Addressing issues relating to unduly short courses – discussion paper

December 2017

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Introduction

Context

In June 2017, the Australian Skills Quality Authority (ASQA) released *A review of issues relating to unduly short training*[1] (the Strategic Review).

ASQA initiated its Strategic Review in response to concerns raised through its regulatory findings and previous strategic reviews that unduly short courses are preventing learners from gaining the skills and competencies required to be assessed as competent from vocational education and training (VET) courses.

The Council of Australian Governments Industry and Skills Council (CISC) met in November 2017 to consider the recommendations in the Strategic Review. CISC noted the issues and recommendations raised by ASQA which proposed a major reform to the operation of the VET system.

ASQA describes becoming increasingly concerned about the incidence of unduly short courses in Australian VET since its establishment in 2011. This concern grew out of two areas of work: ASQA's strategic reviews and its anaylysis of regulatory data.

Through its strategic reviews into the white card, early childhood education and care, aged and community care and the security industry, ASQA came to the view that inadequate training, including unduly short courses, can pose significant risk to students, fellow workers, clients and the broader community.

ASQA's strategic reviews into training for early childhood education and care, and training for aged and community care were prompted by the Productivity Commission's 2011 reports *Caring for Older Australians*, and *Early Childhood Development Workforce*.

In addition, ASQA found through its regulatory data that many registered training organisations (RTOs) may not be complying with the requirements of the national standards to provide a sufficient amount of training to ensure that learners have achieved competency.

ASQA acknowledged that other than unduly short courses, there are other issues which impact on the quality of training outcomes, for example mode of delivery, and mandatory assessment criteria. These issues might be important when considering the elements that should be included in a definition of amount of training.

Discussion paper purpose

CISC believes there is a need for broad consultation to appreciate the regulatory implications and benefits that will arise from the any reforms.

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[1] ASQA June 2017, *A review of issues relating to unduly short training*, www.asqa.gov.au/news-publications/media/asqa-releases-findings-national-strategic-review-course-duration

This paper supports CISC's intention to seek detailed stakeholder feedback on the implications from the implementation of ASQA's recommendations, which are at Appendix A.

The evidence framework for ASQA's Strategic Review

The Strategic Review involved:

- considering Australia's current VET regulatory framework and analysing various reports and research, including ASQA's previous strategic reviews and reports by other regulators
- analysing information about RTOs' compliance with amount of training requirements in the Standards for Registered Training Organisations (RTOs) 2015 for the period from 1 April 2015 to 31 March 2017
- analysing complaints made to ASQA about amount of training for the period from 1 April 2015 to 31 March 2017
- commissioning research into the regulatory approaches to course duration or amount of training adopted in other countries
- examining the websites of ASQA-regulated RTOs in the period between March 2015 and October 2015 to identify and analyse advertising about course duration.

The review considered more than 11,500 RTO advertisements showing duration for full-time courses. The advertisements analysed covered more than 1,000 training package qualifications offered by almost 1,200 ASQA-regulated RTOs. ASQA's analysis found:

- more than a quarter advertised a duration less than the Australian Qualifications Framework (AQF) volume of learning minimum
- eight per cent advertised a duration less than half the AQF volume of learning minimum.

This pattern was evident to varying degrees across all qualification levels in Australian VET.

Broader policy context

Australia's VET system plays a vital role in underpinning productivity and driving new sources of growth across Australia. To achieve this, all VET stakeholders need to be confident that RTOs and the courses they offer meet high standards. The VET system must provide properly trained employees with the skills needed to meet the challenges of today and the future. That is why all Australian governments are focused on a suite of reforms, including to the design and development of training products, which aim to ensure the quality of training.

VET places industry at the heart of determining the skills required for real jobs and affords flexibility around training duration and delivery for students and employers.

Reform of VET is focused on ensuring students and employers receive high quality training that is developed to be responsive to the needs of industry and translates into employment opportunities for individuals.

Current Australian Government quality initiatives and their intersections

The Australian Government is undertaking a number of reforms of VET focused on ensuring students and employers receive high quality training that is responsive to the needs of industry and translates into employment opportunities for individuals. This work is underpinned by a continued focus on four key strategies which aim to improve the quality of training outcomes and subsequently, the status of the VET sector:

Increasing industry responsiveness.
Improving quality and regulation.
Reforming funding and governance.
Improving access to data and consumer information.

