

VET delivered to secondary school students scoping study



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Acronyms

ACACA – Australasian Curriculum, Assessment and Certification Authorities

ACTSSC – ACT Senior Secondary Certificate

AITSL – The Australian Institute for Teaching and School Leadership

ASbAs – Australian School-based Apprenticeships

AQF – Australian Qualifications Framework

ASQA – Australian Skills Quality Authority

COAG – Council of Australian Governments

DESE – Department of Education, Skills and Employment

HSC – Higher School Certificate

HSC NSW – Higher School Certificate (New South Wales)

NCVER – National Centre for Vocational Education Research

NESA – New South Wales Education Standards Authority

NRT – Nationally recognised training

NTCET – Northern Territory Certificate of Education and Training

QCAA – Queensland Curriculum and Assessment Authority

QCE – Queensland Certificate of Education

RTO – registered training organisation

SbATs – School-based Apprenticeships and Traineeships

SACE – South Australian Certificate of Education

SSCE – Secondary School Certificate of Education

TAC-WA – Training and Accreditation Council Western Australia

TCE – Tasmanian Certificate of Education

VCAL – Victorian Certificate of Applied Learning

VCE – Victorian Certificate of Education

VET – Vocational education and training

VETDSSS – Vocational Education and Training delivered to secondary school students

VETiS – VET in Schools

VRQA – Victorian Registration and Qualifications Authority

WACE – Western Australian Certificate of Education

Glossary

Australian School-based Apprenticeships (ASbAs) – allow secondary school students, generally in Years 10, 11 or 12, to work for an employer and train towards a recognised qualification, while completing their Senior Secondary Certificate of Education. Also known as School-based Apprenticeships and Traineeships (SbATs).

Australian Qualifications Framework (AQF) – the framework for regulated qualifications in the Australian education and training system, as agreed by the Commonwealth, State and Territory Ministerial Council with responsibility for higher education.

An important purpose of the AQF is to distinguish between the diverse range of qualifications in the 3 sectors: schools, VET and higher education. It incorporates the qualifications from each education and training sector into a single comprehensive national qualifications framework.

Australian Qualifications Framework (AQF) qualification – an AQF qualification type endorsed in a training package or accredited in a VET accredited course.

Clustering – a term with different meanings, depending on the VETDSSS context, to describe a group of schools working together to deliver VET under the oversight of one or more schools within the group that are registered providers, or to pool resources in contracting an external provider to deliver VET on a fee-for-service basis to create a larger group of students.

Clustering supports the viability of vocational education and training delivered to secondary school students (VETDSSS) where there are small student cohorts. It can also provide efficiencies by consolidating resources to secure a provider to deliver training that can be accessed by a number of schools.

Curriculum authorities – in Australia, each state and territory has separate legislation that defines the responsibility of an ACACA agency, often known as a Curriculum and Assessment Authority or a Board of Studies, to award a Senior Secondary Certificate of Education to students who fulfil its requirements.

Education Council – the Education Council is an arm of the Council of Australian Governments that brings together states and territories at a ministerial level to promote a cooperative approach to education policy.

Environmental scanning – ASQA undertakes a regular environmental scanning process to inform its identification of systemic risk. This process draws on a range of sources including stakeholder consultations, print and social media, government and industry reviews, ASQA regulatory data, intelligence from internal and external sources, and other external data. This process helps inform the focus of ASQA's regulatory strategies.

Heads of Agreement for Skills Reform – an agreement between the state and territory governments and the Australian Government that sets out reforms to improve the VET sector, and an approach and priorities for developing a new National Skills Agreement to replace the National Agreement on Skills and Workforce Development. It was signed by all states and territories in 2020.

National Register – once a VET course is accredited, it is listed on the National Register at training.gov.au.

National Vocational Education and Training Regulator Act 2011 (Cth) – the instrumental piece of legislation establishing ASQA on 1 July 2011.

Provider – the term 'provider' is used throughout the report to refer to all types of registered VET providers. In some instances, the term 'registered VET provider' is used for clarity. Where the term provider is used, this refers to all registered VET providers.

Registered training organisation (RTO) – a training organisation listed on the National Register, training.gov.au, as a registered training organisation. Also known as a provider.

Regulatory strategies – ASQA’s regulatory strategies outline regulatory priorities for a 2-year period and are renewed each year. The priorities focus ASQA’s regulatory effort on addressing the most important risks to Australia’s VET sector. Risks are identified using an evidence-based approach drawing on ASQA’s regulatory data, environmental scanning, and engagement with state and territory governments, as well as a range of stakeholder groups.

School-RTO – a registered VET provider that is also registered as a school in an Australian state or territory.

Senior Secondary Certificate of Education (SSCE) – each state and territory issues an SSCE to signify a student’s completion of senior secondary education. It is known in each state and territory by a different name: in the Australian Capital Territory (ACT), the ACT Senior Secondary Certificate (ACTSSC); in New South Wales, the NSW Higher School Certificate (HSC); in the Northern Territory, the Northern Territory Certificate of Education and Training (NTCET); in Queensland, the Queensland Certificate of Education (QCE); in South Australia, the South Australian Certificate of Education (SACE); in Tasmania, the Tasmanian Certificate of Education (TCE); in Victoria, the Victorian Certificate of Education (VCE) and the Victorian Certificate of Applied Learning (VCAL) (which will begin to be phased out commencing in 2023); in Western Australia, the Western Australian Certificate of Education (WACE).

Standards for Registered Training Organisations (RTOs) 2015 – the Standards set out the requirements that an organisation must meet in order to be a registered VET provider. The Standards ensure training products delivered by registered providers meet all the requirements of training packages or VET accredited courses, and have integrity for employment and further study. The *Standards for RTOs 2015* also ensure registered providers operate ethically with due consideration of learners’ and enterprises’ needs. There are 8 Standards. Each Standard has a set of clauses.

Standards for VET Accredited Courses – ASQA regulates accredited VET courses under these Standards. Accreditation means the course is nationally recognised, and that a registered provider can issue a nationally recognised VET qualification or VET statement of attainment following full or partial completion.

Standards of concern – ASQA identifies standards of concern, which are clauses in the *Standards for RTOs 2015* most likely to be associated with non-compliance. ASQA analyses how many finalised Performance Assessments (audits) have included non-compliance with a particular clause, and how frequently breaches against the clause are alleged in complaints to ASQA.

Third party – any party that provides services on behalf of a registered provider, but does not include a contract of employment between a registered provider and its employee. Also referred to as auspicing, to reflect that the third party is providing services under the auspices of the registered provider.

Training package – each training package contains 3 components: units of competency, which define the skills and knowledge needed and how to apply them in a workplace context; a qualifications framework, which contains groups of units of competency used to develop learning outcomes and range from Certificate I to Graduate Diploma level; and assessment guidelines, which cover the qualifications required by assessors, the design of assessment processes and guidelines for assessment management.

Training product – an AQF qualification, skill set, unit of competency, accredited short course and module.

VET – ASQA uses the term VET to refer to formal units of competency or qualifications, including apprenticeships and traineeships. These activities are subject to ASQA’s national regulatory framework.

VET accredited course – a course accredited by the VET regulator (ASQA), the Victorian Regulations and Qualifications Authority or Training Accreditation Council Western Australia, in accordance with the Standards for VET Accredited Courses. Or, if ASQA has delegated to a body a function of accrediting a course – the course accredited by the body under delegation.

These courses are developed to address niche and/or new and emerging areas where no suitable training package qualification exists. VET accredited courses are developed by course developers, often registered providers or private organisations with a particular interest and expertise in specific industry areas.

VET course – the units of competency in a training package endorsed by the Ministerial Council; or modules of a VET accredited course; or modules of a course accredited by the state-based VET Regulator in Victoria or Western Australia.

VET delivered to secondary school students (VETDSSS) – refers to VET that is consistent with the VET Quality Framework and undertaken by secondary school students while enrolled at secondary school, and for which students can gain credit towards their Senior Secondary Certificate of Education. It is also known as VETiS, but VETDSSS is the term used by ASQA.

VET Quality Framework – the aim of the VET Quality Framework is to achieve greater national consistency in registering and monitoring VET providers, and in the enforcement of standards in the VET sector. It is composed of the *Standards for Registered Training Organisations (RTOs) 2015*, the Australian Qualifications Framework, the Fit and Proper Person Requirements, the Financial Viability Risk Assessment Requirements and the Data Provision Requirements.

Executive summary

The Australian Skills Quality Authority (ASQA) is the national regulator for vocational education and training (VET) and supports the delivery of quality VET by ensuring consistency with the nationally approved *Standards for Registered Training Organisations (RTOs) 2015*. Our strategic objective is to achieve this through our regulation and partnership with others, so that students, employers, the community and governments have confidence in the integrity of national qualifications issued by training providers.

Strengthening VET pathways for secondary school students and improving the quality and vocational relevance of VET in schools is identified as one of the priorities in the Heads of Agreement for Skills Reform ([Commonwealth of Australia 2020](#), p. 2).

Effective integrated treatment of risk is critical to the successful delivery of ASQA's strategic objective. We have undertaken this review, *VET delivered to secondary school students scoping study*, to analyse issues and risks associated with VET delivered to secondary school students (VETDSSS), and to identify the nature of our regulatory response. We have undertaken this scoping study in collaboration with a broad range of stakeholders.

The findings of the scoping study do not indicate a higher prevalence of non-compliance among VETDSSS providers compared to the VET sector in general.

The review examined and provided valuable insights into a range of risks relating to assessment certification; amount of training; vocational competency and industry currency; student information, protection and support; oversight of third parties; and national consistency of regulation. Examination of these issues and their contexts will inform ASQA's regulatory approach and support quality outcomes through a range of identified action areas.

In the scoping study, ASQA commits to the following actions designed to support continuous improvement in the quality of VETDSSS:

1. ASQA enhance its information and guidance for providers, including school-RTOs, delivering VET to school students to help them better understand their compliance obligations and to support providers to self-assure and continuously improve.
2. ASQA continue to work with our partners in VET regulation to identify shared risk, regulate VETDSSS consistently with other VET, and support national consistency in the quality of VETDSSS.
3. ASQA enhance its engagement with education departments and schooling sectors to support improved awareness of VET regulatory requirements and their importance in achieving high-quality outcomes for VETDSSS.
4. ASQA continue to enhance its engagement with states and territories in relation to areas of shared strategic risk, supported by ASQA's ongoing routine monitoring of VETDSSS providers to promote continuous improvement and support public confidence in VETDSSS.
5. In undertaking ongoing routine monitoring of VETDSSS providers, ASQA will include clause 1.6 of the *Standards for RTOs 2015* in all Performance Assessments (audits) of providers concerning VET delivered to secondary school students.¹

Supporting VET reforms, the review also recommends that in developing the new National Skills Agreement, the Australian, state and territory governments consider how the observations made in this scoping study can contribute to improving the quality and continuous improvement of VETDSSS.

ASQA will share information with stakeholders and engage to support an understanding of the key findings, and raise awareness and insights into risks. Consistent with ASQA's Regulatory Operating Model, these actions will involve actively engaging with stakeholders and the regulated community to work collaboratively to enhance quality VET delivered in schools, co-design information and tools to support continuous improvement, provide clear feedback and support for providers to self-assure, and clearly communicate our regulatory expectations.

¹ From 6 April 2021, an ASQA audit is conducted as a Performance Assessment.

1. Overview

VETDSSS is VET undertaken by senior secondary students while they are enrolled at school, and that contributes to their Senior Secondary Certificate of Education (SSCE).

Nationally, the number and proportion of students undertaking VET while enrolled in secondary school has increased over recent decades. In 2019, more than 235,800 Australian secondary school students participated in VET that contributed to their SSCE (NCVER 2020a) and was delivered by over 1,100 VET providers (NCVER VOCSTATS 2020).

VETDSSS has, however, been subject to perceptions of poor and inconsistent quality. These concerns have been expressed in a number of research reports and reviews over the past 30 years. This is despite the Australian Government, state and territory governments and non-government schooling sectors implementing a variety of strategies to enhance the quality of VETDSSS.

ASQA is responsible for ensuring that VET delivered to school students, as part of their secondary schooling, is consistent with the VET Quality Framework. This responsibility is shared with state-based regulators, the Victorian Registration and Qualifications Authority (VRQA) and the Training and Accreditation Council Western Australia (TAC-WA), where training is delivered by providers operating solely in those states. In Queensland, under a delegation provided by ASQA, the Queensland Curriculum and Assessment Authority (QCAA) contributes to the regulation of VET delivered by school-RTOs up to a Certificate IV level (Australian Qualifications Framework (AQF) level 4).

Where VET is delivered to school students, there is a division of oversight, responsibility and authority with state and territory governments as the regulators of secondary schooling throughout Australia. This creates particular circumstances for the regulatory task of ensuring VETDSSS is delivered at a level consistent with the VET Quality Framework adopted by the Commonwealth, states and territories.

