



SUBMISSION

Australian Qualifications Framework Review

15 March 2019

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2. About Us

The Motor Trade Association of South Australia is the only employer organisation representing the interests of automotive retail, service and repair businesses in the state.

The MTA Training and Employment Centre comprises of both our Registered Training and Group Training Organisations. It is the automotive industry's training provider of choice and is the largest employer of automotive apprentices in South Australia.



We currently have
over **800** apprentices
in training

We also directly employ
500 apprentices
through **240** host businesses

DIVISIONS



3. Executive Summary

The MTA is supportive of both having a national qualification framework as well as its timely review.

The Australian Qualifications Framework (AQF) provides definition both to the qualifications issued by training providers as well as the underpinning knowledge and skills required for their attainment.

We believe there is significant scope to modernise the AQF by incorporating the guidance on the rationale being having a trade qualification and training system by identify its purpose as securing employment as well as setting related targets for commencement, completion and conversion to employment.

This will facilitate greater alignment of resourcing and effort towards truly national objectives, rather than the heavily modified and often parochial differences in objectives, funding and standards which currently characterise trade qualifications.

The MTA supports the extension of the AQF to accommodate more qualifications. This is particularly relevant in regards to short courses, which should be mapped to established AQF levels and, where possible, to qualifications.

We have identified through extensive industry engagement and consultation, the need for a greater emphasis on industry collaboration in regards to the development and currency of training packages to ensure they remain relevant to the modern automotive industry.

In addition, while generally supportive of the suggested approaches that can be adopted by the AQF, we wish to review the detail of proposed changes once they are available. The MTA is not convinced at this point in time that time and experience can be substituted to enable fast tracked qualification outside of the Recognition of Prior Learning process, and accordingly is not supportive of concepts such as accelerated apprenticeships.

However, where new skills sets such as enterprise and social learning can be attained through the primary and secondary school systems, we are supportive of recognition of these in off the job training requirements in an appropriate form.

The MTA looks forward to continuing to contribute to the discussion around the future direction and form of the Australia's trade qualification and training system.

4. Scope of consultation

AQF Suitability

The concept of a national qualification framework is highly desirable as a necessary baseline for the development of vocation education and training packages and in delivering consistency across a multitude of providers and jurisdictions.

However, the MTA considers that the AQF does have some limitations, are described in the consultation paper. These include:

- The need to ensure that the framework reflects the future needs of industry as greater demands are placed on trade qualifications to support economic activity
- Current trade qualification and industry expectations of what that qualification enables a qualification holder to do are being placed under extraordinary strain by changes to technology, demographic shifts, and globalisation, which are affecting industry work patterns and productivity
- Technology is enhancing the method of learning but there is no substitute for time and experience. A balanced approach is needed to ensure that fast-tracked learning does not throw the baby out with the bathwater.

Suggested Reforms to the AQF

Extension of the AQF

The MTA would support in principle the extension of the AQF to a wider range of qualifications to ensure the consistent application of standards across a broader range of skills sets.

In doing this, the MTA believes that alteration to the scope of the AQF must be guided by a methodology that is consistent applied to all possible additional qualifications.

Short Course Mapping

The MTA considers that short course and upskilling content should be required to be mapped to existing levels and where possible, to qualifications within the AQF. This will assist in ensuring consistency and quality in the awarding of qualifications.

Enterprise and Social Skills

The MTA has been a long standing advocate for the enhanced focus upon enterprise and social skills, particularly in the context of placing employment at the centre of the trade qualification and training system.

In this context, we support the a lifelong learning approach that enables facilitates the changing needs of industry and the refreshment of 'soft skills' which are becoming increasingly important to modern workplace.

We believe that this process cannot begin soon enough, and support enterprise skills such as creativity, critical thinking, emotional intelligence and associated disciplines being introduced in the primary and secondary school system. Where a student has been the recipient of such education, this should be recognised within the AQF through accommodation in the number of training hours required in their apprenticeship.

Implementation Issues

National management for a national system

There are three types of trade qualification and training providers - public, private and industry based, operating simultaneously under State and Federal regulatory and funding arrangements.

In effect, Australia has 8 systems operating a supposedly national program.

The objectives of these systems vary greatly, in response to a variety of factors which include:

- Local labour market needs
- Regulatory and funding structures
- Political considerations
- Geography

The MTA considers that there needs to be national benchmarks instituted in order to align priorities across jurisdictions and providing a unity of purpose to the system.