The reforms are designed to support a VET system that gives industry and employers confidence in the integrity of students' qualifications, regardless of where they studied. The following outlines the process currently underway by the Australian Government.

1. Increasing industry responsiveness

The Australian Government is addressing the responsiveness of the national training system to industry through the Training Product Reform process. This process arose from an out-of-session decision after the November 2016 CISC meeting. It was agreed that a working party should be formed to examine and develop a case for change for enhancements to the design of training products, in partnership with industry and in consultation with the VET sector.

Further, the Australian Government, through the Australian Industry and Skills Committee (AISC) is undertaking reforms across training packages to remove obsolete qualifications from the system; make available to RTOs and consumers industry's expectations of training delivery to improve delivery and inform course choices; support movement between related occupations; create shared units available to multiple industry sectors and foster greater recognition of skills sets. These reforms are the result of a decision by CISC at the November 2015 meeting.

2. Improving quality and regulation

In November 2016, CISC agreed to reforms to strengthen regulatory practice, including strengthening civil penalties available to ASQA and further enabling the publication of regulatory decisions by regulators.

In June 2017 the Assistant Minister for Vocational Education and Skills, the Hon Karen Andrews MP announced the review of the *National Vocational Education and Training Regulator Act 2011* (the NVETR Act) and its subordinate legislation. The Review is examining how to support a responsive, effective and efficient approach to regulation to ensure quality of the national VET sector.

Following the decision at the November 2015 CISC meeting to establish a Training and Assessment Working Group (TAWG), the Working Group considered through consultations, issues around assessment and how to improve the quality of assessment. TAWG made a number of recommendations to look into strengthening the skills of trainers and assessors, improving validation of assessment, tougher regulatory intervention and provision of information to the sector.

At the same November 2015 meeting, CISC agreed the Australian Government would review the Standards for VET Accredited Courses 2012, looking at their alignment with the Standards for Training Packages 2012. The report was provided to CISC in November 2017.

One of the findings from the Review of VET Accredited Courses was strong support for retaining course duration requirements in the Standards for VET Accredited Courses 2012. A key consideration of the review was to ensure that alignment occurs where there is clear value and not merely for the purposes of alignment, particularly where the requirements strengthen the robustness of the Standards for VET Accredited Courses 2012.

In May 2017 the Australian Government announced, as part of the Higher Education Reform Package, a review of the AQF. The AQF is the policy for regulated qualifications in the Australian education and training system. The AQF Review is expected to report to Government by the end of 2018.

This discussion paper supports the initatives described above to improve quality and regulation. The Australian Government is responding to ASQA's Strategic Review on unduly short training. ASQA initiated this Strategic Review in response to concerns raised through its regulatory activities and findings from previous strategic reviews that unduly short courses are preventing learners from gaining the skills required to be assessed as competent from VET courses. At the September 2017 Senior Skills Officials' Network (SSON) meeting, it was agreed to set up a SSON working party, plus co-opted members from the AISC, to prepare advice for consideration of CISC on how to progress the recommendations in the Strategic Review.

3. Reforming funding and governance

In October 2016, the Minister for Education and Training, Senator the Hon Simon Birmingham announced the VET Student Loans Program. The new program was implemented on 1 January 2017 and: offers greater protection for students and focuses on courses that address industry needs; enhances provider eligibility and entry requirements; requires demonstrated continuing engagement in their training by students receiving the VET Student Loans; and strengthens legislation underpinning the scheme.

To complement the new program, the VET Student Loans Ombudsman function was established under the *Education and Other Legislation Amendment Act (No. 1) 2017*. The role of the Ombudsman is to manage and investigate complaints regarding the VET FEE-HELP scheme and the VET Student Loans program.

4. Improving access to data and consumer information

In November 2016, the CISC agreed to Performance Information for VET (PIVET). PIVET aims to transform the data available to consumers, governments and regulators over the next three years. This includes the creation of a RTO Performance Dashboard for consumers on the My Skills website[2], which will include accessible outcome information to inform student and employer choice. VET stakeholders including regulators including ASQA will be involved in the design of the Dashboard.

