

26 May 2022

PwC's Skills for Australia
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Via email only: info@skillsforaustralia.com

Dear PwC's Skills for Australia

TDA submission to the TAE Training and Education Training Package Review

TAFE Directors Australia (TDA) is the peak national body which represents Australia's national network of publicly owned Technical and Further Education (TAFE) institutes and university TAFE divisions.

TDA is pleased to make this submission as part of the public review of the version 1 draft revised material relating to the TAE Training and Education Training Package product.

TDA has consulted with its members on this submission and acknowledges that many individual TDA members will submit their own, more detailed responses. Our views are intended to represent the broad sentiment of the national TAFE network which can be summarised as follows:

1. TDA and its members are broadly supportive of the proposed structure, including groupings and electives.
 - We are pleased that the Diploma now offers better career pathways for managers
 - We are pleased that the *TAEASS502 Design and develop assessment tools* is now an elective
 - TDA members would like to see the content related to 'assessment moderation' moved to the *TAEASS402 Assess competence unit*, rather than in a unit related to validation
2. While as TAFEs we believe that the online competencies are critical, we are not supportive of training packages generally being too prescriptive, so we suggest they are left as electives. TAFEs train online, and if new recruits come without those competencies, they will be provided professional development. The training package itself should provide optimal opportunities for flexible use by providers.
3. The absence of developing capabilities in RPL assessment needs further discussion. TDA members believe that RPL is an important assessment method and therefore warrants inclusion. However, we do acknowledge that RPL assessment, as a requirement of the training package, can be an obstacle to recruitment of industry experts. RPL assessment is generally done by experienced practitioners.

4. The treatment of foundation skills still needs to be worked through.
5. Some of the terminology is unclear. TDA members encourage the use of clear and consistent language throughout the training package material e.g. the use of 'plan' when 'learning program' would be clearer.

In regards the Diploma, TDA is supportive of its direction. This training product has now pathways for non-educators and opportunities to be used within TAFEs for career planning.

For detailed comments please refer to the submissions being made by individual TAFEs. We encourage Skills for Australia to ensure appropriate weighting is given to these perspectives as TAFEs both use these qualifications and train other RTO workforces in these qualifications.

In conclusion, TDA understands that this review was not scoped to delve fully into matters of the VET workforce and thus CEOs of TAFEs were not consulted. The TAE qualification is both a strength and an obstacle to workforce recruitment. It is a strength in that it encourages professionalisation of the workforce. However, it is an obstacle to agile recruitment of industry teachers, especially those being employed for their expertise in a specific field and likely to remain working within their industry with a light touch into vocational education. Our comments above on RPL assessment demonstrate this tension.

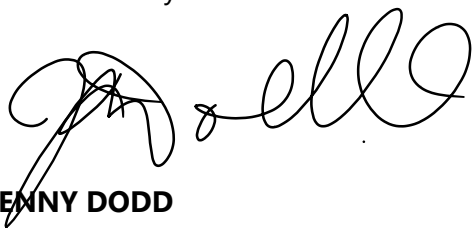
This poses an issue for the RTO standards review. Sustaining the TAE as a requirement for all members of the VET workforce is counterproductive to an agile response to industry. More must be done to allow ease of movement between industry and education, while ensuring appropriate standards protect student outcomes appropriately. TDA requests that this feedback is provided to the Department of Education Skills and Employment (DESE).

In the light of these comments, workforce issues must be considered more fully in 2023. TDA looks forward to working with DESE and the new Industry Cluster to achieve the responsiveness we need to industry with potential new qualifications. This is particularly important in areas of new or short supply skill areas, such as training for clean energy.

We appreciate the opportunity provided to TDA and our members to contribute to this review and thank Skills for Australia for the work to date. We look forward to engaging with you further to ensure that the revised qualifications are fit for purpose and provide the VET workforce with the skills and flexibility that they need to deliver quality outcomes for students and are also agile enough to attract industry experts to the workforce.

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Yours sincerely



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