ASQA's purpose is to ensure quality VET, so that students, employers, governments and the community can have confidence in the integrity of national qualifications issued by training providers.

1.1 Background to the scoping study

In 2019, ASQA identified VETDSSS as a systemic risk to the quality and reputation of VET.

In the period since 2016–17, VETDSSS had been consistently raised by stakeholders as a concern in relation to the quality of VET in ASQA's environmental scanning. Between 2017 and 2020, ASQA identified that regulatory action was required to address poor quality in VETDSSS arising from the practices of a small number of providers delivering VET to large numbers of secondary school students.

In response to the issues identified through this regulatory action and longstanding concerns related to VETDSSS, ASQA committed to undertake a scoping study to further understand the risks presented by VETDSSS. This commitment was announced in our Regulatory Strategy 2019–21 (ASQA 2019c) and reiterated in our Regulatory Strategy 2020–22 (ASQA 2020).

The aim of ASQA's scoping study of VETDSSS was to determine whether longstanding concerns about the quality and outcomes of VETDSSS require a regulatory response.

ASQA's scoping study has been undertaken in the context of broader reforms in the national VET and education sectors, along with state and territory action to address some of the risks and longstanding concerns with VETDSSS.

Both *Looking to the Future: Report of the Review of Senior Secondary Pathways into Work, Further Education and Training* (Education Council 2020) and *Strengthening Skills: Expert Review of Australia's Vocational Education and Training System* (Commonwealth of Australia 2019) identified concerns about the consistency and quality of VETDSSS.

'Strengthening VET pathways for secondary school students and improving the quality and vocational relevance of VET in schools,' is identified as one of the priorities in the *Heads of Agreement for Skills Reform* (Commonwealth of Australia 2020, p. 2).

1.2 Approach to the scoping study

ASQA has drawn on regulatory data, evidence, expertise, a sample of relevant, historical audit reports and our understanding of the varied arrangements for delivering VET to secondary school students in states and territories. These have informed our understanding of the risks to quality associated with VETDSSS.

To enhance our understanding of the potential risks to VETDSSS, ASQA consulted relevant state and territory government departments, non-government schooling sectors, curriculum authorities, employer and employee representatives, peak VET sector groups and other stakeholders.

These consultations included 9 roundtables with government and education sector stakeholders, one in each jurisdiction and one at the national level. A total of 72 participants from 44 agencies participated in these roundtable consultations. In addition, ASQA conducted interviews with representatives from 28 different stakeholder organisations. Appendix 6 lists the individual stakeholder organisations consulted.

1.3 The scoping study – what we found

The findings of ASQA's scoping study indicate no higher prevalence of non-compliance among VETDSSS providers, compared to the VET sector in general. Notwithstanding, we have identified a range of risk drivers that are unique in VETDSSS compared to VET in other settings. These factors contribute to the likelihood of these risks. They also contribute to stakeholder perceptions that VETDSSS delivers lower quality outcomes when compared to the VET sector in general.

The scoping study identified 5 common areas of non-compliance among VETDSSS providers. These include:

1. assessment and compliance
2. amount of training
3. ensuring students are properly informed, protected and supported
4. trainer and assessor vocational skills and industry currency
5. adequate oversight of third-party arrangements.

While these areas of non-compliance are also common in the broader VET sector, our review of stakeholder feedback and VETDSSS arrangements indicates that the design and delivery of VETDSSS programs can incentivise behaviours that increase the risk of specific non-compliances in the VETDSSS context. This can compromise the quality of some VETDSSS. Even when VETDSSS is done well, the characteristics of VETDSSS embedded in senior schooling programs can contribute to a perception that all VET undertaken by school students is of poor quality.

As in previous reviews of VETDSSS, stakeholders identified many examples of good practice in VETDSSS that result in positive outcomes for students and employers. It is noteworthy that, where schools have a track record of sustaining high-quality VET over a period of time, the success of the program is often attributed to the efforts of a particularly dedicated individual teacher/trainer, VET coordinator or school principal. This suggests the factors contributing to success are not institutionalised within the school sector to the extent required to ensure the quality of VETDSSS is consistent across schools and jurisdictions.

1.4 The scoping study – ASQA’s response

The scoping study identifies how ASQA can strengthen and enhance its regulation of VETDSSS. This is consistent with our regulatory approach, which is shifting to a broader focus on self-assurance, and that promotes and supports providers to strive for excellence in training outcomes and to continuously improve. These actions also contribute to our 4-year strategic deliverables (Figure 1).

Figure 1. ASQA’s 4-year strategic deliverables



Source: ASQA 2021

ASQA recognises state and territory education authorities have developed different approaches to supporting and implementing VETDSSS within their schooling systems that reflect local contexts. ASQA also acknowledges the steps taken over time by all jurisdictions to ensure all students have access to high-quality VETDSSS.

The actions and recommendation following identify how, through our regulation and partnership with stakeholders, ASQA can ensure quality VET so that students, employers, the community and governments have confidence in the integrity of national qualifications issued by training providers.

ASQA Action 1

ASQA enhance its information and guidance for providers, including school-RTOs, delivering VET to school students to help them better understand their compliance obligations and to support providers to self-assure and continuously improve.

ASQA Action 2

ASQA continue to work with our partners in VET regulation to identify shared risk, regulate VETDSSS consistently with other VET and support national consistency in the quality of VETDSSS.

ASQA Action 3

ASQA enhance its engagement with education departments and schooling sectors to support improved awareness of VET regulatory requirements and their importance in achieving high-quality outcomes for VETDSSS.

ASQA Action 4

ASQA continue to enhance its engagement with states and territories in relation to areas of shared strategic risk, supported by ASQA's ongoing routine monitoring of VETDSSS providers to promote continuous improvement and support public confidence in VETDSSS.

ASQA Action 5

In undertaking ongoing routine monitoring of VETDSSS providers, ASQA will include clause 1.6 of the *Standards for RTOs 2015* in all Performance Assessments (audits) of providers concerning VET delivered to secondary school students.

This is consistent with a greater focus on industry outcomes and will help inform the development of information and guidance for providers under Action 1.

1.5 Supporting VET reform

Further to the actions ASQA has identified it will take, there is the opportunity for considering this report in the broader context of skills reform.

Recommendation 1

In developing the National Skills Agreement, the Australian, state and territory governments consider how the observations made in this scoping study can contribute to improving the quality and continuous improvement of VETDSSS.

1.6 How to read this report

This report is structured in 8 parts. We first provide a background to the scoping study (section 2) followed by our understanding of VETDSSS (section 3). From this foundation, we outline our approach to the scoping study (section 4) including our analysis of ASQA's regulatory data (section 5) and findings from stakeholder consultation (section 6).

What the scoping study found (section 7) explains the basis of our findings. Section 8 outlines the actions ASQA commits to and provides one recommendation for our partners who share responsibility for supporting quality in the delivery of VET to secondary school students.

2. Scoping study context

This section outlines the broader contexts of the VET sector and within ASQA, that have influenced or been taken into consideration in ASQA's approach to the scoping study.

2.1 Addressing a systemic risk

ASQA first identified VETDSSS as a systemic risk to the quality and reputation of VET in 2019.

This was a result of:

- ongoing stakeholder concerns about the quality of VET for secondary school students:
 - in 2019, ASQA identified VETDSSS as one of the top concerns for stakeholders that presented a risk to the quality and reputation of VET
 - since 2016–17, ASQA stakeholders have consistently identified the quality of VETDSSS as a concern.
- issues identified during regulatory action taken against some providers delivering VET to large numbers of school students, primarily through third-party arrangements
 - between 2017 and 2020, ASQA took a range of regulatory action to address a varied nature and extent of non-compliances by VETDSSS providers.

Systemic risks are described in ASQA's Regulatory Risk Framework as risks that are likely to affect a significant proportion of providers in the VET sector, or that relate to a particular cohort of providers across the VET sector or a specific industry sector.

ASQA seeks to understand and respond to both systemic and provider risks. Provider risks are those that arise from the behaviour and practices of individual providers. The vast majority of VET providers comply with their regulatory obligations. However, the behaviour of some providers can present a risk to the quality and reputation of the VET sector. ASQA supports all providers to self-assure and continuously improve the quality of VET they deliver. As a risk-based regulator, ASQA also identifies and takes regulatory action against individual providers presenting a risk to quality.

Systemic risks, however, often require further investigation and focused research to understand the nature and extent of the risk in more detail, and to inform the development of an effective regulatory response. Systemic risks also require ASQA to work closely with its partners in VET regulation where the drivers of particular risks, or the levers to address them, require a coordinated response.

Where serious systemic risks are identified, ASQA may conduct a strategic review to further investigate. Addressing risks that affect a significant proportion, or a particular cohort of providers, can involve targeted education and guidance campaigns, monitoring of provider practices and targeted Performance Assessments (audits).

The scoping study took a more targeted approach to review whether concerns relating to the quality and outcomes of VETDSSS required deeper investigation to inform the nature of regulatory response required.

2.2 Aim of the scoping study

ASQA committed to undertaking the scoping study in our *Regulatory Strategy 2019–21* and reiterated this commitment in our *Regulatory Strategy 2020–22*.

The aim of the scoping study was to identify whether the longstanding concerns about VETDSSS require a regulatory response.

ASQA is committed to undertaking a scoping study, rather than a formal strategic review or other regulatory response to concerns about VETDSSS. This enabled ASQA to investigate concerns about the quality of VETDSSS, without undue disruption for students in their senior phase of schooling at the time. ASQA's approach was devised accordingly as an initial investigation.

Our commitment in the *Regulatory Strategy 2019–21* stated that ASQA would:

- further clarify the key risks associated with VET delivered in secondary schools, and understand how these risks interact with the delivery models in each jurisdiction
- research the delivery and quality assurance of VET for secondary school students in other countries
- analyse the findings of existing research and reviews
- provide further advice to all state and territory ministers with responsibilities for education and training, concerning the risks identified through recent audits of registered providers delivering VET in secondary schools
- consider whether a regulatory response and/or further work is required, including a potential strategic review into VET delivered in secondary schools (*Regulatory Strategy 2019–21*, p. 10).

2.3 The context of reform

Although the scoping study commenced in 2019, it has been undertaken in the context of several major reviews that have since commenced and that canvass issues related to VETDSSS, and reforms by national and state and territory governments. These include *Looking to the Future: Report of the Review of Senior Secondary Pathways into Work, Further Education and Training* (2020), known as the *Senior Secondary Pathways Review*, and the Joyce Review (*Commonwealth of Australia 2019*).

2.3.1 The Joyce Review (2019) and VETDSSS

The independent review of Australia's VET system concluded during the scoping study period. In his final report, *Strengthening Skills: Expert Review of Australia's Vocational Education and Training System*, (the Joyce Review), the Honourable Steven Joyce made several observations and recommendations in relation to the delivery of VET to school students.

The Joyce Review reiterated longstanding criticisms of VETDSSS, while recognising the commitment states and territories have made to supporting consistency in the delivery of VET to secondary school students:

To improve consistency, States and Territories have agreed to some common elements for VET delivered to secondary students. All VET that provides credit towards a senior certificate must be drawn from nationally recognised training packages or accredited courses, be delivered and/or assessed by RTOs that are compliant with the VET Quality Framework, and be assessed within a competency-based assessment framework by assessors who comply with VET standards (*Commonwealth of Australia 2019*, p. 93).

The Joyce Review also identified significant variations in the delivery of VETDSSS across jurisdictions. In particular, 'While the same national VET Quality Framework applies to all VET, the approach towards quality assurance varies in practice between States and Territories, and different approaches are taken towards overseeing regulation' (Commonwealth of Australia 2019, p. 93).

Two recommendations, in particular, concern ASQA's role in regulating the VET sector:

The Joyce Review, recommendation 7.4: VET in Schools programs to only deliver qualifications registered to the Australian Qualifications Framework that will be recognised as valid and robust by industry once the student graduates (Commonwealth of Australia 2019, p. 98).

The Joyce Review, recommendation 7.5: The Australian Skills Quality Authority and the two state regulators ensure their regulatory activity equally applies to all Registered Training Organisations delivering VET to secondary students (Commonwealth of Australia 2019, p. 98).

2.3.2 The Senior Secondary Pathways Review (2020) and VETDSSS

In 2020, a panel chaired by Professor Peter Shergold delivered a report to the Education Council on future pathways into work for Australian secondary school students. The report, *Looking to the Future: Report of the Review of Senior Secondary Pathways into Work, Further Education and Training (2020)* (The Pathways Review), was one of the policy initiatives under the National School Reform Agreement.

The Pathways Review noted that the Australian economy has a need both for graduates of higher education and the VET sector. It conveyed findings from stakeholders that, 'VETDSSS is of inconsistent quality, difficult to navigate, and not well integrated into senior secondary studies. VET qualifications delivered in schools need to meet clearly defined standards and deliver or contribute to credentials that are accepted in the labour market' (The Pathways Review 2020, p. 18).

