



Department of Prime Minister and Cabinet

**Expert review of Australia's vocational  
education and training system**

January 2019

1. The Independent Education Union of Australia (IEUA) is pleased to have the opportunity to make a submission to the expert review of Australia's vocational education and training (VET) system.
2. The IEUA is the federally registered industry union representing all employees in Catholic, other faith-based, community and independent schools, early childhood education and care centres, and post secondary centres across all the states and territories of Australia. While the majority of IEUA members are teachers, the membership also includes workers engaged as teacher assistants, administrative staff, gardeners, cleaners and caterers. It has a current membership of approximately 75,000 members.
3. The IEUA has a particular interest in VET because of the number of members employed in the post-secondary VET and English Language Courses for Overseas Students (ELICOS) sectors where the ELICOS providers are also registered as part of the VET sector. With schools being close to 10 per cent of the total number of VET providers there is also a large number of VET teachers employed in the non-government schools' sector<sup>1</sup>.
4. The importance of VET to Australia's education system is shown by the 2017 statistics published by the National Centre for Vocational Education Research (NCVER)<sup>2</sup>. NCVER states that just less than one quarter (24.1%) of Australia's population between the ages of 15–64 years participated in VET in 2017. The highest participation rate was for teenagers in the 15-19 years bracket where almost one half (46.1%) of the population was enrolled in a VET subject or program. These participation rates have remained constant but truly, through overall population increase, reflect an increase in the number of participants.
5. These statistics spell out the value Australians place on continued skills training and the need for the VET system to be of the highest quality. Disappointingly, Australia's governments have continually reduced real funding levels over the past decade leaving the sector to educate more students with less and less funds. This chronic underfunding of the sector is leading to the demise of the Tertiary and Further Education (TAFE) system and pushing the private for-profit sector to prioritise profits over quality.
6. The loss of quality in the sector is reflected in a number of ways. Firstly the sector is losing teaching expertise with a large number of experienced and quality teachers leaving VET. This is leaving the sector with an inexperienced workforce responsible for designing and developing courses, resources and assessments in RTOs as well as implementing these in the classroom. Too often the union has visited an RTO and found the person in charge of materials has been placed in a position of management because the RTO cannot locate anyone from a particular industry and has used the 'well that person will do' approach. Unfortunately this approach is all too rampant. On other occasions it is found that the person in charge has no recent experience in their field so the training provided is not current.
7. Members have expressed to the union the desire to compensate for the organisation's/RTOs incompetence when delivering courses/packages that are not

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<sup>1</sup> NCVER 2018, *Australian vocational education and training statistics: Total VET students and courses 2017*, NCVER, Adelaide, p.7.

<sup>2</sup> Ibid.

up to standard. Members have described to the union of courses being sold as Diplomas but really are only at a Cert III level. Obviously this is not good enough!

8. As part of the Standards for Registered Training Organisations (2015) each RTO is to ensure that trainers and assessors receive professional development (PD) to ensure industry relevance and knowledge, and competency based training and assessment as applied to vocational education and training. The IEUA receives a number of complaints about RTOs giving little to no support for trainers and assessors to undertake professional development. Members tell the union that much PD is irrelevant, information about PD sessions is just given out on pamphlets, and attendance at sessions is to be in their own time and own expense.
9. Secondly, a number of students are graduating from their courses without receiving the necessary on the job training hours because they have completed the course on-line or the provider was unable to provide them with a work placement. And in other cases teachers/assessors are placed under pressure to sign off on students' courses even when the student has not yet fully demonstrated the capability of completing the required task.
10. The union heard recently of the following example. An industry employer in Western Australia was looking to hire a person for an OH&S Compliance management position and interviewed an applicant who had a Cert IV qualification in OH&S. When asked how they obtained the qualification the applicant replied they approached a Registered Training Organisation (RTO) and requested to go through the recognition of prior learning (RPL) or training process. The RTO asked the applicant to provide their job description, current resume and an amount of money to pay for the certificate (Cert IV) which they received in the mail a week or so later. The applicant confirmed there was no assessment or demonstration of any skills required. Needless to say the applicant was not successful in getting this position but it was thoroughness of the employer's questioning that brought to light the means used by the applicant in acquiring the qualification. Many employers would assume that if a person has a qualification that they have the necessary skills, knowledge and training to put this into practice.
11. Fraudulent qualifications are not unusual. Late last year three ex-employees of an RTO were arrested for their part in allegedly issuing fraudulent qualifications and money laundering<sup>3</sup>. It is crucial that the VET system is of the highest standard so that trust and integrity in the system can be maintained. There is too much to risk, including people's lives, if fraudulent operators are allowed to prosper.
12. Thirdly, underfunding has seen for-profit RTOs begin to protect their profit margins rather than protect the quality of their staff, resources and training. The final result of cost cutting measures used by the RTOs has seen an increase in student numbers for courses. In other words, quantity is now more important than quality. It has been well documented and reported the aggressive recruiting of some unscrupulous RTOs targeting the disadvantaged in the community, who would most likely be unable to complete the courses or repay the debts, so as to receive government funding.

