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The VET Gazette is a collection of information and relevant stories about goings on in the Vocational Education and Training sector. The VET Gazette is a free publication distributed intermittently to RTOs and contains stories and articles that hopefully will be useful, with relevant information for everyone.

Our philosophy is **to keep the information simple and in everyday language, with explanations of what often seems confusing.**

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## Course Durations and Quality Outcomes

We frequently read about the quality of education as being of concern and often the catalyst of new RTO standards being released, reforms announced and late last year, a Senate Inquiry being established. Whilst I welcome the opportunity to enter the discussion as to why the Senate inquiry only focusses on the private side of the VET sector when matters of (poor) quality can arguably, be found in the private and public sectors, I am more interested in exploring one of the terms of reference of the inquiry and how this will impact on the VET sector more broadly.

Listed as one of the terms of reference is:

*the quality of education provided by private VET providers, volume of learning requirements and graduate outcomes.*

What I am particularly keen to explore is the link between the duration of a course and the quality of the outcome. I have been very vocal over some years about short duration courses not delivering good outcomes from a general industry perspective. A one week course might seem a good outcome for the student who needs the qualification to start or seek work, but in the long term does the accelerated learning pathway provide a good outcome for the broader industry?

Whilst the AQF has been part of the Australian VET landscape since 1995, the term 'volume of learning' first appeared in the revision to the AQF in First Edition July 2011 and the following offered:

*A volume of learning is included as an integral part of the descriptor for each qualification type. The volume of learning is a dimension of the complexity of the qualification type. It 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.*

As the AQF is used across the whole tertiary education system in Australia, we can very easily see that the volume of learning associated with a particular qualification is not a new concept although for some reason part of the VET sector's approach towards a person acquiring competence in a very short time has been overlooked or ignored. Higher education providers have, for many years, set the volume of an undergraduate degree at (typically) 3-4 years for example. What has been concerning is that parts of the VET sector, without such traditions or guidelines, have watered down the duration of courses in order to maximise profits resulting in credentialising people rather than skilling them. Many people are critical of the regulator for such inaction but we can't lay blame with them as they can only audit a set of rules and where there are none, they have their hands tied. If we are to point the finger for not having a guideline, it may be at the Industry Skills Councils (ISC) for failing to document indicative durations in qualification structures.

Before discussing the overall impact of the volume of learning, at this point it is worth making a distinction which some people may find conflicting. The 'volume of learning' is not the same as 'nominal hours' for a few reasons. The volume of learning is a dimension of a qualification and includes all activities undertaken by the 'giver' and 'receiver' of the education/training, i.e. trainer and learner. This may include structured delivery, directed learning, self-directed study and formative and summative assessment for example. Nominal hours, on the other hand, applies to individual units of competency and relates only to supervised training. Nominal hours do not take into account the breadth and depth of learning undertaken by the student nor time spent on formative and summative assessment.

The volume of learning is really designed for use by the Industry Skills Councils and course developers in the development of qualifications. It may be useful for RTOs in designing their delivery and assessment approaches but that is not its primary purpose which leads me to the crux of the issue.

The new standards for RTOs 2015 introduce another term in clauses 1.1 and 1.2 when they refer to the 'amount of training' and the RTO is required to justify the amount of training they provide in keeping with the requirements of training packages and accredited courses. With a few exceptions, training packages generally don't provide this sort of guidance so we have to look at the AQF as the guiding document. That is of course, unless those that develop training packages start providing more direction when it comes to course durations.

So question one, 'is the amount of training and the volume of learning one and the same?'

By definition I would say no. The amount of training provided seems to be limited to a quantity of input provided to the learner by the provider. The volume of learning, as already defined, is much broader than that. So we might say that the amount of training is a subset of the volume of learning.

I applaud the re-introduction of the User's Guide for the new standards (AQTF 2001, 2005 and 2007 had great User Guides) but I am perplexed when the guide relevant to clauses 1.1 and 1.2 tries to elaborate on the duration of training by directly referencing the volume of learning indicators which, by my reckoning, are not the same. As stated earlier, the volume of learning was introduced for ISCs and course developers when developing qualifications and courses NOT as a guide to developing delivery strategies.

Before making the point regarding the ongoing regulation of this standard, I must state that I do not agree with courses being accelerated at ridiculous rates such as my old favourite TAE40110 Certificate IV in Training and Assessment being done in a week. I certainly want to see an end to it immediately. However, I am concerned that auditors may cling to the broad explanation in the User's Guide and penalise RTOs without there being a defensible stance. By the way, the User's Guide is NOT an auditable document and as its name suggests, is a guide only.

But what happens when the RTO presents a training and assessment strategy which outlines a course duration that is nowhere near what the guide suggests?

This is difficult for auditors as well as the RTO because it remains very subjective. The problem is that in some instances the auditor's subjective view will override the RTO's subjective view creating a non-compliance when it seems that no one is right and no one is wrong. I have read too many audit reports where a non-compliance is called but the reason given is just a broad general statement which doesn't offer the RTO any clarity about rectifying the matter.