The Pathways Review made 3 recommendations regarding VETDSSS:

Recommendation 8: Vocational education and training (VET) should only be provided at school where it can be done in a high-quality way as demonstrated through the explicit endorsement of local employers or industry bodies, and if schools are unable to meet these requirements, they should support their students to undertake VET at an external registered training organisation (The Pathways Review 2020, p. 89).

Recommendation 9: When undertaking a formal VET qualification or school-based apprenticeship or traineeship, the allocation of time spent by students at school, with a registered training organisation, or in the workplace should be based upon what is in their best interests, rather than upon funding arrangements or administrative convenience (The Pathways Review 2020, p. 89).

In collaboration with the Skills Council, Education Council should co-design with industry a national strategy on vocational education and training in schools that promotes the quality of VET (The Pathways Review 2020, p. 89).

2.3.3 National reform

The quality of VETDSSS is a priority in the national skills reform agenda. The Heads of Agreement for Skills Reform ([Commonwealth of Australia 2020](#)) signed by the Commonwealth, states and territories in August 2020, sets out immediate reforms to improve the VET sector, and an approach and priorities for developing a new National Skills Agreement to replace the National Agreement on Skills and Workforce Development.

'Strengthening VET pathways for secondary school students and improving the quality and vocational relevance of VET in schools,' is identified as one of the priorities in the Agreement ([Commonwealth of Australia 2020, p. 2](#)).

More broadly, the priorities in the agreement are aimed at ensuring the VET system is delivering for students and employers and equipping Australians with the skills they need for emerging jobs. The priorities also recognise that reforms to Australia's vocational education system must meet the needs of a post-COVID economy.

The Australian, state and territory governments have committed to work collaboratively on long-term improvements to the VET sector, including achieving the new National Skills Agreement by late 2021. This agreement will help to inform actions taken through the national skills reform process to improve the quality of VET delivered to school students.

2.3.4 ASQA reform

ASQA is also undertaking significant reforms. On 28 April 2020, the Australian Government released the *Rapid Review of the Australian Skills Quality Authority's Regulatory Practices and Processes* (mpconsulting 2020, known as *The Rapid Review*).

The Rapid Review found that, while ASQA's overarching vision and purpose remain appropriate, adjustments to our practices are needed to improve our engagement with the sector and ensure ASQA's regulatory approach is guided by necessity, risk and proportionality.

The Rapid Review includes 24 recommendations for reforms. A key focus of these reforms is moving from input and compliance controls to a stronger focus on excellence in training outcomes. These changes are supported by amendments to the *National Vocational Education and Training Regulator Act 2011* (Cth).

Further regulatory amendments will follow the quality reform measures agreed under the Heads of Agreement for Skills Reform ([Commonwealth of Australia 2020](#)), such as the revision of the *Standards for RTOs 2015*.

ASQA's reforms are part of a suite of changes taking place nationally. To date, these have included:

- the creation of a new portfolio agency, the Department of Education, Skills and Employment (DESE) on 1 February 2020
- the launch of a National Skills Commission in July 2020
- the establishment of a National Careers Institute on 1 July 2019
- the commencement of Pilot Skills Organisations in early 2020.

More information about the Skills Reform agenda and consultation is available on [DESE's website](#).

Alongside these national changes, a range of VET reforms are underway in most states and territories.

2.3.5 State and territory reform

State and territory skills and education departments and non-government schooling sectors have implemented numerous strategies to support the quality of VETDSSS. Measures taken have varied across jurisdictions. They include providing procurement advice and guidance on becoming a school-RTO and maintaining compliance with VET regulations. These measures have also included the establishment of preferred provider lists and prescriptions about the type of VET suitable for students in the senior phase of schooling.

In response to recent reviews conducted by states and territories, additional reforms are underway in a number of jurisdictions. These include:

- changes to provider eligibility requirements to deliver VET to secondary school students
- provision of further guidance and support for schools when partnering with providers
- looking at how VET contributes to achieving an SSCE, and promoting VET to students and parents/caregivers in the context of the senior curriculum
- opportunities for employment or further training and education.

3. What is VET delivered to secondary school students?

In this section, we define VETDSSS, describe those aspects of delivering VET to school students that are of interest to ASQA in the scoping study and revisit what are widely acknowledged as issues relating to the quality and outcomes of VETDSSS.

3.1 Defining VETDSSS

VETDSSS is VET undertaken by senior secondary students while they are enrolled at school that contributes to their SSCE. This report does not address VET undertaken by school-aged students separate to their school enrolment, such as VET undertaken in association with part-time employment, or through school without contributing to a SSCE.

We use the term 'VET delivered to secondary school students', or its abbreviated form 'VETDSSS', throughout this report as it emphasises that VET delivered in schools uses the same units of competency and qualifications that are delivered in any other VET setting.

VETDSSS is delivered, assessed and certified under the same set of conditions as VET undertaken by non-secondary students ([Education Council 2020](#)). This term has been chosen specifically to avoid the implication that VET undertaken by school students as part of their senior school curriculum is different to other VET.

States and territories have agreed to some common elements for VETDSSS, including that all VET credited within SSCEs is:

- drawn from nationally recognised training packages or accredited courses
- delivered and/or assessed by providers that are compliant with the VET Quality Framework or the Australian Quality Training Framework
- assessed within a competency-based assessment framework by assessors who comply with the VET Quality Framework and
- results in students being awarded nationally recognised VET qualifications and/or statements of attainment by the provider delivering and/or assessing the VET ([ACACA 2017](#), p. 9).

VET undertaken as part of an Australian School-based Apprenticeship (ASbA) is encompassed by the definition of VETDSSS, and aligns with the common elements of VETDSSS agreed by states and territories. Throughout this report, VET undertaken by school students as part of an ASbA (or SbAT) is considered VETDSSS. Although ASbAs are subject to individual employment contracts, involve employers or group training organisations and can involve different funding arrangements, registered providers have the same regulatory obligations to students. ASbAs also constitute only 7.3 per cent of school students undertaking VET that will contribute towards their SSCE ([NCVER, 2020a](#)).

We recognise that the term 'VET delivered to secondary school students', or 'VETDSSS', may not be applied nationally by other bodies. For example, the National Centre for Vocational Education Research (NCVER) currently uses the term 'VET in Schools' to describe 'VET undertaken by school students as part of their SSCE' ([NCVER 2020b](#)). The term VET for secondary school students (VfSSS) is also used in VET and education sectors.

The purpose and perceived outcomes of VET in senior secondary schools have been subject to different perspectives since its introduction (Zoellner 2020, p.1). This has highlighted the importance of clarifying this terminology, as outlined in a number of key reports. The Preparing Secondary Students for Work framework (2014) is one example. The framework was developed with education ministers from all states and territories and endorsed by the Education Council. The authors of this framework note:

The terms 'VET in Schools' and 'VETiS' have become catch-all terms for quite different programs and activities. This includes VET delivered to secondary students; school-based apprenticeships and traineeships; learning about work and employability skills; student support services such as career counselling; and exploratory activities such as try-a-trade and work experience.

The use of 'VET in Schools' to cover such a wide range of programs and activities has caused confusion about their purpose, led to different expectations of their outcomes and contributed to concerns about their quality (Education Council 2014, p. 6).

A recent paper by Dr Justin Brown (2019) from the Australian Council for Education Research provides a detailed introduction to international models that have, with varying success, integrated general and vocational education within their secondary education systems and structures. An ongoing challenge for upper-secondary schooling around the world is how to ensure there's enough flexibility in the curriculum to cater for post-secondary pathways that require different learning approaches. A 2015 report by the World Bank about secondary schooling in India found that:

In the countries studied... those which stream students are more focused on the first of these goals i.e. preparation for direct entry into the labour market immediately after graduation; while those countries which do not stream regard it as awareness-raising, aiding career choice and preparing students for intensified vocational education at a later stage. Decisions on curriculum design, teacher profile, employer engagement etc. are then all made according to which of these goals is compatible with government policy' (World Bank 2015, p. 2, cited in Brown 2019, p. 18).

ASQA recognises the value of explicit career education and work exploration activities that secondary students may undertake. Career education and work exploration might include short programs with industry, work placements and curriculum-based subjects to help secondary students explore the world of work, identify career options and pathways, and build career development skills. These activities provide opportunities for students to 'taste' the world of work through one-off events such as career expos, initiatives such as enterprise learning, or spending time in a real or simulated workplace (Education Council 2020 p. 77). While participation in VET may offer similar benefits, the delivery of VET must be consistent with the VET Quality Framework to retain the integrity of the VET system. ASQA does not regulate curriculum-based career education and work exploration activities, and they are not a focus of this report.

3.2 Delivering VETDSSS

3.2.1 National training within state and territory senior schooling

Senior secondary education is the responsibility of state and territory governments and non-schooling sectors. Curriculum authorities in each state and territory have different arrangements for integrating VET within their senior school curriculum and providing credit for VET towards SSCEs.

Likewise, education departments in each state and territory deliver VET programs to their students differently. These different approaches reflect the historical factors and particular policy settings within each jurisdiction. As a result, senior school students across Australia undertake VET with either:

- schools that are registered providers
- schools delivering VET on behalf of a registered provider under third-party arrangements
- an external provider; for example, a private provider, community provider, TAFE, enterprise registered provider or other type of registered provider (see section 3.3).

In each state and territory, the delivery model combines these approaches in different ways, depending on the VET providers available, the historical arrangements relating to the registration of schools as VET providers and the links between senior schooling and vocational training in general. In some states and territories, there is a perception of risk associated with certain approaches to delivery, and policies and procedures have been put in place to avoid or manage risks or promote preferred models.

States and territories have also put in place different policies and procedures to support the delivery of VET to school students. These have been developed in response to the specific arrangements for delivering education and supporting skills training and employment in each state and territory. The Joyce Review refers to the variation in approaches towards quality assurance between states and territories (Commonwealth of Australia 2019, p. 93).

We have not attempted to describe these models in detail in the scoping study, particularly because the arrangements in place in a number of states and territories were being reformed while the scoping study was underway.

For the purpose of the scoping study, ASQA focused on the following aspects of the delivery model in place in each state and territory:

- **How risks associated with VET providers are managed** – including permission for delivery by external providers or through third-party arrangements, development of preferred provider lists and assessments of provider quality and guidance on the selection of, or agreements with, external providers or providers overseeing delivery by schools as third parties.
- **Self-assurance of compliance with the Standards for RTOs 2015** – including confirmation or monitoring of compliance, guidance and advice on how to comply as a school or in a schooling context.
- **Assessment of appropriateness of qualifications for school students** – including lists of qualifications approved for secondary school students in general, or for individual students, and incorporation of VET competencies within the school curriculum or academic subjects or assessment.
- **Senior secondary certificates of education credit arrangements** – including minimum and maximum qualification levels, completion requirements, amount of credit permissible from VET and recognition of VET within the Australian Tertiary Admission Rank.

In addition to different delivery models, there are various authorities responsible for regulation in a number of states and territories. These include the Victorian Registration and Qualifications Authority (VRQA) and the Training and Accreditation Council Western Australia (TAC-WA). ASQA has delegated its regulatory powers to the Queensland Curriculum and Assessment Authority (QCAA) for VET delivered by school-RTOs in Queensland up to Certificate IV level. Like ASQA, TAC-WA regulates school-RTOs against the *Standards for RTOs 2015* with the same requirements in place as for all providers.

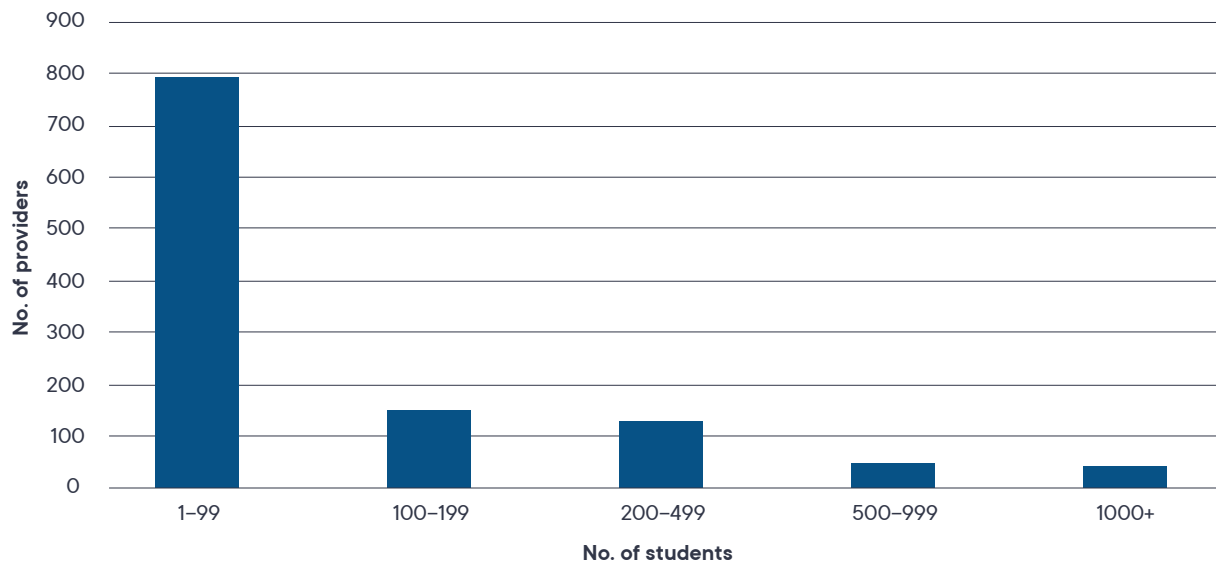
The variation in these arrangements for delivering VET to school students complicates the integration of a national training system within senior secondary education.