Appendix B provides more detail on the reforms the Australian Government has made to improve the quality of VET. Addressing the impact of unduly short courses will provide an opportunity for a complementary reform to those already in place.

Stakeholder engagement

To facilitate thorough and appropriate stakeholder consultation, a series of questions around implementation considerations for each of ASQA's recommendation are presented for feedback.

Stakeholder responses to the discussion questions will form the basis for consideration of CISC in responding to ASQA's recommendations.

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[2] My Skills website www.myskills.gov.au

Implementation considerations—ASQA's recommendations

Recommendation one

Recommendation summary

ASQA proposes that a definition of the 'amount of training' that focuses on supervised learning and assessment activities be included in the Standards for Registered Training Organisations (RTOs) 2015, the Standards for VET Accredited Courses 2012, the Standards for Training Packages 2012 and the Training Package Development and Endorsement Process Policy.

ASQA acknowledges the amount of training will be different for different learners and recommends that a benchmark should be set for new learners where there is a demonstrated risk from unduly short courses. Also, the report does not contend that all courses with an advertised duration below minimum of the AQF are unduly short or of poor quality. The impact is likely to be greater for those qualifications:

- with the highest enrolment numbers
- in growth industries
- offered to disadvantaged learners
- required for jobs with vulnerable clients and/or with implications for community and workplace health and safety
- in areas where qualifications are a ticket to work.

Context

The current VET regulatory framework does not explicitly define 'amount of training' or 'new learner'. Unduly short courses can prevent individuals from gainining the skills and competencies to effectively and safely contribute to the workplace and in some cases can potentially lead to significant risks to clients, fellow workers and the broader community.

Standard 1.2 of the Standards for Registered Training Organisations (RTOs) 2015 currently states that RTOs must determine the amount of training provided to each learner, taking into account: the learner's prior skills, knowledge and experience; mode of delivery; and, the proportion of training delivered. In a competency-based training environment, learners haven't traditionally been required to study for a specified number of weeks or months.

There are linkages between this recommendation and the current review of the AQF. The Australian Government has commenced a review of the AQF, to be completed by the end of 2018. The AQF's volume of learning has been identified as a focus of the review to ensure that it is able to reflect the needs of industry and the wider community.

The AQF volume of learning identifies the notional duration of all activities required for the achievement of the learning outcomes specified for a particular AQF qualification type. It is expressed in equivalent full-time years. The volume of learning allocated to a qualification should include all teaching, learning and assessment activities[3] that are required to be undertaken by the typical student to achieve the learning outcomes.

Issues raised in ASQA's Strategic Review

Regulation specific issues
The flexibility inherent in the system may be confusing for RTOs and complex to regulate effectively. The system is open to inconsistent interpretations about the amount of training required due to:

- the AQF volume of learning, which enables RTOs to assert the apparent short duration of their courses is due to the way they allocated supervised and unsupervised learning activities
- the Standards for Registered Training Organisations (RTOs) 2015 which refers to an amount of training but does not describe its components. (ASQA STRATEGIC REVIEW P9)

As the AQF range applies to qualifications rather than units of competency, there is no guidance at all provided to training product developers, RTOs, learners or regulators about the expected volume of learning for each unit of competency.(ASQA STRATEGIC REVIEW P44)

In the absence of any specific guidance to RTOs or the regulators about the amount of training required specific to the training package qualifications and units of competency, there can be differing professional judgements between RTOs and the regulator about the required amount of training. (ASQA STRATEGIC REVIEW P50)

There is inconsistency in how 'amount of training' is regulated for training packages and accredited courses (the two types of nationally recognised training products). While training packages mostly do not set requirements for duration, accredited courses must include nominal times. (ASQA STRATEGIC REVIEW P56)

There are many different definitions and measures of duration currently in use
Course duration is determined and used by other agencies for a variety of purposes outside of the regulatory framework set for ASQA. The impact of these contribute to regulatory burden for RTOs and diminished transparency for consumers. (ASQA STRATEGIC REVIEW PP9-10)

These purposes include:

- the nominal hours set for national reporting purposes, which are seen as a critical tool for policy development, evaluation and accountability in the system
- the nominal hours used by funding and purchasing agencies to ensure some quality measure around what they are buying
- the nominal durations in apprenticeships sought by industry to provide an assurance about the competence of graduates

