Healthy Business Training Academy

Good morning,

I am sure you have had a great many submissions from the VET sector so I will address only two segments that I consider vital to making the AQF more amenable to use in the sector.

1. Language and style.   As a long time VET educator and instructional designer I teach many others how to align their learning materials and assessments to the AQF levels of the qualifications.

   My primary feedback on this is that the majority of the people I train find it useful but difficult, because the language comes primarily from an academic and not a VET perspective.   I would respectfully request that consideration be given to a VET user guide in the manner of the User Guide for the Standards for RTOs. This would be very valuable.   I am currently writing such a guide because not enough attention to AQF is given in design and development of assessment tools.

2. The second comment is around Volume of Learning, which was included in the AQF Handbook as a recommendation but which ASQA has taken to mean an inflexible 'set in stone' mandatory requirement. They are going to impossible lengths to define to the nth degree how course providers will meet these, even if such durations are not warranted and not required by industry. It took me over a year of challenging them because they excluded assessment from the Volume of Learning, even though it was included in the AQF guidelines and even in ASQA's own guidelines.

   Volume of learning is a misnomer. **It is not a measure of learning achieved but of course duration.** There is no inbuilt means of assessing the variance between skills at entry and at exit nor is this mandated by AQF. It is an arbitrary measure decided upon academic (i.e. bums on seats) parameters.

   It does not take into account that VET is rarely taught in a classroom but over a great many modes:
   - in industry
   - through flexible and online learning
   - through mentoring programs
   - by MOOGs and social learning
   - through combinations of RPL and gap training
   - in skill sets or by end-user choice of just those units required for a particular workplace requirement.

   All of these have a significant impact on course duration.

   The Volume of Learning therefore does not gel with the VET system because we are long past time served, graded assessment and traditional delivery methods and are about individual performance against standards. The most appropriate analogy is with athletes and sportspeople who align with performance standards and personal bests (what industry wants and needs).

There are too many variances to decide competence based on time frames. We are seeing people graduate from programs with a one year volume of learning within three to six months because they have a foundation of vocational skills to build on. As providers we are now called upon by ASQA to justify each and every case why the candidate did not require the 'benchmark' volume of learning.

This also defeats the primary principles of vocational training:
- train only in the skills they need
- train only what is relevant to their industry sector
- certify people as competent when they meet the standards, not based on an artificial time constraint.

Volume of Learning as written in the AQF therefore works to disadvantage industry.

To give this a historical perspective: when I was a curriculum manager in TAFE, we put forward course accreditations for Certificate IV courses that were of 5 weeks of durations, because the Certificate IV generally built upon other vocational skills. Now we are finding we must reach the 'mandated' six month 'volume of learning' to deliver essentially the same skills and with no appreciable benefits to industry.

I respectfully recommend that there is a wide representation of experienced VET practitioners in the review. VET is the 'third rail' of tertiary education because that is where all the 'power' is. I am willing to respond in more detail at any time if required.

Amy Boleszny
B.A; A.L.A (UK), Graduate Dip. Ed., TAE50116; TAE50216.   Vet Educator and Instructional Designed since 1974.

CEO
Healthy Business Training Academy RTO: 30831
0407 292 661
PO Box 217, Helensvale, QLD 4212