3.2.2 VETDSSS providers

In 2019, there were 1,169 providers of VET to secondary school students throughout Australia. This was a decrease from 1,324 providers in 2016 (NCVER VOCSTATS 2020, see Figure 2).

Of these providers, the majority were small with between one and 99 students. Forty-five providers had more than 1000 students.

Figure 2: Number of students per provider



Source: Based on NCVER VOCSTATS 2020

Of these 1,169 providers, 50 per cent (589) were private training providers and 21 per cent (240) were government schools (see Table 1).

The next largest groups of providers were community-based education providers (82 providers) and Catholic schools registered as VET providers (81), each representing 7 per cent of providers delivering VET to school students.

The number of private training providers has decreased since 2016, when there were 651 training providers. There has also been a reduction in the number of every other type of provider since 2016, with the exception of non-government, Catholic university providers (see Table 1).

Nationally, there is a concentration of students among the largest providers of VET for school students. These large providers deliver predominantly through schools as third-party providers, which reflects a reliance on this delivery model in particular states and territories.

For more detailed data on VETDSSS enrolments and providers, see Appendix 1.

Table 1: Types of VETDSSS providers

Provider type	2016		2017		2018		2019	
	No.	%	No.	%	No.	%	No.	%
Community-based adult education provider	94	7%	88	7%	89	7%	82	7%
Enterprise – Government	15	1%	15	1%	13	1%	13	1%
Enterprise – Non-government	20	2%	14	1%	16	1%	13	1%
Equipment and/or product manufacturer or supplier	1	0%	-	0%	-	0%	-	0%
Industry association	51	4%	42	3%	49	4%	43	4%
Other – not elsewhere classified	15	1%	15	1%	12	1%	9	1%

Provider type	2016		2017		2018		2019	
	No.	%	No.	%	No.	%	No.	%
Privately operated organisation	651	49%	626	50%	610	50%	589	50%
Professional association	6	0%	3	0%	2	0%	4	0%
School – Catholic	90	7%	84	7%	84	7%	81	7%
School – Government	264	20%	246	20%	242	20%	240	21%
School – Independent	66	5%	63	5%	61	5%	61	5%
TAFE	40	3%	40	3%	35	3%	24	2%
University – Government	10	1%	9	1%	8	1%	8	1%
University – Non-Government Catholic	1	0%	2	0%	2	0%	2	0%
Grand total	1,324	100%	1,247	100%	1,223	100%	1,169	100%

Source: Based on NCVER VOCSTATS 2020

3.3 Participation in VETDSSS

Over the past 2 decades, the number and proportion of students undertaking VET while enrolled in secondary school has increased significantly (NCVER 2020a). Prior to 2010, the minimum school leaving age in most states and territories was 15 or 16. Since that time, it became mandatory for all young people to participate in schooling until they complete Year 10, and to participate full time in education, training or employment, or a combination of these activities until the age of 17 (ACARA 2011). This has resulted in a more diverse senior student cohort in schools and is linked to an increase in VET offerings in secondary schools (Commonwealth of Australia 2019).

This rising student interest in VETDSSS stems from changing economic and employment conditions, as well as increases in the school leaving age. Also contributing to increasing student demand for VETDSSS is the introduction of senior certification arrangements that recognise VET programs as credit towards senior certificates and provide a pathway into further and higher education.

Nationally, the number and proportion of school students undertaking VET while completing secondary school has continued to increase (NCVER 2020a). Of the 485,446 young people enrolled in senior secondary in 2019 (ACARA 2020), there were:

- 235,800 'VET in Schools' students, including:
 - 17,100 school-based apprentices and trainees, representing 7.3 per cent of all VET in Schools students
 - 218,700 students undertaking 'Other VET in Schools programs' (VET subjects and courses that contribute to the SSCE), representing 92.7 per cent of all VET in Schools students (NCVER 2020a, p. 1).

Most VETDSSS students undertake training package qualifications at the Certificate II level, with Certificate III level qualifications being the second most popular (see Table 2).

Table 2: National VETDSSS enrolments by AQF level, 2019

Qualification level	Total enrolments (2019)	%
Certificate I	35,386	11%
Certificate II	196,542	61%
Certificate III	87,368	27%
Certificate IV	2,148	1%
Diploma	3,400	1%
Advanced Diploma	10	0%
Total	324,854	100%

Source: Based on NCVER VOCSTATS 2020

In 2019, 70 per cent of VETDSSS enrolments were in only 27 qualifications. The most popular 15 training package qualifications, accounting for just over half of all 2019 enrolments in VETDSSS (54.3 per cent, or 176 352 enrolments) are listed in Table 3.

See Appendix 1 for the most popular qualifications in each state and territory.

Table 3: Most popular training package qualifications in VETDSSS (by enrolment), 2019

Product code	Training package qualification	2019 Enrolments	%
SIT20316	Certificate II in Hospitality	23,079	7.1%
FSK20113	Certificate II in Skills for Work and Vocational Pathways	21,303	6.6%
BSB20115	Certificate II in Business	20,279	6.2%
SIT20416	Certificate II in Kitchen Operations	13,721	4.2%
SIS20115	Certificate II in Sport and Recreation	13,624	4.2%
CPC20211	Certificate II in Construction Pathways	12,166	3.7%
BSB30115	Certificate III in Business	12,018	3.7%
SIS30115	Certificate III in Sport and Recreation	10,251	3.2%
MEM20413	Certificate II in Engineering Pathways	9,869	3.0%
SIS30315	Certificate III in Fitness	8,485	2.6%
CPC10111	Certificate I in Construction	8,218	2.5%
AUR20716	Certificate II in Automotive Vocational Preparation	6,377	2.0%
ICT20115	Certificate II in Information, Digital Media and Technology	5,817	1.8%
SIR30216	Certificate III in Retail	5,743	1.8%
ICT10115	Certificate I in Information, Digital Media and Technology	5,402	1.7%

Source: Based on NCVER VOCSTATS 2020

3.4 History of concerns about VETDSSS

Since 1991, when all state and territory governments and the Australian Government committed to a national training system, concerns have been expressed in research reports and reviews about the quality and outcomes of VETDSSS.

These concerns have included:

- the suitability of programs for individual students and/or whether sufficient information was provided to inform student choice
- a shortage of appropriately qualified trainers and assessors
- the vocational competency and industry currency of trainers delivering VET to secondary school students
- a lack of access to industry-standard facilities for training and assessment
- the volume of learning and hours of training for school students
- inadequate work placement opportunities and experience
- a lack of understanding about competency-based assessment in the school environment
- students receiving qualifications without achieving the requisite competencies
- inadequate monitoring and oversight of third-party arrangements
- timely certification of students on completion of training
- risks of reputation to VET from poor-quality delivery and outcomes of VETDSSS.

These concerns have also been emphasised as recently as 2020, when the Senior Secondary Pathways Review noted that:

VET delivered to senior secondary students is of inconsistent quality, difficult to navigate, and not well integrated into senior secondary studies. VET qualifications delivered in schools need to meet clearly defined standards and deliver or contribute to credentials that are accepted in the labour market ([Education Council 2020](#), p. 76).

A series of provider closures in Western Australia in 2016 and 2017 affected significant numbers of students. The 2017 inquiry into VET delivered to secondary school students by the Parliament of Western Australia Education and Health Standing Committee identified several systemic issues. These included:

- the concentration of delivery in a few private providers
- lack of access to specialist facilities
- limited access to courses and work placements, especially in regional and remote schools
- the vocational competency and industry currency of teachers delivering VET qualifications, especially in regional and remote schools
- third-party arrangements ([Parliament of Western Australia 2017](#)).

Despite being the focus of attention for the Australian, state and territory governments to address challenges in the delivery of VETDSSS and questions about the quality and consistency of VETDSSS, many of these issues have persisted.

The aim of the scoping study was to identify whether these concerns and issues relating to VETDSSS require a regulatory response.

4. Approach to the scoping study

Each year, thousands of students graduating from secondary school rely on the attainment of VET units of competency to complete their senior SSCs and access employment, further training or higher education. ASQA appreciates this is an important component of the senior curriculum in each state and territory. In acknowledgement of this sensitivity in the delivery of VET to school students, ASQA committed to undertake a scoping study, rather than a strategic review. The scoping study was exploratory, with the aim of understanding whether the longstanding issues associated with VETDSSS required a regulatory response.

ASQA also acknowledges the steps taken over time by all jurisdictions to deliver quality VET to school students. We conducted targeted consultation with state and territory education departments, training authorities, non-government schooling sectors and state-based VET regulators to inform the scoping study, but did not undertake public consultation.

ASQA committed to undertake a scoping study to further understand the issues associated with VETDSSS, being cognisant of the sensitivity and complexity of delivering VETDSSS.

To inform our understanding of the issues raised by stakeholders about VETDSSS, the scoping study drew on:

- ASQA's regulatory data and regulatory intelligence
- stakeholder insights and feedback
- NCVET participation data available in the VET in Schools Collection
- other reviews and reports relating to VETDSSS
- information about state and territory delivery models.

5. Analysing regulatory data

ASQA drew on regulatory data, evidence and intelligence to inform our understanding of the risks to quality associated with VETDSS. Our regulatory data also informed our assessment of whether longstanding concerns about VETDSS are, in fact, regulatory issues.

We use regulatory data to identify systemic risk on a regular basis through environmental scanning and this study has drawn on these well-established methods to:

- inform our assessment of risk among VETDSS providers
- identify whether there are common areas of non-compliance among VETDSS providers
- compare risk among VETDSS providers with the VET sector in general.

To understand the extent and nature of risk among VETDSS providers, we:

- compared the prevalence of findings of serious and critical non-compliance among VETDSS providers with the VET sector in general
- identified clauses in the *Standards for RTOs 2015* that are of concern
- identified common areas of non-compliance in a sample of historical audit reports of VETDSS activity.

We also sought expert advice from our Quality Assessors who have in-depth experience in assessing the quality of delivery of VET by providers, when delivering VET to secondary school students.

The insights drawn from each of these analyses have informed our view about the extent and nature of risk in the delivery of VET to school students.

Our analysis is based on the data and evidence we hold about providers that deliver VET to school students. We drew on this because:

- systemic risk is a risk that relates to a particular cohort of providers
- we are able to identify VETDSS providers within our regulatory data but not VETDSS training activity.

The cohort of VETDSS providers was identified using NCVER's VET in Schools Collection. The most recent data available that could be used for this purpose during the scoping study was for the 2019 calendar year.

A description of the data qualifications and limitations relevant to the scoping study are described in Appendix 2.

5.1 Prevalence of non-compliance among VETDSS providers

5.1.1 Approach

ASQA compared the prevalence of serious and critical non-compliance for VETDSS providers with the VET sector in general. ASQA conducted this comparison for providers that were found to have serious and critical levels of non-compliance. At these more severe levels of non-compliance, it is more likely that the non-compliance is systemic within a provider's policies, practices and operations. At these levels of non-compliance, it is reasonable to assume that if a provider delivers VET to school students, a serious or critical non-compliance is more likely to affect their delivery of training to school students, even if the audit did not directly address this aspect of the provider's training.

We can only compare VETDSSS providers to all providers at a national level. While data is available for individual states and territories, comparison at this level is not supported because of the small number of audits conducted in some states and territories, and the variation in the number of audits between states and territories. The state or territory of a provider in ASQA's regulatory database reflects the location of the provider's head office, rather than where the audited activities were conducted. This limits ASQA's ability to draw conclusions about the extent and nature of risk associated with different approaches to delivering VET for school students in each state and territory. This limitation does not apply to enrolment and student number data used in the scoping study.

5.1.2 Findings

ASQA found a similar prevalence of serious and critical non-compliance findings at audit among VETDSSS providers when compared to providers in general. A similar result was also found when comparing the number of audits at which there was a finding of non-compliance for VETDSSS providers compared to all providers.