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<sup>3</sup> <https://www.asqa.gov.au/news-publications/news/nine-people-arrested-relation-alleged-forgery-documentation-trade> Nine people arrested in relation to alleged forgery of documentation for trade qualifications – Australian Government, 20 December 2018 (accessed 24 January 2019).

13. A further complaint the union receives from members is that not all RTOs are transparent when going through the audit process. This has seen members enrol, pay, complete a course, receive the certification and work in an industry only to be informed at a later date that their certification is no longer valid because the RTO that issued the qualification did not comply with the regulatory standards at the time.
14. This happens when an RTO involved in the audit process doesn't comply with the standards but has been given extra time to submit further evidence. This isn't communicated to students at the time although the RTO can continue to deliver, market and advertise. Later when the student's certification is cancelled because the RTO did not comply with the regulatory standards the only course of action the student can take to get their money back is by suing the RTO. Sometimes this is to no avail as the RTO has gone into liquidation or closed down.
15. The VET system has been a key player in Australia's education system in the past and needs to be rebuilt to claim back this prominence. The VET sector allows students and workers to develop the skills and knowledge necessary to enter the workforce and move into higher-skilled, better paying positions. It is important for workers returning to the workforce, those undergoing retraining, those needing to complete refresher courses and those who wish to complete transition courses before attending university.
16. For VET to regain its reputation TAFE must be re-energised and highly resourced across the country. The TAFE system is most important in building the skills of workers and students in regional areas. Rebuilding TAFE will reinstall faith in VET and remove some of the concerns the public has about private providers prioritising profits over quality. For long term planning TAFE should receive a funding guarantee.
17. The VET system needs to have qualifications fully recognised across Australia based on national standards. Workers need to know that a qualification acquired in one state or territory will be recognised by other states and territories if they are required to move to another jurisdiction as part of their current position or on taking up a new job.
18. Industry and employers receive many benefits from the VET system. Therefore industry and employers need to assume responsibility to assist workers develop the skills they receive the benefits from. This could mean financing training, providing time for training or working on committees to identify the necessary skills.
19. The students who use the VET system need to be protected. Measures need to be implemented to ensure students receive the training they have signed up for and this training matches the job opportunities they are seeking. They also need to be assured that any certificates they have worked hard for will be recognised and won't be rescinded at a later date.
20. Workers in VET need to have their workplace conditions improved and protected. Many of the employees in VET are employed on a casual basis and on minimum conditions. A combination of privatisation and poor workplace conditions means that teachers, trainers and tutors working in VET, despite their status as educational professionals, are vulnerable to exploitation by unethical employers.

21. Casual teachers, trainers and tutors in VET are paid on the basis of their contact hours. This doesn't take fully into account lesson preparation, marking, assessment, reporting, class administration, staff meetings and professional development. These tasks are expected to be completed in the worker's own time. These workers need to be compensated adequately to include these activities. Reports to the union show many of these casual workers need to work two or more jobs to earn a living wage without any long-term security.
22. Further to this, in recent times there has been moves to introduce teacher professional standards into the sector e.g. Queensland College of Teachers Professional Standards for Vocational Education Practitioners. This is totally incompatible with the reality of teachers working in the sector who are rolled from one short-term contract to the next, not paid for non-contact hours and not fully treated as professionals.
23. In summary, the IEUA welcomes this review of VET. The Australian community has expressed deep concerns over the fate of VET in recent years particularly in the demise of the once highly regarded TAFE system and the rise in reliance on for-profit providers that has led to some unprincipled behaviour by a group of unethical companies. It is hoped that this review will be the beginning of a genuine attempt to fix the issues that have arisen in the sector. The IEUA sees a publicly funded TAFE system as key to rebuilding VET's reputation in Australia's overall education system in providing the knowledge and skills for workers as they move into the workforce. It is also extremely important the rights of students and workers in the sector be protected so stability is restored and quality is given a chance to prosper.
24. The IEUA would welcome the opportunity to speak further about this submission if so desired.



Chris Watt  
Federal Secretary

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