for those involved and schools have little control over the cause or outcomes. Schools are never going to control whether or not RTOs are sustainable. Asking for audit reports, endorsements etc. will not alleviate the possibility of an RTO being deemed non-compliant and therefore possibly losing its registration.

- Attendance at meetings with the ETILO is a brilliant resource. As one of the rare opportunities to network with people in the same role, discussions happen, both formally and informally, where VET Coordinators share information on RTO effectiveness and strategies used to best harness the RTO relationships needed to manage and support students. However, VET support provided through the Department is limited. The number of VET Consultants/Officers have significantly reduced in an area that it rapidly growing. The recent Attorney General's Report highlighted this as a major area identified under its review. VET Coordinators are already under the pump with compliance and management processes in their own schools and are being called upon to assist with the development of resources to support policy/VET requirements, therefore only increasing the workload on school resourced VET staff. One teacher noted she was lucky enough to be picked to complete the OAG survey in which she identified some issues with the data provided and thought the process was completed. On the last day of Term 2 she was sent a 8+ page document containing one question per page asking if she didn't mind completing with a due date on 21 July. It was put on the back burner during holidays as she had students out on work placement, RTP data to update, VET compliance requirements to meet and marking. She notes that while sourcing information is important, sending out 'questions' with no opportunity to engage in a conversation does not necessarily provide an accurate assessment of the situation.

- One school noted the value of ETILO support. "We have one ETILO in the North Metro region who is doing a great job for a large number of schools. Most VET Coordinators in the north metro are experienced. If this was not the case I would assume one ETILO would struggle to meet the demands of schools".

- School staff, (school leaders as well as support VET staff and teachers) feel stressed at needing to read, interpret and sign off on increasingly complex MOAs, which are using increased legal jargon and are agreeing to (at times) quite expensive purchasing arrangements.

- Professional Learning, when organised by Statewide Services is always very beneficial in supporting VET staff to understand and work with RTOs. More frequent PL would be useful, for both the training and networking aspects. Professional learning opportunities aligned directly to VET have been limited over the last 18 months. Other than some regional specific meetings and professional development organised by Statewide Services aligned to Career Education there has not been a lot of opportunities. The Teacher Development School in Busselton is offering a number of opportunities for professional development to schools that are located within the region or who are able to travel south. Having a TDS metro VET school could assist Statewide Services with professional learning opportunities. Less opportunity and support is available in some regional areas.

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- The requirements for school which is also an RTO to maintain that status is onerous, especially when the requirements of particular qualifications keeps changing. In particular ensuring the 'Industry Currency' requirements for full time teachers (this is also for teachers/trainers who are being auspiced by other RTOs) is an issue. When do they have time, when working full time, to also undertake a work placement?

- A big concern for many schools is that some external RTOs have no idea of what working with teenagers involves! The training sector is an 'adult learning environment', but many teenagers are not there yet and need additional support and motivation that needs to be provided by school staff. Schools spend a lot of time selecting RTOs on demonstrated merit to meet the needs of our students. Some private RTOs are excellent some are very average. Making TAFE the required first port of call for schools would be problematic in some regions because they don't always work with schools to understand student and course context or need. This is why some schools choose to use the use the private sector as RTOs for SBTs as they can be more flexible.

- RTOs that manage SBTs at Cert II, get $4500 (Cert III approximately $6000), however, students doing these qualifications are more likely to be successful when their school is actively involved in monitoring and providing support to students. At present, we are doing this over and above – for love. Parents phone the school, not the RTO or TAFE. We have a need to increase VET in Schools offerings in some regions within the existing resources. These resources in most cases are oversubscribed already.

- WA Schools and schools in the Mid West rely heavily on the partnership arrangements with RTOs to assist in delivery through an Auspice arrangement. The data would suggest that these arrangements now make up the majority of VETiS delivery at 48%. With one of the largest reforms in school funding, the ability of schools to continually meet the challenges of these arrangements will be a difficult task.

- RTO schools make up only 11% of VETiS delivery in the state and in the Mid West that figure would be much smaller. With major VET reforms underway and the new National Quality Framework for 2015 in place, this is becoming more challenging for schools.

- To make the most of these resources and support students in undertaking a broad robust curriculum that is both challenging and meaningful to their transition of post school options we require RTOs to be a great deal more flexible and innovative to the traditional strategies used in VET in Schools Programmes with a greater focus to the students transition post school and increased engagement with employers. The development of measurable Key Performance Indicators of best practice in VETiS Programmes would be a major step forward.

- A step forward would be a collaborative approach between schools, RTOs, industry and community stakeholders to identify what vocational learning programmes would look like for our students and how can we best support schools with the development of further programmes.