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[3] These activities may include some or all of the following: guided learning (such as classes, lectures, tutorials, on-line study or self-paced study guides), individual study, research, learning activities in the workplace and assessment activities. Source: www.aqf.edu.au/sites/aqf/files/volume-of-learning-explanation-v2-2014.pdf

- the durations mandated by occupational licensing regulators due to their concern about short duration VET qualifications. (ASQA STRATEGIC REVIEW PP55-56)

Australia's system compared internationally

Australia's approach differs significantly from other major VET systems, most of which allocate unique notional learning times to each qualification. (ASQA STRATEGIC REVIEW P10)

Credit value in some countries (the end result of which is a notional learning time) is used to:

- enable transparency to ensure prospective learners and their employers understand the relative weight of units and the notional learning hours required to achieve competency in the qualification
- develop arrangements that enable credit accumulation and transfer of learning outcomes between qualifications, education environments and countries. (ASQA STRATEGIC REVIEW PP59-60)

1.	**Discussion questions for recommendation one**
1.1.	What are the important elements in a definition of amount of training in a competency-based training system? What is your suggestion for a definition of 'amount of training'?
1.2.	Where in the regulatory framework would this definition best sit to improve student outcomes?
1.3.	If an amount of training is defined, how can industry ensure that innovation and flexibility in delivery of training is retained? What criteria could be used to ensure the RTO has the scope in which to justify its rationale for shorter course duration?
1.4.	For qualifications that would have a prescribed duration, what are the implications for recognition of prior learning, credit transfer and transition of students when qualifications are updated?
1.5.	What is your suggestion for a definition of 'new learner'? What processes would an RTO need to establish to verify a student's new learner status? What documentation would support audit processes?
1.6.	In establishing a definition of amount of training, what are the implications for current definitions of volume of learning in the AQF? How could the definition of an amount of training (which includes only supervised learning activities) best be aligned in order to inform the review of the AQF and volume of learning (which currently includes supervised and unsupervised learning activities)?

Recommendation two

Recommendation summary

ASQA proposes the development of a risk-based approach to the inclusion of an appropriate amount of training when training packages are revised or developed by industry reference committees (IRCs).

Previous reviews by ASQA have provided evidence of risk to quality in a number of sectors—aged and community care, early childhood education and care, security operations, equine programs, construction safety and training and education—and these sectors are identified in the recommendations as priorities and could be considered by their IRCs for the inclusion of a mandatory amount of training.

Just as in Recommendation 1, the impact of unduly short courses is likely to be greater in those qualifications with high enrolment numbers, are needed to skill workers in growth industries, are offered to disadvantaged learners and are necessary for those working with vulnerable clients or with implications for community or workplace health and safety.

Further, the Australian Workforce and Productivity Agency[4] identified a range of other diverse and complex factors which impact on the delivery of high quality training. This included the quality of teaching and training, perceptions of inadequate funding and inadequate support for disadvantaged learners.

Context

The AISC was established by CISC to approve nationally recognised training packages for the VET system. The AISC draws on advice from its network of IRCs that are the primary channel for industry advice and the formal point through which industry requirements for skills are considered and defined in training packages. IRCs work in a voluntary capacity and comprise people in industry, including employers, peak bodies, unions and industry experts.

From training packages, RTOs design courses that deliver the skills and knowledge identified in the training package and tailor it to local industry, employer and learner needs.

Issues raised in ASQA's Strategic Review

Factors that increase the risk for unduly short courses
Many providers offer good-quality training; however, these providers are facing increased pressure to either reduce quality or leave the market because they cannot compete with providers offering unduly short and inadequate training programs. (ASQA STRATEGIC REVIEW P4)

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[4] Australian Workforce and Productivity Agency, March 2013, *2013 National Workforce Development Strategy* https://docs.education.gov.au/system/files/doc/other/futurefocus2013nwds-2013.pdf

The impact is likely to be greater for those qualifications:

- with highest enrolment numbers (indicates market demand and extent of risk)
- needed to skill workers in growth industries
- offered to disadvantaged learners
- required for job roles with vulnerable clients or with implications for community or workplace health and safety. (ASQA STRATEGIC REVIEW P11)