See Appendix 3 for the prevalence of non-compliance among VETDSSS providers compared to the broader VET sector.

5.2 Standards of concern

5.2.1 Approach

ASQA identifies standards of concern, which are clauses in the *Standards for RTOs 2015* most likely to be associated with non-compliance, by analysing:

- the number of finalised Performance Assessments (audits) that include non-compliance with the clause
- how frequently breaches against the clause are alleged in complaints to ASQA.

In our routine operations, we use information about standards of concern to:

- assess the risk associated with individual providers
- prioritise the direction of our regulatory activities
- inform our understanding of systemic risk
- contribute to the information we share with providers to support continuous improvement in training.

We applied the same method to identify the standards of concern among VETDSSS providers and compared these to the standards of concern for the VET sector, in general, for the same time period for calendar years from 2016 to 2019.

The standards of concern published in the scoping study do not align with those published in our previous Regulatory Strategy for the corresponding year. This is due to the different reporting periods.

The scoping study used calendar year reporting to align with other data relating to VETDSSS providers prepared for the scoping study. Therefore, data in this report may differ from the standards of concern reported in previous years in ASQA's Regulatory Strategy because:

- additional data becomes available after the point-in-time reporting that was used to inform the Regulatory Strategy
- a reporting period from April to March has been used to identify standards of concern in ASQA's Regulatory Strategy, rather than a calendar year.

See Appendix 4 for the standards of concern for VETDSSS providers and the broader VET sector from 2016 to 2019.

5.3 Audit sample

To understand the nature of non-compliances that ASQA has found in the delivery of training and assessment activity to school students, ASQA has drawn on a sample of historical audit reports and our Quality Assessors' regulatory intelligence. The term 'audit' is used here to distinguish these historical reports from ASQA's new Performance Assessment methodology (ASQA, 2021).

To inform our assessment of the risk to quality, we identified a sample of audit reports relating specifically to VETDSSS training and assessment activity. The sample included audits of providers delivering VET to a mix of school students and general VET students with both cohorts included in the scope of audit.

A total of 11 sample audit reports were identified in the period from 2015 to 2020. This period extends beyond the data range from 2016 to 2019, in order to include a larger sample of audits concerning the delivery of VET to school students than would otherwise be available.

The providers audited in the 11 reports drawn on for this study ranged in size from those delivering to fewer than 300 students, to those delivering to over 25,000 students. Nearly all the providers in the audit sample used third-party arrangements.

The sample of 11 audits included providers delivering in all states and territories, except the Australian Capital Territory. Of the sample of 11 audits, 2 were undertaken with the same provider in different years (2017 and 2018).

The 11 audit reports use a sample of qualifications, from Certificate I level to Diploma level. The most commonly sampled qualification was Certificate II in Hospitality (3 audits), but there was no significant difference in which qualifications were the focus of audits.

Other qualifications sampled include, but are not limited to:

- Certificate II in Information, Digital Media and Technology
- Certificate III in Sport and Recreation
- Certificate II in Community Services.

The type of data collected about providers in the audit reports sampled for this study varies. Despite this, it is possible to describe some features of the audit sample.

The results of the review of sample audits are discussed Appendix 5.

6. Stakeholder consultations

To inform our understanding of the risks and delivery of VETDSSS, ASQA conducted consultations between November and December 2019. We consulted state and territory government departments with responsibilities for VETDSSS, non-government schooling sectors (responsible for delivering education for a significant proportion of Australian secondary school students), curriculum authorities, employer and employee representatives and peak VET sector groups.

6.1 How we consulted

ASQA conducted 9 roundtables with government and education sector stakeholders. One roundtable was held in each jurisdiction and one at the national level. The roundtables involved a total of 72 participants, representing 44 agencies across Australia. Interviews were held with 40 participants from 30 different stakeholder organisations. Appendix 6 lists the individual stakeholder organisations consulted.

The roundtable discussions and interviews were conducted using a semi-structured format, guided by key talking points to enable comparison between jurisdictions and stakeholder groups. The approach was designed to solicit stakeholder views about the:

- purpose of, and desired outcomes from VETDSSS
- issues that impact on the quality of VETDSSS and factors that contribute to a 'good' program
- regulatory and compliance issues associated with VETDSSS
- actions that may be required in partnership with key stakeholders to address any regulatory concerns identified
- aspects of VETDSSS that could benefit from greater national consistency.

ASQA re-engaged with stakeholders in late 2020, to seek feedback from state and territory government departments with responsibility for skills and education on the key themes identified during the initial consultation, as well as ASQA's understanding of the VETDSSS delivery arrangements in each state and territory.

6.2 What we heard

We identified common themes in stakeholders' views about what contributes to success in the delivery of VET to school students, as well as the key challenges and regulatory concerns.

Stakeholders identified outcomes of quality VETDSSS as including employment pathways, exposure to the workplace, work skills, applied education, and student engagement and retention. Key enablers are those factors that influence the degree to which these outcomes are achieved. This includes quality work placements, the school environment, teacher quality and retention, dedicated student support, school leadership and other factors (see Figure 3).

Figure 3: Enablers (outer circle) and outcomes (inner circle) of quality VETDSSS identified by stakeholders



Stakeholder feedback is discussed where it is relevant to the scoping study findings. In particular, to describe the risks associated with the common areas of non-compliance identified. See Appendix 7 for a more detailed description of the key themes identified throughout the scoping study consultation.

7. What the scoping study found

The key findings of the scoping study are:

- The scoping study did not find evidence to suggest VETDSSS is of lower quality than other VET.
- ASQA's regulatory data does not show a higher prevalence, or rate, of non-compliance among providers of VET for secondary school students, compared to providers in general.
- The study found 5 common areas of non-compliance. These are also common areas of non-compliance in the VET sector in general. These 5 areas are:
 1. assessment and certification
 2. amount of training
 3. students being properly informed, protected and supported
 4. industry currency and vocational skills of trainers and assessors
 5. oversight of third-party arrangements.
- While these areas of non-compliance are also common in the broader VET sector, our review of stakeholder feedback and arrangements for VETDSSS indicates that policy settings can incentivise behaviours that increase the risk of specific non-compliances in the VETDSSS context. This can compromise the quality of some VETDSSS.

7.1 Quality and perceptions of quality in VETDSSS

ASQA did not find any evidence in our regulatory data to suggest that VETDSSS is of lower quality than that delivered within the VET sector in general. The rate of serious and critical non-compliance among providers of VETDSSS is similar to that found in the VET sector more broadly (see Appendix 3).

Stakeholders identified many examples of good practice in VETDSSS that result in positive outcomes for students and employers. The factors most commonly identified during consultation as contributing to successful VETDSSS programs were:

- school leadership that values VET as an appropriate pathway and understands competency-based training and assessment
- dedicated VET coordination in schools and support for teacher/trainer development
- dedicated student support with strong knowledge of VET pathways, including early career counselling, assessment of student needs and interests, and assessment of suitability for specific VET programs
- close engagement between schools, parents, providers and local employers or industry, including appropriately structured work placement
- quality training facilities
- flexibility in delivery models.

It is important to highlight that, where schools have a track record of sustaining high-quality VET over a period of time, the success of the program is often attributed to the efforts of a particularly dedicated individual teacher/trainer, VET coordinator or school principal. The loss of these individuals is associated with risks to the sustained quality of VET programs. This suggests the factors contributing to success are not institutionalised within the school sector to the extent required to ensure the quality of VETDSSS is consistent across schools and jurisdictions.

It is also common for reviews addressing VETDSSS to note the many examples of individual schools offering exemplary programs with demonstrated outcomes. Research points to the short- and longer-term benefits of students' engagement in VETDSSS (for example, NCVER 2020c). The Senior Secondary Pathways Review identified that young people undertaking VET are generally positive about their outcomes, and communicate their enjoyment of a more practical approach to learning and the opportunities for real-world experience (Education Council 2020, p. 82).

Despite this, there is general agreement among stakeholders, and in the findings of previous reviews, about longstanding concerns with VETDSSS. Stakeholders also expressed these concerns in feedback provided to ASQA to inform the scoping study. Recent reviews raise similar concerns. The Senior Secondary Pathways Review noted that:

VET delivered to senior secondary students is of inconsistent quality, difficult to navigate, and not well integrated into senior secondary studies. VET qualifications delivered in schools need to meet clearly defined standards and deliver or contribute to credentials that are accepted in the labour market. (Education Council 2020, p. 76).

Joyce (Commonwealth of Australia 2019, p. 95) also conveys some of the challenges of competency and qualification levels that permeate discussion about the quality of VETDSSS:

The Review was informed by many stakeholders that some of the certificates school students are completing are not meeting industry's needs and do not provide a pathway to a job. In particular, employers are not confident that graduates of certificate IIIs and some certificate IIs delivered in schools, have the skills and competencies the qualifications denote and are, therefore, not ready for the workplace.

During consultation, many stakeholders, including state and territory departments with responsibility for schooling, curriculum authorities and non-government schooling sectors expressed a high degree of confidence that schools are focused on the best interests of students and take seriously their duty of care associated with school attendance. This can lead to a presumption that VET programs offered by, or through, schools are of a suitable standard. There also appears to be a view that a different, or lower, level of compliance is acceptable in the delivery of VET to secondary school students.

This confidence, both in schools as educators and within schools, may contribute to a level of complacency about the quality of VET, as defined by the VET Quality Framework, for secondary school students.

This indicates that there is a risk that some students who have undertaken VET through school may not have the competencies they are certified to hold. This may disadvantage students in their pursuit of work, or further education and training. It could also put the student at risk in the workplace, if they are underprepared to work safely. These outcomes are of concern to ASQA, but the risk drivers are embedded in non-regulatory policy settings.

Features of VETDSSS, such as the tendency of some schools to prioritise academic pathways over VET pathways, can result in insufficient attention being paid to ensuring that the right conditions are in place for students to receive high-quality VET. Even when VETDSSS is done well, the characteristics of VETDSSS embedded in educational policy settings can contribute to a perception that all VET undertaken by school students is of poor quality.

7.2 Risks to the quality of VETDSSS – analysis of regulatory data

In examining the regulatory data held by ASQA, we compared VETDSSS providers with the broader provider cohort and found common issues in both groups. We did not find evidence that these issues were more prevalent or more serious among VETDSSS providers.

While the regulatory data held by ASQA does not allow us to examine issues specific to VETDSSS delivery for individual providers, we are able to compare audit outcomes for VETDSSS providers against those of the general VET provider population.

ASQA's reforms in 2021 include updating terminology to reflect concepts and approaches underpinning regulatory best practice. An example of this includes the move from audits to Performance Assessments. For the purposes of this report, where we draw on practices prior to the recent reforms, we continue to use historically specific terminology.

The term monitoring also refers to a broader range of activities ASQA will undertake to collect intelligence about providers and the sector to inform our assessments of performance and risk, and to develop targeted regulatory responses to identified risk or poor performance.

Based on the analysis of our regulatory data, the common areas of non-compliance among providers delivering VET to secondary school students are generally the same as those seen across the VET sector.

These include:

- the consistency of assessment with training package requirements and the Principles of Assessment outlined in the *Standards for RTOs 2015*
- how the amount of training has been determined for individual students
- the industry currency and vocational skills of trainers and assessors
- students being properly informed, protected and supported
- appropriate oversight of training and assessment delivered through third-party arrangements.

Our analysis of the factors contributing to these risks was based on the findings of our review of the literature, stakeholder consultations, and analysis of the policy settings and reforms across jurisdictions. It provides further support to the findings of previous reviewers that the complexity of VETDSSS policy settings can incentivise behaviours by schools and providers that may put the quality of VETDSSS at risk.

This section sets out each of the common non-compliance areas identified, indicators of risk, and the risk drivers that contribute to their occurrence in the VETDSSS context.

It is not suggested that these areas of non-compliance occur in all schools, but they are systemic risks within VETDSSS.

How ASQA talks about risk

Risk assessment

Statement of likely risk associated with VETDSSS.

Indicators of risk

Standards of concern: ASQA regularly monitors the clauses in the *Standards for RTOs 2015* that are of most concern (i.e. the clauses in which providers are most likely to be at risk of non-compliance). Analysis for the scoping study used the same parameters to identify standards of concern associated with VETDSSS providers.

Sample of audits: A sample of 11 audits conducted by ASQA, since 2015, concerning VETDSSS was reviewed as part of the analysis.

Stakeholder concerns: Key issues raised by stakeholders during consultation, and also present in previous research and review reports.

Risk drivers

Drivers for non-compliance that are specific to VETDSSS.

7.3 Assessment and certification

7.3.1 Risk assessment

There is a risk that some VETDSSS providers are conducting assessments that are inconsistent with training package requirements and the Principles of Assessment and Rules of Evidence outlined in the *Standards for RTOs 2015*.