National Performance Indicators

The MTA has consistently advocated for the trade qualification and training system to have securing employment for its participants as its primary objective. This objective and the supporting mechanisms could and should appropriately reside within the AQF.

To facilitate this objective and the needs of industry for a steady pipeline of new entrants, there needs to be national benchmarks instituted in order to align priorities across jurisdictions which provide a unity of purpose

New short term Key Performance Indicators should be implemented, acting as a baseline, to counter the recent decline in apprenticeship commencements and completions. There must also be new reporting measures to track the movement of VET participants into employment. This should be adjusted to include growth upon attainment.

The MTA suggests the following benchmarks as short terms targets:

- Returning trade apprenticeship commencements to 2013 levels (99,000 nationally vs 72,000 in 2017)
- Returning trade apprenticeship completions to 2014 levels (63,000 nationally vs 41,000 in 2017)
- Increasing apprentices in training to 2013 levels (204,000 in training as at 31 December 2013 vs 163,000 as at 31 December 2017)
- 75% of participants in Certificate One and Two courses have attained employment in a trade qualification related industry within 12 months of completion

Training Package Currency

The automotive industry is facing an unprecedented period of technological disruption that requires fundamental change to how we prepare new entrants for a career within it.

The MTA has worked closely with PwC, the Skills Service Organisation for the automotive sector Industry Reference Committee, which develops the training packages delivered by RTOs.

We recently held an industry consultation with PwC on the development of the next generation of training packages for the automotive industry.

A key learning from this process was the need for greater industry involvement in the development of these training packages, as the current and proposed curriculum was nor reflective of the technology and methods currently used in industry.

The MTA has also found that there are significant inefficiencies associated with the development of training packages by third parties who have no direct involvement or history in the industry.

5. Possible AQF Approaches

Suggested Approach 1

- Include shorter form credentials in the AQF.
- Use the existing criteria for adding a qualification type to the AQF, possibly adapted for shorter form study, to determine whether shorter form credential types should be added to the AQF.
- Align shorter form credential types to AQF levels by assigning them across a number of Applicable AQF levels.
- Determine what groupings of shorter form credentials are required, and create them as credential types in the AQF.
- To help to aggregate shorter form credentials into qualifications, create a shorter form credential type that is defined by its link to a qualification type.

MTA Position

The MTA supports in principle this approach provided essential skills and experience accumulated through on and off the job training are not compromised.

Suggested Approach 2

- Specify that social and enterprise skills in AQF qualifications should be able to be:
 - taught in the context of the qualification's core content
 - acquired through the process of teaching and learning
 - assessed and reported in ways that are fair, valid and reliable.
 - Expand the list of enterprise and social skills included in the AQF and provide guidance or advice about delivering them through various qualifications (but do not include these skills as a taxonomy).

MTA Position

The MTA supports in principle this approach but suggests that learning for social and enterprise skills be incorporated into primary and secondary school curriculum

Suggested Approach 3

- Use AQF levels only to describe knowledge and skills and their application, and provide a description of each qualification type that is linked to levels.

MTA Position

The MTA recommends a broader context for the AQF in target setting. Levels do not apply to AUR and related training packages.

Suggested Approach 4

- Review the application of knowledge and skills domain of the AQF taxonomy and how it should be applied across the AQF levels.

MTA Position

The MTA supports this in principle.

Suggested Approach 5

- Revise descriptors to simplify them and ensure clear distinctions between levels.

MTA Position

Levels do not apply to AUR and related training packages.

Suggested Approach 6

- Revise the SSCE descriptor to recognise that the knowledge and skills acquired in the SSCE can be at a broad range of AQF levels and result in multiple pathways.

MTA Position

The MTA supports this in principle.

Suggested Approach 7

- To continue to provide guidance on the breadth and depth of a qualification, change the volume of learning unit of measurement from years to hours.
- To provide a common baseline for volume of learning, base the number of hours for a qualification type on the needs of a new learner.
- To help facilitate pathways between levels and qualifications, develop an hours-based credit point system in the AQF that may be voluntarily referenced by providers.
- To provide a common baseline for credit points, base the number of points for a qualification type on the needs of a new learner.

MTA Position

The MTA requires qualification as to how this can be aligned with the needs of industry for time and experience to be delivered through both on and off the job training in order to increase overall skill levels rather than simply complete the curriculum.

6. Next Steps

The MTA is available to provide further information in relation to this submission and to clarify any aspect of it.

This includes meeting with agency representatives and facilitating further consultations with industry on proposed changes.

7. Submission Contact

For further information relating to this submission please contact:

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