State and territory imposed licensing requirements can lead to significant variation in the licensing requirements that apply in different jurisdictions and can, perversely, lead to further reduction in the quality of VET outcomes. (ASQA STRATEGIC REVIEW P54)

The lack of specification is increasing the risk of poor-quality training, where a number of factors are driving short duration courses:

- a highly competitive marketplace, where a shorter duration is often marketed as an RTO's primary point of difference with unscrupulous providers willing to respond to demand for unduly short courses and more reputable providers forced to compete or to exit the market
- pressure to respond to learner and/or employer demand for duration to be reduced for qualifications required as the basis of gaining or maintaining employment
- poor-quality assessment practices and inadequate trainer and assessor competencies as identified in ASQA's previous strategic reviews. (ASQA STRATEGIC REVIEW P105)

The level of risk posed by unduly short courses increases where there is a correlation between short duration and high enrolment numbers. As AQF Certificate lll and Diploma courses are the most widely utilised Australian VET qualifications, impact of unduly short courses is potentially significant. (ASQA STRATEGIC REVIEW P102)

Other issues that impact on quality
There are other issues affecting quality of training, often interrelated with unduly short courses and there is a need for complementary measures to address their impact, for example, the quality of assessment. The recommendations from this review are designed to contribute to the recommendations from the TAWG to improve the quality of assessment in VET, and more broadly to:

- the AQF Review
- the review of the NVETR Act and subordinate legislation
- ongoing enhancements to the My Skills website to improve quality and accessibility of information for consumers. (ASQA STRATEGIC REVIEW P11-12)

ASQA's research for this review found that many other countries include assessment of student outcomes, as well as duration, as part of their quality frameworks. In contrast, Australia leaves both these aspects as essentially internal RTO processes. (ASQA STRATEGIC REVIEW P106)

2.	Discussion questions for recommendation two
2.1.	How well are IRCs equipped to provide technical expertise on course delivery arrangements to be able to determine an appropriate amount of training? Who is best placed to provide the technical expertise to IRCs to assist in determining an appropriate amount of training? How do RTOs provide input given they are largely excluded from IRC participation?
2.2.	ASQA has identified a range of factors that increase the risk for unduly short courses (page 11). Do you agree with these factors? Are there any other factors that should/could be considered in the context of unduly short courses?
2.3.	What other sectors, other than those identified by ASQA, would benefit from this risk based approach to training package development? How did you identify these sectors (for example, what factors regarding this sector were relevant in making this opinion/decision?)
2.4.	Do recent and proposed changes and reforms in the VET sector contribute to dealing with these issues, and are there alternative ways to achieve the same goal?

Recommendation three

Recommendation summary

ASQA proposes that RTOs would be required to publish a product disclosure statement (PDS) that includes the range of learning activities expected for each training product on their scope of registration. The PDS, to be developed by the Australian Government Department of Education and Training (the department), would be available on RTO websites and the RTO's entry on the My Skills website.

Context

The VET information landscape is viewed as complex by consumers, particularly in comparing information about courses at different RTOs from an authoritative source. The department is working with VET stakeholders to improve the availability of course level information for consumers.

The My Skills website continues to be a trusted source of course and RTO level information for many VET consumers, with annual usage tracking towards two million visits in 2017. As part of the PIVET reforms, the department will work with RTOs to improve course level information on the My Skills website in 2018, including developing ways to improve how consumers may compare courses between RTOs through the RTO performance dashboard.

The Australian Government has also asked an independent review, Professor Valerie Braithwaite, to consider consumer protections during her review of the NVETR Act.

Issues raised in ASQA's Strategic Review

Consumers do not have the information to inform choice
Competition is currently not driving up quality—consumers do not have sufficient information to make informed choices, due to inconsistency in how courses are advertised, use of different terminology and meanings of duration, and different measures of time making direct comparisons difficult. There are lessons from overseas to improve this. (ASQA STRATEGIC REVIEW P11)

Assigning a credit value to individual qualifications helps prospective learners and employers understand their relativity and the likely time involved in the learning and assessment process. (ASQA STRATEGIC REVIEW P66)

The diversity of RTOs' advertising about course duration makes comparisons challenging and some RTOs do not advertise course duration at all. (ASQA STRATEGIC REVIEW P69)