7.3.2 Indicators of risk

Standards of concern

The following clauses within the *Standards for RTOs 2015* have been established by ASQA as standards of concern:

- Clause 1.8 (implement effective assessment systems) is consistently identified as the highest-ranking standard of concern for all providers, and among VETDSSS providers is the highest-ranked standard of concern in each of the 4 years from 2016 to 2019.
- Clause 3.1 (AQF certification is issued only where the student has been assessed as meeting training product requirements) is consistently identified as one of the top 10 standards of concern for all providers, and among VETDSSS providers it ranks as the fifth highest standard of concern.

Sample of audit reports

Within the audit sample, almost all providers were found non-compliant with clause 1.8.

- Ten audits found providers to be non-compliant in relation to clause 1.8.
- After rectification, 5 of these audits found providers to be compliant.

Stakeholder concerns

Stakeholders report that students, parents/caregivers and schools can expect students will complete the qualification, or VETDSSS program, in which they are enrolled within the 2-year time frame of senior schooling. This is, in part, due to the embedding of VET qualifications in senior certification requirements. Stakeholders report that this can put pressure on schools and providers to certify students who have not yet achieved competency.

School students holding certificates attesting to competencies they do not have is a common stakeholder concern. In particular, employer and employee representatives raised the following concerns:

- Students are not properly assessed against the required units of competency.
- Students may not cover the range of skills and knowledge required for competent performance.
- Assessments are often not integrated with sufficient practical experience to ensure students are in possession of the competencies implied by their qualification.

These contribute to broader concerns about student employability and safety in the workplace.

7.3.3 Risk drivers

Factors in the delivery of VETDSSS that may increase the potential for non-compliant assessment within VETDSSS programs include:

- senior certificate requirements to complete VET minimum units of competency, or full qualifications to achieve sufficient credit towards an SSCE
- timetabling issues that act to constrain the amount of time available for VETDSSS, reducing the time available for training and assessment, particularly in practical components
- lack of clarity in relation to whether a student's competency has been appropriately assessed, resulting from the integration of VET qualifications within school curriculum and assessment
- inadequate distinction between VET assessment and school assessment requirements for SSCE credit where VET training and assessment is integrated with school-based learning and assessment
- school facilities and equipment used for at-school training may not meet training package (or accredited course) requirements.

7.3.4 Risk management and continuous improvement

ASQA supports providers to understand their obligations regarding their assessment and certification practices as outlined in the *Standards for RTOs 2015*. This includes advice provided in the Users' Guide to the *Standards for RTOs 2015* about how to apply the Principles of Assessment, implement the Rules of Evidence and validate assessment. ASQA also requires applicants to demonstrate that they have developed all required assessment systems and materials for each training product included in their application, in order to register or add an item to scope.

ASQA's guidance includes advice where these services are delivered by third parties, which are required to be the subject of a third-party agreement.

ASQA acknowledges that some state and territory departments of education and curriculum authorities reiterate the requirement for assessment and certification to be consistent with training package or accredited course requirements, and the Principles of Assessment and Rules of Evidence within their own VETDSSS policies and procedures.

In some states and territories, departments of education or curriculum authorities provide additional guidance regarding competency-based assessment to support schools operating as providers, or working in partnership with providers in order to achieve consistency with VET assessment requirements.

There is also variation in the extent to which different jurisdictions implement SSCE credit requirements to allow additional time for students who do not achieve competency within an allocated amount of time, to achieve competency where this is required to obtain credit towards an SSCE.

7.4 Amount of training

7.4.1 Risk assessment

There is a risk that the amount of training provided in VETDSSS may not take sufficient account of the existing skills, knowledge and experience of each student, and may not allow enough time for the student to meet the requirements of each unit of competency or module in which they are enrolled.

The AQF and the various standards use different terminology to define course duration in the VET system. These are summarised in Table 4.

Table 4: Definitions of duration

AQF volume of learning	Nominal duration	Amount of training
<p>The AQF provides a range for the amount of time a student is expected to take to gain a qualification at each AQF level, which is defined as the 'volume of learning' range for that qualification. Volume of learning includes all activities (supervised and unsupervised) a student does to achieve a qualification.</p> <p>Volume of learning is not ascribed to units of competency. Volume of learning is expressed in equivalent full-time years and hours. Under the Standards for Training Packages 2012, training packages must comply with the AQF volume of learning specification for the qualification type.</p>	<p>The nominal duration of a course comprises the nominal hours for each of the units of competency, plus the unsupervised hours of the course that are added together to identify the AQF volume of learning for the course. Nominal hours represent the supervised structured learning and assessment activity required to sufficiently address the content of each unit of competency. Nominal duration, expressed in hours, must be included in VET accredited courses.</p>	<p>This term is used in clauses 1.1 and 1.2 of the <i>Standards for RTOs 2015</i>. The term 'amount of training' is not defined. Providers are required to ensure the amount of training provided meets the requirements of the training package or VET accredited course qualifications.</p>

Source: *A Review of issues relating to unduly short training* (ASQA 2017a, p. 41)

7.4.2 Indicators of risk

Standards of concern

The following clauses within the *Standards for RTOs 2015* have been established by ASQA as standards of concern:

- Clause 1.1 (have appropriate training and assessment strategies and practices, including amount of training) is the second highest standard of concern for VETDSSS providers
- Clause 1.2 (appropriate amount of training is provided, taking account of the skills, knowledge and experience of the student and mode of delivery) ranks at 10 out of the 14 standards of concern for VETDSSS providers.

Sample of audit reports

Within the audit sample, most providers were found non-compliant with clauses 1.1 and 1.2.

In 9 audits, providers were found non-compliant with clauses 1.1 and 1.2. After rectification, 4 of these providers were found compliant with clause 1.1 and 5 with clause 1.2.

Stakeholder concerns

Stakeholders reported that it is common for VETDSSS programs to deliver a less than appropriate amount of training. In particular, stakeholders external to the schooling sector linked this concern to the limited pre-existing industry experience of typical school students. Schooling sectors, on the other hand, were cognisant of the challenges of fitting all the requirements for senior schooling, including VET, into 2 years.

Some stakeholders reported that VETDSSS providers see the amount of training as one of the biggest regulatory risks within their own operations, along with trainer qualifications (see 4.2.3).

Stakeholders specifically expressed concern about whether school students have sufficient time to complete Certificate III, or higher-level qualifications, where there can be a requirement of up to 150 training hours to be accommodated within a school timetable.

7.4.3 Risk drivers

School timetables, limited school resources, along with the typical 2-year time frame for senior secondary schooling, can constrain the amount of training delivered to school students. While unduly short training also occurs in the broader VET sector (ASQA 2017a), it has the potential for greater impact on school students. School-aged students are a cohort more likely to have limited industry experience and require training of a longer duration within a recommended range.

Some providers will be prepared to compromise on quality by reducing the amount of training to meet the timetabling and budgetary needs of the school. When schools are operating within these constraints, but are unaware of the requirements and implications of not providing adequate training, a mutually agreeable but, potentially, non-compliant arrangement may emerge.

The amount of training is also addressed in Recommendation 9 of the Senior Secondary Pathways Review (Education Council 2020, p. 21), which emphasises the centrality of allocating time based on what is in the best interests of the student:

'When undertaking a formal VET qualification or school-based apprenticeship or traineeship, the allocation of time spent by students at school, with a registered training organisation, or in the workplace should be based upon what is in their best interests, rather than upon funding arrangements or administrative convenience' (Education Council 2020, p. 21).

The likelihood of Australian school students receiving an insufficient amount of training is greater when school students are enrolled in higher-level qualifications (Certificate III and above). These qualifications require greater amounts of training for students who start with limited pre-existing experience.

Based on NCVER VOCSTATS (2020), there is only a small percentage of all training package qualification enrolments at Certificate IV and Diploma level (Appendix 1).

However, this is still 5,548 enrolments, the majority of which are in the Diploma of Business (2,980) and Certificate IV in Business (875) (Appendix 1). Enrolments within the Diploma of Business also appear to be exclusively within one jurisdiction. The next most popular Certificate IV qualifications are Certificate IV in Education Support (258) and Certificate IV in Fitness (240).

Concerns about the amount of training required by these higher-level courses is less of a concern when the scale of this impact is considered.

7.4.4 Risk management and continuous improvement

Under the *Standards for RTOs 2015*, providers are responsible for determining the amount of training required for each student. This determination is based on the student's existing skills, knowledge and experience, the mode of learning and the number of units of modules in which they are enrolled. This is one area for which responsibilities can be blurred when providers are working with schools as external providers under a third-party arrangement, or as a school-RTO, and VET is programmed to be delivered within a 2-year senior secondary schooling timetable.

ASQA undertook a review of issues relating to unduly short training in 2017. It was initiated in response to concerns raised through our regulatory findings and previous strategic reviews that unduly short training prevents learners from gaining the skills and competencies required to be certified as competent from VET courses. The review found that concern about unduly short training is widespread and longstanding and that the long-term sustainability of the VET system was at risk unless the issue of unduly short training was definitively addressed.

Outcomes from this completed strategic review into unduly short training informed the continuous improvement of ASQA's regulatory approach, prompted training package updates and contributed to broader VET sector reforms. In September 2019, the COAG (Council of Australian Governments) Skills Council agreed to amend the *Standards for Training Packages 2012* to support implementation of Recommendation 2 (in exceptional circumstances). The intent of the other 2 recommendations will be met through ongoing broader VET sector reforms.

Some states and territories set a limit on the level of qualification considered appropriate for school students based on what is considered achievable within school timetables. In some cases, VETDSSS students are unable to enrol in certain levels of qualifications without approval by exception.

7.5 Vocational competency and industry currency

7.5.1 Risk assessment

There is a risk that trainers and assessors delivering VETDSSS do not hold a qualification in the vocational competencies they are teaching and/or do not have current industry experience.

7.5.2 Indicators of risk

Standards of concern

The following clauses within the *Standards for RTOs 2015* have been established by ASQA as standards of concern:

- Clause 1.3 (have the resources to provide quality training and assessment, including sufficient trainers and assessors, learning resources, support services, equipment and facilities) is the third highest ranking standard of concern for VETDSSS providers.
- Clause 1.13 (employ skilled trainers and assessors) ranks as the twelfth highest standard of concern for VETDSSS providers.

Sample of audit reports

Within the audit sample, most providers were found non-compliant with clause 1.3.

- Nine audits found providers to be non-compliant with clause 1.3.

Within the audit sample, more than half the audits found providers to be non-compliant with clause 1.13.

- Seven audits found providers to be non-compliant with clause 1.13 (one audit did not assess compliance against clause 1.13).

The nature of non-compliances included trainers and assessors without relevant vocational competencies, current industry skills or professional development for the training products reviewed at audit. There were also cases where sufficient evidence could not be provided to demonstrate that appropriate professional development had been undertaken.

Stakeholder concerns

The challenge of a short supply of qualified trainers with current industry experience to deliver VET for school students was a concern across all school sectors. Where a school is delivering VET as a school-RTO, or in partnership with a TAFE or private provider, its teachers should hold the correct industry qualifications, as well as the Training and Education (TAE) qualification and teacher registration. They must also maintain currency. There is significant criticism about the capacity of teachers to deliver VET, even when they hold the industry qualification. Lack of currency is often a criticism.

Schooling sectors also reported that it can be difficult for schools to build expertise in VETDSSS. Stakeholders attribute the success of VETDSSS programs to individual teachers or school principals, and schools compete for those individuals. Instability in VET programs is also created when VET teachers transfer between schools.

Many non-school VETDSSS providers also report that they find it difficult to attract and retain staff who hold VET and TAE qualifications, as well as industry currency. Where a trainer from a TAFE or private provider is delivering in a school, they are also required to have a teaching qualification, or an exemption to teach if it is available in that jurisdiction. This adds costs for individual staff. Providers consulted said that complying with requirements for trainer qualifications and industry currency is one of the greatest regulatory risks for providers working with schools to deliver VETDSSS.

Stakeholders recognise the challenge for teachers in maintaining industry experience while working as a teacher, and for VET trainers obtaining the required teaching qualifications to teach VET in the school environment.

7.5.3 Risk drivers

It is argued that a sector-wide shortage of properly qualified and experienced trainers and assessors is more pronounced in VETDSSS, where there is an additional requirement for trainer-assessors to be qualified teachers to deliver VET to school students within schools and school-RTOs.

This dual qualification requirement and requirements to maintain current industry skills and ongoing professional development in both fields are widely acknowledged as difficult to meet and there is little alignment between the 2 qualifications. Teaching qualifications often do not include a sufficient focus on developing knowledge and skills related to applied learning and competency-based assessment for VET teacher-trainers. There is also little focus in the Certificate IV in Training and Assessment on how to train and support school-aged learners and meet their specific needs.