4. **Resourcing of the programme**

Managing VET resourcing at a school level is very complex and there are a very limited number of staff at each school, often only the VET Coordinator themselves, who fully understand the complexity of VET

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data and the speed at which VET can change. Overwhelmingly, schools agree that they are simply not resourced well enough to deliver VET and are heavily dependent on teachers' good will and their passion for VET delivery and quality student outcomes.

If schools are to sustain their VET model they must be provided with the resourcing and opportunity to upskill others to take over. As there are limited level 3 VET positions in DoE schools, hoping that someone will come in with VET experience to take over is not a best practice model. This will require resourcing especially in smaller schools which often do not have the capacity to spread the load.

- To ensure VET programmes are sustainable requires school support through staffing (allocation of FTE) and financial commitment. Where this has occurred, schools have reported that they are able to offer programmes that support vocational and post school options. One example is where a school has been able to develop VET pathway models where most qualifications will be offered to students on a Certificate II to III pathway which meets the abilities and needs of the students. The FTE allocation has enabled engagement with industry and RTOs to offer a number of appropriate Certificate III and higher qualifications. This is happening in an auspice and external delivery model. The coordinator has access to trainers in meetings twice per term which has allowed mentoring and support with compliance requirements. As staff are supported they are happy to undertake PL including industry placements to meet the Standards for RTOs', trainer and assessor requirements.

- The system is very focussed on DoE policy and procedures and SCSA requirements, however inadequate resourcing is provided to support staff in not only meeting these standards but also standards and requirements under the AQF. VET teachers receive no additional DOTT time, however they are required to operate within the VET sector in addition to the school constraints which include reporting structures, cross marking, and annual industry experience.

- Some schools are reluctant to invest in staff training if they are likely to leave or be poached by another school

  Resourcing / Budget Impacts:

- ICT pressures present for low SEI schools who do not have a clientele suited to a BYOD environment, yet VET resources are increasingly required to be completed online or created using technology as per work environments. Mock work places are being creatively set up in schools, but with larger numbers of VET students it becomes a sustainability issue with class volumes. Simulated work environments come at a cost, need to be managed and continually resourced. If we are to move to appropriate VET offerings, (which for many students should be higher qualifications than a Certificate II), then the simulated/real work environment is required in most instances. If this cannot be maintained, there is the potential risk of 'dumbing down' our VET offerings to a couple of easy to deliver Certificate IIs which are not accommodating the best post school pathways or employment opportunities for our students.

- RTO fees come out of school budgets. This is a significant amount for any school but many small schools struggle without having the economies of scale.

- More funding is needed to support SBTs.

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- State trainers are now passing all the work in relation to student registration for profile onto schools. This has significant workload impact as each application needs to be individually checked edited and uploaded by the VET coordinator. Before the emphasis was on the student completing this task and the coordinator rating applications, now it is all on the school

- The work by trainers on delivery, planning, assessing and maintaining currency is constantly growing due to compliance requirements

- New Certificate IV requirements mean that schools will have to get teachers to get the new Certificate IV or components thereof by April 2018. This is expensive both in terms of course costs and teacher relief.

- Teacher Industry Currency. Schools understand this requirement and do their best to comply, but we could have better quality delivery if we had the resources to actually send teachers out on 'work placements'. Many teachers complete Currency in their own time as their subject is their passion and often if they teach not VET subjects as well it is not viable to release them for extended periods of time. Their release from school can impact on all their non-VET classes considerably. A sustainable model cannot be reliant on the goodwill of teachers.

- Teachers have to have or be competent in the areas they are delivering. This costs time and money. Many teachers do this in their own time and pay their own course fees, but again we are reliant on the teacher's good will. Even Certificate II Level would be around $1500 and school staff are not always able to afford these extra fees. If further education were a requirement in many industry areas, the course costs would be covered.

- The equipment that schools have must be up to current industry standard (which in some areas is constantly changing for obvious reasons). This is an additional expense for schools.

- If resourcing only allows schools to pick the easiest and cheapest qualifications to deliver (for example Business) then the students will not have the breadth of choice and defeats the purpose and the spirit of VET in Schools.

- The phasing in of the Western Australian Curriculum impacts on all teachers, however VET teacher trainers are having to meet the requirements of new curriculum for WACE and for 7 - 10, in addition to an ever changing world of VET compliance. The new TAE40116 requirements will now require all trainers who hold the TAE40110 to complete an additional of 1 - 2 units to be able to deliver from 2019. Trainers will need to do this in term 4, at a cost per unit, in addition to possible relief costs (this will hopefully be reduced due to time of year because some teachers of senior classes will be free to take the relief) whilst also teaching middle school classes, marking exams and completing reports. The time may come when teachers will not want to work in the VET space, and if it remains an eligibility requirement for WACE, schools may struggle to provide appropriate VET offering to students.