Providing information in a consistent way is not mandatory
The My Skills website includes course duration information that is voluntarily self-reported by RTOs. While this provides some information to consumers about the available offerings, its value is limited. Not all RTOs report duration, and where they do, it is not presented consistently in a way that enables comparisons to be made. Also absent is information about what industry regards as the appropriate duration of courses. (ASQA STRATEGIC REVIEW P70)

3.	Discussion questions for recommendation three

3.1.   What impact and costs would a provider face in implementing ASQA's proposal?

3.2.   What impact would this have on the flexibility of RTOs to deliver training?

3.3.   How could a PDS take into consideration the various flexible and innovative ways in which a single training product may be undertaken?

3.4.   What would trigger an RTO to update each PDS?

3.5.   Are there alternative ways in which training product information could be provided to students to enhance consumer protections, and at which point in their enrolment/training should this be provided?

Next steps

How to provide feedback

Stakeholder consultations begin with the release of this discussion paper in December 2017 and continue through to March 2018.

Respondents may provide feedback on some or all of the discussion paper's themes. To assist with the compilation and analysis of the views of all stakeholders, respondents are encouraged to provide feedback via the discussion paper submission portal, available on the department's website at www.education.gov.au/VET-consultation. Submissions in alternative formats will also be accepted.

Written responses will be made publicly available on the department's website, unless respondents direct otherwise. Terms and conditions for public submissions are available on the department's website at www.education.gov.au/terms-and-conditions-public-submissions-department-education.

How feedback will inform policy decisions

Stakeholder responses to the discussion questions will form the basis for CISC's considerations in responding to ASQA's recommendations.

Appendixes

Appendix A – Recommendations from ASQA's Strategic Review

Recommendation 1

That the Standards for Registered Training Organisations (RTOs) 2015 be amended to include a definition of the 'amount of training' that focuses on supervised learning and assessment activities

1.1. A comprehensive definition of the term 'amount of training' be included in the Glossary of the Standards for Registered Training Organisations (RTOs) 2015 specifying the supervised learning and assessment activities that are included.

1.2. The definition of the 'amount of training' be agreed through a consultative process commissioned by the Department of Education and Training and led by the Chair of the Australian Industry Skills Committee involving key stakeholders including industry, RTOs and government representatives.

1.3. Once finalised, the term 'amount of training' be adopted in the Standards for VET Accredited Courses 2012 and associated VET Accredited Course requirements and documentation; and the Standards for Training Packages 2012 and the associated Training Package Development and Endorsement Process Policy.

1.4. The current Review of the Australian Qualifications Framework give consideration to the issues raised in this report in relation to the application of the AQF to the VET sector.

Recommendation 2

That training package developers be able to respond to industry-specific risks by setting mandatory requirements, including an amount of training

2.1 The Australian Industry and Skills Committee, in consultation with industry, IRCs, SSOs, VET regulators, NCVER and government training agencies, develop a formal process to identify and address risks to the quality of training and assessment which is to be applied consistently by IRCs when developing or revising training products.

2.2 Where there is evidence that the consequences of poor quality training delivery pose an unacceptable risk to the learner, workplace, community or environment, IRCs be required to develop a risk mitigation strategy which may include specifying training delivery and assessment requirements, including the amount of training appropriate for a new learner, in the endorsed components of training packages as a mandatory requirement; or the companion volume as guidance.

2.3 As part of its role in approving training packages for implementation, the Australian Industry and Skills Committee confirm the appropriateness of any training delivery and assessment requirements specified by an IRC and its capacity to mitigate the identified risk(s).

2.4   Where they are stipulated, RTOs be required to implement the 'training delivery and assessment requirements' specified in the endorsed components of training packages unless they are able to present a rationale that justifies their delivery arrangements (for example, that their learner cohort had previous industry experience).

2.5   Given the considerable risks already documented by ASQA in this and previous reviews, the IRCs responsible for the following training packages and skill sets be asked to respond to the risks, including giving consideration to specifying a mandatory amount of training appropriate for a new learner as a matter of priority for the following sectors:

- Aged and community care

- Early childhood education and care

- Security operations

- Equine programs

- Construction safety ('White Card')

- Training and Education.