Clearly, the variation in course durations across the training market is enormous. By way of example, I used the Google search engine and randomly selected twenty RTO websites who offered information regarding a Certificate III in Business Administration – BSB30412.

Ten of the websites did not advertise a course duration. The ten that did, outlined a course duration that ranged from two weeks, full time, face to face with assessment included, to 11 hours per week over one year (information didn't specify the breakdown of the 11 hours), to the CRICOS course with its obligatory 28 weeks at 20 hours per week.

Compared to the volume of learning indicators table in the User Guide to the RTO standards 2015 (cut and pasted from the AQF), a Certificate III should have a duration of one to two years or be 1200 – 1400 hours in duration. Doing some quick sums, we have courses here that are 80 hours, 440 hours (based on a 40 week academic year) and 560 hours.

Now, on face value we might suggest that the latter two examples of courses seem to have adequate durations (the first one doesn't) but only the middle one technically meets the guideline of one year although the hours are only 36% of what is recommended. What we don't know, is how much self-paced study is required, whether there is a work placement included that hasn't been factored etc.

Here's my regulatory dilemma. How does an RTO justify that the second and third course examples given here, which seem adequate on face value, are likely to provide a quality outcome? In the discussion between the RTO and the auditor, when looking at the strategy for this course, how are quality outcomes to be measured? What does the regulator do if they find (at audit) that the intent of the strategy and the practice of delivering training do not align?

As the AQF was fully implemented on January 1, 2015, is ASQA going to conduct some basic research (as I did) and ask every RTO whose website suggests they can complete courses in a few short weeks, to show cause? If not, why not? Under the current system, if the RTO is low risk they may not be audited for years during which time they can continue to deliver a course which has a duration of 6% of what is recommended? (An 80 hour course is 6% of the minimum suggested 1200).

Are Skills Councils going to step up to the plate and start putting some clear, workable guidelines in their unit evidence guides so that the regulator has got something to work with?

Will the State funding bodies chat to ASQA so that we have a single set of rules/guidelines regarding course durations for funded courses? Can we get an idea of how nominal hours and the volume of learning/amount of training are related? Are we going to simply get rid of nominal hours (which makes good sense)?

Let's make 2015 the year of real improvement in VET provision rather than just continuing the conversation about 'quality outcomes' which seems to have been dragging on for many years with no obvious resulting improvement. There's a very simple distinction between change and improvement. Now is the time to realise that.

## RTO Standards 2015

Clearly there is a number of considerable changes in the new standards and while I am really pleased to see the regulator getting out and talking to the punters, I wonder whether half a day of interaction was enough. I believe that the transition needs more attention.

In the meantime, here's a very brief summary of what appears to be the big ticket items from **Standard 1 only**. Keep in mind that of the 8 Standards in the new framework, Standard 1 is by far the biggest.

- Amount of training / course durations – as outlined in the main article. Much of this will be based on analysing the existing skills and knowledge of students who enrol in courses.
- Industry engagement now has a broader application. Where in the past, the outcomes of industry engagement was usually restricted to the development of the training and assessment strategy (a front end process), the requirement now expands to ensure that industry engagement outcomes influence strategies, practice and resources including the currency of the RTOs human resources (trainers/assessors). The standard also requires the RTO to implement a range of strategies for industry engagement.
- Assessment validation – now includes the requirement for a plan to be implemented outlining the who, what, when, and how of validation. Validation now includes what we have known as moderation.
- A sampling approach must be taken to validation with some parameters as to how often each training product is to be validated.
- Validation must be undertaken by a person or persons who were not directly involved in the training or assessment of the training product being validated. There are rules around who may validate, similar to those applied to trainers/assessors.
- More clarity about the requirement that an RTO must offer RPL.
- Trainers and assessors – more clarity about qualifications they must hold or show equivalence to, team assessing and working under supervision. Supervised individuals are to be better monitored. Showing equivalence for trainers/assessors is not an option after January 2016.
- Professional development now only mentions VET related PD.
- After January 2017, anyone who wishes to deliver TAE40110 must hold a TAE diploma or an adult education qualification higher than a Diploma.
- Transition from superceded or deleted courses/skill sets/units is now incorporated in the standards rather than a general direction. Teach out periods are no longer mentioned.

### Auditor's Tip

#### Attention to detail

From time to time I see a trend in audit reports which is not necessarily one of the typical 'offenders' like the validity of assessment tools or lack of evidence of industry consultation. In fact I have seen this one on quite a few reports and often think that the non-compliances are quite trivial.

It is an assessment related issue but not so much about the validity of the assessment. Some auditors are really going to town on assessment instructions which are part of the overall assessment tool. *So be careful with your words and make sure that what you write is very clear.*

In the words of Marcus Quintilianus, the Roman rhetorician,

*"We should not write so that it is possible for [the reader] to understand us, but so that it is impossible for him to misunderstand us."*

### New Standards Workshops

#### *An in-depth analysis*

Wheretofromhere will be running full day workshops throughout Queensland in February focussing on the major changes of the new RTO Standards. In particular, a detailed discussion about the impact the new Standards will have on an RTOs operation.

More information on the [website](#)

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