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What needs to be done?

VET delivered well is a good alternative or addition to ATAR for many of our students. If we are going to create a VET system to supply 'job ready graduates' to industry then clearly some things must change. It is clear that completing vocational programmes should be about generating pathways for future employment and study. Indications are that achievement of Certificate III determines an individual's success in maintaining employment into the future. We should not be limiting VET funding for students to complete Certificate II only when clearly it is more productive for the community and for the future job prospects of the student to attain Certificate III or higher if they are able.

1. The value of Vocational Education and Training must be re-defined to meet the needs of learners, industry and communities. It must provide a career pathway for learners and an alternative but convergent route to education embedded into the higher education system.
2. There must be an understanding that for some young people, particularly those at risk of dis-engaging with education, it is prudent to start work based learning experiences at a younger age. SAER students often respond well to more 'hands on' education opportunities and it is not unreasonable to fund this small group of students into VET from Year 9. It is clear also that many SAER students take longer to reach 'employment readiness' than their peers and providing VET experiences in a supportive school/work environment from an earlier age will give them more chance to be work ready at the end of their schooling.
3. Teacher registration bodies must look at flexible ways that will allow the delivery of key competencies in a school-based environment. Many industries advocate for workplace delivery and assessment of VET in training packages but the sheer weight of numbers would make this impossible. An alternative (that works very well in some jurisdictions) is for tradespeople to deliver some key competencies in the VET training packages.
4. Like a teaching practicum, the quality of a work placement is often dependent upon the environment and the supervisor. All students must have access to quality industry specific workplaces. These are often difficult to find and industry must take the lead in this area.
5. VET programmes should be promoted as a pathway to higher-level post-school study both vocational and university level, rather than as a pathway directly to jobs without further training.
6. Expert career guidance is essential. Schools need support to ensure young people understand how to combine VET with their other school studies in a way that gives them the best chance of continuing in post-school training.
7. Parents and community members need to be engaged and gain an understanding that the educational opportunities and pathways available today through VET provision are an exciting and viable addition to a student's skill set. The many benefits of VET and workplace immersion and the way they can prepare young people to be job ready and employment focussed will prove to be a definitive need in the future. Unfortunately it is still the case that some parents may view this as a failure of the child's educational opportunities rather than an enhancement of them.
8. By far a common theme across schools is the need of parental and family involvement and support in any Vocational Education programme. Schools also recognise that the greatest impact on student subject selection and career advice remains through parents and are committed to working with parents to provide the best outcomes for students.
9. Funding arrangements must be 'sorted out'. According to "Role of lower-level qualifications in Australia's vocational education and training system", (ACER March 2015) enrolment patterns, demonstrate the sensitivity of enrolments to changes in funding arrangements.
10. Adequate resourcing must be provided for VET. Role of lower-level qualifications in Australia's vocational education and training system (ACER March 2015) says that the "expansion of VET as a result of the changes in the school leaving age and the embedding of VET qualifications in the

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school leaving certificates of states and territories requires additional resources if quality standards are to be met". Organising and supervising workplace learning for school students, if properly undertaken, is an expensive activity. The purchase of equipment necessary for some vocational training can also be expensive.

11. Schools must consider good practice when planning for, implementing and reviewing VET delivered to secondary students and their capacity to deliver VET.

12. There must be incentives (not necessarily financial) for more employers to consider hosting students for Workplace Learning. Education is needed so that employers realise there is value to their business and industry in general, in providing young people with 'on the job' experience that best prepares them for future employment.

13. We need a strong, reliable, consultative and collaborative TAFE system that meets the needs of all stakeholders i.e. schools, students and industry. TAFE should provide flexible / alternative delivery. To achieve this we also advocate for the following:
    - TAFE must auspice
    - Give TAFE the capacity to charge appropriately **OR** provide funding to subsidise delivery
    - Provide necessary funding to facilitate access to appropriate courses. The could one of two Funding Models:
        - Model A – give funding directly to schools / departments so that students can enrol in appropriate courses
        - Model B – link TAFE delivery of courses and funding together

14. Ideally there will be better provision of School Based Traineeships (SBT) and Aboriginal School Based Traineeships (ABST) that are:
        - Not low level
        - Linked to pathways
        - Backed by adequate numbers of placements and resourcing.

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