Recommendation 3

That RTOs be required to publish Product Disclosure Statements that include the range of learning activities expected, including the amount of training, for each training product on their scope of registration.

3.1   The Department of Education and Training develop a template for a Product Disclosure Statement in a standard, easy-to-understand format that requires RTOs to specify the key features of their training and assessment strategy, including the amount of training.

3.2   Every RTO be required to publish a corresponding 'Product Disclosure Statement' for each training product on scope which reports on the amount of training being provided by the RTO that corresponds to either the mandatory or recommended amount of training specified by the IRC or, where these parameters have not been set through the training packages, the volume of learning in accordance with the definition of amount of training in recommendation 1.

3.3   Every RTO be required to provide each prospective and current learner with the relevant Product Disclosure Statements.

3.4   All Product Disclosure Statements be made freely available through each RTO's website and the information included in or linked to any marketing of qualifications.

3.5   Every RTO be required to make its Product Disclosure Statement(s) available on the Australian Government's My Skills website so that employers and prospective learners can easily understand what is needed to achieve the training outcome, be clear about the RTO effort that will go into its learning and assessment they will receive in return for the cost of the training program, and be able to readily compare the offerings of RTOs.

Appendix B – Australian Government VET quality reforms

Increasing industry responsiveness

Training Product Reform
In November 2016 CISC agreed to examine and develop a case for change for enhancements to the design of training products, in partnership with industry and in consultation with the VET sector.

The Joint Working Party has been examining the case for change for enhancements to training products by considering:

- future workforce needs as the economy and skills needs change, and appropriateness of the design of training products in meeting these needs
- strengths and weakness of the current training system related to the design and use of training products, and associated development processes
- the appropriateness of training products in the provision of foundation, employability and future work skills to provide for an adaptable workforce with transferable skills
- how quality might be improved through training product design and associated development processes.

In November 2017, the Joint Working Party reported to CISC on the case for change and recommended next steps. Next steps will include a consultation process to seek feedback on specific proposed changes. It is anticipated the Joint Working Party will subsequently report back to CISC at their first meeting in 2018 for further decision on implementation of any proposed change.

Unduly Short Courses
In September 2017, SSON agreed to set up a SSON working party, plus co-opted members from the AISC, to prepare advice for consideration of CISC on how to progress the recommendations in the Strategic Review.

ASQA initiated the Strategic Review in response to concerns raised through its regulatory activities and findings from previous strategic reviews that unduly short courses are preventing learners from gaining the skills required to be assessed as competent from VET courses.

The working party met twice to consider how the recommendations arising from the Strategic Review could be implemented. Members of the working party indicated that a range of issues would need to be addressed during implementation particularly:

- striking the right balance between the needs of ASQA in successfully carrying out its regulatory role and unintended perverse outcomes for the national training system and
- how this initiative integrates with other quality initiatives already underway, for example the review of the NVETR Act and the reforms to training products.

The Working Party reported back to CISC in November 2017 on the discussion paper and proposed next steps. Next steps will include a consultation process to seek feedback on specific proposed changes. It is anticipated the Working Party will subsequently report back to CISC at their first meeting in 2018 for further decision on implementation of any proposed change.

AISC Training Package Reforms

In November 2015, CISC agreed to reforms to training packages to:

- ensure obsolete qualifications are removed from the system
- ensure that more information about industry's expectations of training delivery is available to RTOs to improve their delivery and to consumers to enable more informed course choices
- ensure the training system better supports individuals to move more easily between related occupations
- improve the efficiency of the training system by creating units that can be owned and used by multiple industry sectors
- foster greater recognition of skill sets.

Improving quality and regulation

Review of the NVETR Act

In June 2017, the Assistant Minister for Vocational Education and Skills, the Hon Karen Andrews MP, announced a review of the NVETR Act and its subordinate legislation. Since the introduction of the NVETR Act in 2011, Australia's regulatory landscape has experienced significant change with the introduction of new standards for RTOs in 2015 and the VET Student Loans program in 2017. In this context, it is timely and appropriate to undertake a review of the NVETR Act.

The review will examine the extent to which the NVETR Act supports a responsive, effective and efficient approach to regulation to ensure the quality of the national VET sector. An independent reviewer, Professor Valerie Braithwaite, is leading this review with support being provided by the Department of Education and Training and an Expert Advisory Panel.