Some stakeholders reported a lack of appreciation within some schools for the knowledge and skills required to deliver competency-based training, saying there was more emphasis on education knowledge and pedagogy.

Schools are reported to find retaining qualified teacher-trainers challenging, and this creates an ongoing need to support staff in obtaining and maintaining their VET qualifications, competencies and industry skills. This support adds to the cost of delivering VETDSSS.

This issue was acknowledged in the Western Australian Inquiry (Parliament of Western Australia, 2017, pp. viii and 45). Finding 7 (2017, p. 47) recommended that 'The extra qualification and vocational currency requirements for VET teachers are exacting a toll on teachers and challenging school resources.' Finding 10 (Parliament of Western Australia 2017, pp. viii and 57) noted 'The difficulty in attracting and/or retaining qualified teachers threatens the delivery of VET qualifications in regional and remote schools'.

In Recommendation 6, the inquiry recommended that 'the Teacher Registration Board of Western Australia considers amending its accreditation standards for initial teacher education programs to include a vocational teaching component for secondary teachers, either as an elective or a core unit.'

The Australian Institute for Teaching and School Leadership (AITSL, 2021) recently prepared a report to inform the implementation of Recommendation 10 of the Senior Secondary Pathways Review (Education Council 2020) that the Education Council and Skills Council should co-design with industry a national strategy on VET in Schools that promotes the quality of VET. The report identifies that:

Greater support for dual qualified VET teachers would improve the quality and consistency of VET delivered in schools and therefore actions to support those who wish to gain and maintain dual qualifications would support greater consistency in quality (AITSL 2021, p. 12).

In addition, stakeholders consulted for the scoping study reported that there is little or no benefit in teachers taking on the additional responsibility of teaching VET, and this exacerbates the challenges of retaining teacher-trainers.

7.5.4 Risk management and continuous improvement

The *Standards for RTOs 2015* do not prescribe how trainer and assessor requirements need to be met. However, the Users' Guide to the *Standards for RTOs 2015* advises that in relation to clause 1.13(a), holding the vocational qualification they deliver is evidence of a trainer's vocational competence. ASQA also provides substantial guidance in the Users' Guide to the *Standards for RTOs 2015* to help providers demonstrate whether a trainer-assessor meets the vocational competencies and industry currency requirements, or can demonstrate equivalence. Notwithstanding, this is still an area that attracts substantial requests for clarification from providers.

Providers remain accountable, however, when teachers are not able to demonstrate vocational competence and must be prepared to provide appropriate supervision of training when teacher-trainers cannot meet the requirements.

States and territories use the provision of an authority, or permission to teach to differing degrees, to make it possible for VET trainer-assessors to deliver VET onsite in schools without being a teacher. This is generally not considered a permanent staffing measure, but is used to secure appropriately qualified trainers-assessors to deliver VET to secondary school students.

Some states and territories also support schools in determining whether they have the capacity to deliver VET prior to offering the program. Such preliminary assessments can include consideration of the availability of trainer-assessors. When preparing to register as a provider, schools would need to ensure they meet registration requirements. Such preliminary assessments, however, are likely to help schools in the decision-making process to determine whether they have the capacity to meet the requirements of a third-party arrangement or to procure and oversee the delivery of VET by an external provider for their students.

AITSL (2021) considered ways to achieve greater alignment between the Certificate IV in Training and Assessment and Initial Teacher Education (ITE) qualifications, despite the substantial difference in AQF levels of these qualifications (Level 4 and Level 7) and the possibility of future changes to TAE (AITSL 2021, p. 20). AITSL also identified potential pathways for those who possess a Certificate IV in TAE to undertake ITE programs (AITSL, 2021, p. 14–16) along with options to support those with vocational industry experience and an interest in VET for school students into TAE (AITSL 2021, pp. 16–18).

7.6 Students are properly informed, protected and supported

7.6.1 Risk assessment

There is a risk that VETDSSS providers, including school-RTOs, are not properly informing, protecting and supporting VET students. This includes assessing each student's skills, knowledge and experience (see section 7.4.2), as well as assessing the likelihood of each student successfully completing their VET course/s and qualification/s prior to enrolment in VETDSSS programs.

7.6.2 Indicators of risk

Standards of concern

There are 4 clauses concerning the provision of information, support and protection to individual learners that rank among the top 14 standards of concern for VETDSSS providers. The following clauses within the *Standards for RTOs 2015* have been established by ASQA as standards of concern:

- Clause 1.3 (have the resources to provide quality training and assessment including sufficient trainers and assessors, learning resources, support services, equipment and facilities) is the third highest standard of concern for VETDSSS providers.
- Clause 1.7 (supporting and informing students, managing complaints and appeals) consistently ranks as a higher-level concern among VETDSSS providers than for the VET sector as a whole, and has been of increasing concern between 2016 and 2019. Overall, clause 1.7 ranks as the ninth standard of concern for VETDSSS providers for the 4-year period 2016 to 2019.
- Clause 1.2 (appropriate amount of training is provided, taking account of the skills, knowledge and experience of the student and mode of delivery – see 4.7.2) ranks as the tenth highest standard of concern among VETDSSS providers.
- Clause 5.1 (informing and protecting students) ranks thirteenth out of the 14 standards of concern for VETDSSS providers.

Sample of audit reports

Within the audit sample, most providers were found non-compliant with clauses 1.2 and 1.3.

Nine audits found providers to be non-compliant in relation to clauses 1.2 and 1.3.

Compliance against related clauses was assessed less often.

- Clause 5.1 was audited on 9 occasions and of these, 3 found non-compliant providers.
- Clause 1.7 was audited on 7 occasions and of these, 4 found non-compliant providers.

Non-compliance in relation to these clauses generally relates to the inadequate provision of support services, entry requirements and assessment of suitability for enrolment.

Stakeholder concerns

Stakeholders identified good quality career advice that values VET pathways as critical to the success of VETDSSS. Without quality advice, stakeholders said students can enrol in VETDSSS courses that do not suit their needs, skills or interests. Students can also overload their school timetable with too much VETDSSS 'just in case', or make it difficult to balance VETDSSS and academic curriculum commitments – or students may enrol in courses that are not reflective of industry needs or employment opportunities.

Schooling and some VET sector stakeholders expressed concern that providers may not understand the specific needs of senior secondary school students, particularly when they are not closely involved with the school environment or students and, therefore, may not be best placed to provide guidance to school students.

A common concern relating to whether students are being properly informed, protected and supported is the level of resourcing for VET coordinators and the impact this can have on the career advice students receive about VET pathways.

A number of stakeholders pointed out that other factors motivated student choice of VETDSSS programs independent of any advice. For example, school students' choices may be limited to the VET programs available at their school. These limitations may arise from limited funds for VET within school budgets, the availability of necessary facilities or trainers, or the practicalities of course offerings for individual students, or a large number of students. Choices may be restricted to those qualifications that are more affordable for schools to deliver, require less specialised equipment and facilities (or equipment and facilities similar to those in schools), or are easier for trainers to demonstrate industry currency.

The status of particular VET qualifications as alternative entrance requirements to university can also influence students' decisions. Students can undertake, or can be encouraged to undertake, these qualifications with this objective in mind, rather than a qualification being selected based on a student's individual skills, knowledge and experience, and preferred career pathway.

7.6.3 Risk drivers

Secondary students are likely to have limited experience of industry and VET, and have a greater need for targeted support and guidance. Secondary students are also likely to be reliant on their schools and parents for career advice. Therefore, providers play an important role in ensuring all parties advising students, and the students themselves, have appropriate information about their choice of VET program and the suitability of the program for their skills, abilities and interests.

However, the relationship between providers and students can be unclear in VETDSSS. Where schools purchase VET on behalf of students, or where they deliver VET as a third party under the auspices of a registered provider, there can be a lack of clarity about responsibility for the relationship between providers and their students, and the obligations providers have towards individual students.

Providers may also rely on school support services, such as career and guidance counsellors, who may not have a comprehensive understanding of the VET sector, VET pathways or a specific qualification.

Overall, there is a concentration of students in some qualifications. The most popular qualifications in which school students were enrolled to gain credit towards their SSCE in 2019 are listed in Table 3 showing the percentage of total enrolments in each of the most popular 15 qualifications. This concentration of VETDSSS students in particular qualifications occurs in varying extents across the states and territories.

Around two-thirds of student respondents to a survey undertaken as part of the Western Australian Parliamentary Inquiry 'Putting VET to the test' noted they would like to see more courses on offer, and that many 'chose the course they were currently enrolled in because it was the only option, or the best option, and not necessarily because it was something they particularly wanted to pursue' (Parliament of Western Australia, 2017, p. 66).

7.6.4 Risk mitigation and continuous improvement

Providers are responsible for ensuring students are informed, protected and supported under the *Standards for RTOs 2015*. ASQA requires providers to demonstrate that they have determined the support needs of individual learners, and provided access to the educational and support services necessary for the individual student to meet the requirements of the training product.

To help providers understand these obligations, ASQA provides advice through the Users' Guide to *Standards for RTOs 2015* about how providers must support students' progression in their learning.

In the case of school students, decisions about which VET course to undertake are also informed and approved in the school setting. States and territories have brought these 2 streams of advice and support for students together in various ways.

Support for schools and students to select appropriate VET includes lists of VET qualifications identified as appropriate for school students compiled in consultation with industry and the creation of individualised pathways. Pre-enrolment assessment or guidance processes include preliminary VET studies, career planning, suitability assessments, guidance and support regarding enrolling in VET.

The importance of career guidance is emphasised in both the Joyce Review (Commonwealth of Australia 2019, pp. 82–83) and the Senior Secondary Pathways Review (Education Council 2020, p. 14). Recommendation 6 in the Senior Secondary Pathways Review identifies a need to strengthen career guidance within and outside of schools (Education Council 2020, p. 20).

Beyond effective career guidance, flexibility will be critical to successful outcomes, especially for young people. The concept of vocational streams is one that focuses strongly on the needs of individual students, and is addressed in both the Joyce Review (Commonwealth of Australia 2019) and the Senior Secondary Pathways Review (Education Council 2020). This concept is consistent with the intent of the *Standards for RTOs 2015* to consider the needs of each student. Brown (2019), drawing on Moodie et al. (2013, p. 31) describes the pathway concept as:

the focus [is] on the development of the person, the attributes they need and the knowledge and skills they require to work within a broadly defined field of practice, in which educational and occupational progression is combined (Moodie et al. 2013, p. 31, cited in Brown 2019, 21).

7.7 Appropriate oversight of third-party arrangements

7.7.1 Risk assessment

There is a risk that some third-party arrangements between providers and schools are not being managed in a way that supports compliance and assures quality VET.

7.7.2 Indicators of risk

Standards of concern

Clause 2.4 (recording, monitoring and reporting third-party arrangements) was established by ASQA as the fourteenth standard of concern for VETDSSS providers. In each year between 2016 and 2019, clause 2.4 ranked higher as a standard of concern among VETDSSS providers than for the VET sector in general.

Sample of audit reports

Within the audit sample, the majority of audits found providers to be compliant against clause 2.4:

- Two audits did not assess performance against this clause.
- Five audits found providers to be compliant (one after being found non-compliant).
- Three audits found providers to be non-compliant.

The 3 cases of non-compliance against clause 2.4 were of a serious nature. The cases involved inadequate monitoring of training and assessment delivered by schools on behalf of providers. In each of these 3 cases, ASQA took regulatory action against the providers.

Stakeholder concerns

Where schools and school sectors rely on third-party arrangements to deliver VET to school students, stakeholders report frustration at a lack of clarity about the roles and responsibilities of the parties engaged in delivery. Services delivered on behalf of a provider are subject to a written agreement (clause 2.3), but it was common for school sector stakeholders to report a lack of detail in these agreements. These referred to aspects of training and responsibilities relating to work placements and student support.

Stakeholders also reported a tendency for providers that deliver predominantly through third-party arrangements to deliver primarily online training, with limited observation of students or monitoring of teachers.

School sector stakeholders reported that individual schools can find it difficult to choose quality providers and rely on provider expertise in the VET sector.

7.7.3 Risk drivers

Third-party arrangements are used to deliver VETDSSS in varying degrees across jurisdictions. Where it is permitted, schools use third-party arrangements to gain access to facilities, learning resources and expertise in the VET sector. These arrangements can provide an efficient way for schools to deliver VET programs to their students and a secure market for providers.

Risks can emerge when either party to a third-party agreement does not have the knowledge or capacity to deliver quality VET. This can include providers that are not familiar with the needs of schools and school-aged students, or schools that do not have sufficient knowledge or systems to identify quality providers or manage third-party agreements.

A significant driver of risk occurs when providers deliver predominantly, or exclusively, through schools as third parties without adequate monitoring. The emergence of this delivery model is most likely a response to schools' need to source VET within their budget constraints, and the providers' ability to achieve economies of scale by delivering across multiple schools.