The review will seek the views of major stakeholders, invite submissions from the public, and draw on available information and data about the VET sector. The review will report to the Assistant Minister for Vocational Education and Skills by the end of 2017.

Training and Assessment Working Group

In November 2015, CISC agreed the TAWG would consult with the VET sector on assessment and ways to improve the quality of assessment. TAWG reported to the November 2016 CISC meeting and made seven recommendations around:

- approaches to strengthening the skills of trainers and assessors
- consideration of improved validation of assessment
- options for tougher regulatory intervention
- provision of information to the VET sector.

Review of the alignment between the accredited courses and training package standards

In November 2015 CISC decided to undertake a process to review the Standards for Accredited Courses 2012 to ensure they align with the Standards for Training Packages 2012.

The review has been technical in nature and targeted at the alignment of the standards rather than accredited courses more broadly. It has been progressed in collaboration with the states and

territories, and in consultation with the VET regulators and other key stakeholders. A key consideration of the review has been to ensure that alignment occurs when there is clear value and not merely for the purposes of alignment, particularly where it is more appropriate to retain requirements where they strengthen the robustness of the Standards for VET Accredited Courses 2012.

The department reported to CISC in November 2017 on recommendations to align the Standards for Accredited Courses 2012 with the Standards for Training Packages 2012. Next steps include working with the states and territories and VET regulators to draft changes to the Standards for VET Accredited Courses. This will be provided to CISC for agreement in mid-2018.

Review of the Australian Qualifications Framework
In May 2017, the Australian Government announced as part of the Higher Education Reform Package that it would conduct a review of the AQF. This review follows from a commitment made to states and territories by former Minister for Education, the Hon Christopher Pyne MP, the AQF would be reviewed every three to five years. Any revisions of the AQF that are developed as part of this review will be submitted to the COAG councils responsible for VET, higher education and secondary school education for approval.

Reforming funding and governance

Reforms to VET FEE-HELP—VET Student Loans
VET Student Loans commenced on 1 January 2017, replacing the VET FEE-HELP scheme. The program offers income contingent loans to eligible students studying Diploma level and above VET qualifications at eligible providers.

VET Student Loans offers greater protection for students and focuses on courses that address industry needs, creating better opportunities for employment. Provider eligibility and entry requirements have been enhanced, ensuring only high quality providers with a strong track record are approved. Students are periodically required to demonstrate their continued engagement in their training via an online process. Finally, the *VET Student Loans Act 2016* is strengthened compared to previous legislation, and allows the government to quickly withhold payments to providers and suspend or revoke their approval in the event of underperformance or non-compliance.

VET Student Loans Ombudsman
The Australian Government established the VET Student Loans Ombudsman within the Office of the Commonwealth Ombudsman to manage and investigate complaints regarding both the VET FEE-HELP scheme and the new VET Student Loans program. The Ombudsman assists people who believe they may have a VET FEE-HELP or VET Student Loans debt they should not have, as well as help students who feel they have been treated unfairly by their VET FEE-HELP or VET Student Loan approved provider. Services are free, independent and impartial. The Ombudsman commenced 1 July 2017.

Improving access to data and consumer information

Enhancements to the My Skills website to increase consumer information on RTOs and courses
In November 2016, CISC agreed to Performance Information for VET (PIVET) to transform the data available to consumers, governments and regulators over the next three years. This includes the creation of a RTO Performance Dashboard for consumers on the My Skills website, which will include accessible outcome information to inform student and employer choice. VET stakeholders including regulators will be involved in the design of the Dashboard.

The PIVET roadmap comprises nine complementary projects:

- PIVET Project 1: RTO performance dashboard
- PIVET Project 2: Strengthening RTO price disclosure
- PIVET Project 3: VET survey instrument review
- PIVET Project 4: Data linkage for student pathways and outcomes
- PIVET Project 5: Completions rate methodology review
- PIVET Project 6: Data policy and standards review
- PIVET Project 7: Total VET activity (TVA) reporting review
- PIVET Project 8: Streamlining VET data collection
- PIVET Project 9: VET finance collection review.

Progress to date has set the underlying policy and methodological groundwork for PIVET reform, and the major public facing impacts of PIVET will launch in 2018.