Nationally, the largest VETDSSS providers deliver in this way. There is also a large concentration of students among these larger providers, which include private providers, TAFEs and school sector organisations that oversee individual schools to deliver VET (See Appendix 1).

From 2016 to 2019, between 6 and 8 providers oversaw the delivery of VET to 20 per cent of VETDSSS students nationally. There has also been an increasing concentration of students enrolled with these large providers. The number of providers delivering VET to half of VETDSSS students decreased from 41 providers in 2016, to 28 in 2019.

Many of the largest providers also have multiple third-party agreements. In 2019, among the 10 largest providers of VETDSSS, each had third-party agreements for delivering training and assessment with between 50 and over 400 organisations. Across all these providers, the majority of third parties were not registered providers.

Given the large number of students enrolled in schools that are delivering VETDSSS as third parties under the auspices of a small number of providers, this presents a significant risk to quality if training and assessment are not being monitored as required under the *Standards for RTOs 2015*.

7.7.4 Risk mitigation and continuous improvement

Delivery of VET under the auspices of a registered provider can provide schools with an efficient way of accessing VET expertise and industry networks, industry-standard facilities and training resources to deliver VET programs to their students.

While there have been cases involving inadequate oversight of third-party arrangements, there are also examples where third-party arrangements work well. Stakeholders identified providers with close relationships with local industry, employers and schools as a key to successful third-party delivery arrangements.

Under the *Standards for RTOs 2015*, providers are responsible for ensuring training and assessment delivered through third parties is compliant with the multiple clauses in the *Standards for RTOs 2015* that address how providers must manage services provided by third parties.

In 2019, ASQA released a Fact Sheet ([ASQA 2019a](#)) and issued a General Direction ([ASQA 2019b](#)) clarifying the regulatory requirements relating to third-party arrangements, and provides ongoing advice and guidance to providers about the requirements for third-party arrangements.

Some states and territories support schools in establishing third-party arrangements. This includes vetting providers' eligibility to oversee delivery of VET by schools as third parties, guidance and assessment tools to assist schools in the selection of providers with sufficient capacity to partner with schools, and the creation of standard third-party agreements to streamline school administration of third-party arrangements.

There have also been instances of providers withdrawing from offering VETDSSS through third-party arrangements, where there has been a significant risk to quality or their own compliance.

The concentration of school students enrolled in VET, with few providers that deliver primarily or exclusively through third parties, highlights the risk of poor management of third-party providers in VETDSSS. This emphasises the importance of ensuring that providers are self-assuring and continuously improving their delivery through third parties.

7.8 Other risks identified by stakeholders

7.8.1 Risk assessment

There is a risk that there is limited industry engagement in the delivery of some VETDSSS.

7.8.2 Indicators of risk

Standards of concern

Clauses 1.5 and 1.6 (engage with industry) do not rank in the standards of concern among VETDSSS providers. This is, in part, because these clauses have not, historically, been considered to present sufficient risk to warrant inclusion in audits.

Sample of audit reports

Within the audit sample, most providers were not audited in relation to clauses 1.5 and 1.6.

Ten audits did not assess performance against clauses 1.5 and 1.6.

Stakeholder concerns

Stakeholders raised concerns about several aspects of industry engagement with VETDSSS. These included concerns about students' access to industry standard facilities for training and assessment, and the quality and availability of work placements and work experience.

Many stakeholders also expressed the view that a lack of industry engagement can contribute to a poor understanding and perception of the outcomes achieved through VETDSSS.

Schooling sector and industry stakeholders commonly raised industry engagement as a key factor of success for VETDSSS. Stakeholders generally attributed good experiences of industry engagement to highly motivated and skilled VET coordinators, teachers or sector-wide programs designed to support and deliver industry engagement in VETDSSS.

Some of the benefits stakeholders identified included opportunities for teachers to maintain industry skills, and the identification and coordination of work placement opportunities. Benefits also included developing training and assessment strategies and resources with input from industry and an understanding of local employment needs. Like many aspects of the delivery of VET to secondary school students, there are examples of good practice and good outcomes, but they are not of consistent quality.

7.8.3 Risk drivers

There are a number of practices common in the delivery of VET to secondary school students that impede or jeopardise the level of engagement with industry.

These practices include time, capacity and resource constraints within schools delivering VET to students as school-RTOs, or under the auspices of providers. They also include the delivery of VETDSSS under third-party arrangements, where the overseeing provider does not have close engagement with the school or local employers.

Where there is a lack of understanding, or a poor perception of VETDSSS, there is also a disincentive for employers to engage, which exacerbates the problem of industry disengagement.

Brown (2019, p. 13) observes that one of 3 key challenges constraining policy change in relation to VETDSSS is an 'increasing focus on the attainment of entry-level certificates as the key policy measure of effective youth transitions, despite acknowledgement that these qualifications hold limited value in the labour market'. Brown draws on the research of Clarke (2014, p. 7), who describes the concept of a 'problematic certificate paradigm':

there appears to be a simultaneous acknowledgment of, on the one hand, the limited value of both entry-level VET certificates and senior secondary certificates in the labour market and, on the other, an increasing focus on the attainment of these certificates as the key policy measure of effective youth transition (Clarke 2014, p. 7).

7.8.4 Risk mitigation and continuous improvement

Providers are responsible for ensuring training and assessment practices are relevant to the needs of industry and informed by industry engagement.

The challenges of industry engagement for schools are widely acknowledged with successful examples relying on individual principals, VET coordinators, guidance counsellors and teachers. Some states and territories have arrangements in place to support school engagement with industry in relation to VETDSSS. In others, such programs relied on discontinued funding.

The Joyce Review recommends that Skills Organisations be responsible for strengthening industry engagement with schools (Commonwealth of Australia 2019, p. 101).

Given industry relationships to support VET need to exist at the local level, capturing industry input to training and assessment strategies to reflect a local context or provide work placement opportunities, will still rely on individual providers in specific local contexts.

7.9 Nationally consistent regulation

ASQA, along with state-based VET regulators in Western Australia and Victoria, has responsibility for regulation of registered training providers and the standard of VET. In Queensland, the QCAA has responsibility under delegation from ASQA, for VET delivered by school-RTOs up to Certificate IV level.

In his review of the VET sector, Joyce noted that:

While the same national VET Quality Framework applies to all VET, the approach towards quality assurance varies in practice between States and Territories, and different approaches are taken towards overseeing regulation (Commonwealth of Australia 2019, p. 93).

The Joyce Review recommended that:

The Australian Skills Quality Authority and the two state regulators ensure their regulatory activity equally applies to all Registered Training Organisations delivering VET to secondary students (Commonwealth of Australia 2019, p. 98).

In Joyce's view, this is an important step towards building employer confidence in the value of VET certificates held by school students, and maintaining student confidence in the validity of their school-based VET pathways (Commonwealth of Australia 2019, p. 98).

During the scoping study consultation, stakeholders also raised concerns about inconsistent approaches to quality assurance among the different regulators, and discussed the varying quality assurance frameworks instituted by schooling systems in their respective states and territories. At a minimum, the complexity created for schools, providers and employers by these multiple arrangements contributes to the general sense that the quality of VETDSSS is inconsistent and variable.

Stakeholders also proposed suggestions to improve national consistency in VETDSSS. These suggestions included greater regulatory consistency between school-RTOs and other providers, and improving understanding of VET regulatory requirements within the schooling sector. Suggestions to improve schools' understanding of VET regulatory requirements included developing practical guidance and standardised templates for schools, as well as the provision of professional development for principals, teachers and VET coordinators to improve understanding of provider obligations under the *Standards for RTOs 2015*.

Some stakeholders saw a role for the National Careers Institute in promoting inter-jurisdictional consistency, by helping school guidance counsellors and teachers to better understand VET pathways and future career options, and to provide better advice to students. There was a widely shared desire for greater promotion of examples and case studies of quality VETDSSS in practice. Other suggestions included the development and promotion of national strategic initiatives, such as a cohesive strategy for industry engagement.

It is important that any shift in regulatory activity does not create risk or inequality for senior students in their attainment of credits towards SSCEs.

8. Actions and recommendation

The following actions and recommendation are designed to support continuous improvement in the quality of VETDSSS.

They have been developed with consideration for the need of a cooperative approach between ASQA and other stakeholders that share responsibility for VET. They also align with ASQA's strategic objective and supporting four-year strategic deliverables (Figure 4).

Figure 4: The scoping studies actions and recommendation and ASQA's 4-year strategic deliverables



Source: ASQA 2021

It is recommended that the Australian, state and territory governments consider the findings and observations of the scoping study in determining actions to be taken under the new National Skills Agreement to strengthen VET pathways for secondary school students, and to improve the quality and vocational relevance of VET in schools.

The different policy settings that support the delivery of VET to secondary school students can create incentives for behaviours that present risks to quality outcomes. These settings vary across individual delivery models, and a number of jurisdictions have recognised elements of risk and have taken action to address them.

To support the objective of quality VET and to ensure ASQA's approach supports the policy intent set out in the Heads of Agreement for Skills Reform to improve the quality and vocational relevance of VETDSSS ([Commonwealth of Australia 2020](#), p. 2), the following actions and recommendation are made.

ASQA Action 1

ASQA enhance its information and guidance for providers, including school-RTOs, delivering VET to school students to help them better understand their compliance obligations and to support providers to self-assure and continuously improve.

ASQA Action 2

ASQA continue to work with our partners in VET regulation to identify shared risk, regulate VETDSSS consistently with other VET and support national consistency in the quality of VETDSSS.

ASQA Action 3

ASQA enhance its engagement with education departments and schooling sectors to support improved awareness of VET regulatory requirements and their importance in achieving high-quality outcomes for VETDSSS.

ASQA Action 4

ASQA continue to enhance its engagement with states and territories in relation to areas of shared strategic risk, supported by ASQA's ongoing routine monitoring of VETDSSS providers to promote continuous improvement and support public confidence in VETDSSS.

ASQA Action 5

In undertaking ongoing routine monitoring of VETDSSS providers, ASQA will include clause 1.6 of the *Standards for RTOs 2015* in all Performance Assessments (audits) of providers concerning VET delivered to secondary school students.

This is consistent with a greater focus on industry outcomes and will help inform the development of information and guidance for providers under Action 1.

Supporting VET reform

Further to the actions ASQA will take, there is the opportunity for considering this report in the broader context of skills reform.

Recommendation 1

In developing the National Skills Agreement, the Australian, state and territory governments consider how the observations made in this scoping study can contribute to improving the quality and continuous improvement of VETDSSS.

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Appendix 1: VETDSSS delivery and participation

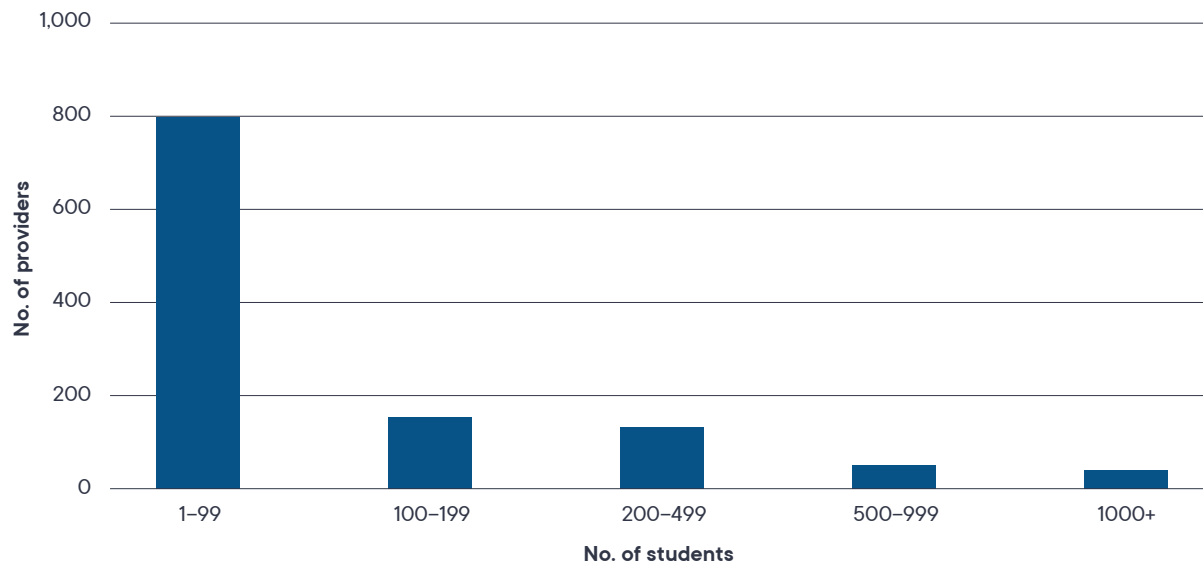
VETDSSS providers

Nationally, private training providers and government school-RTOs dominate the market for delivering VET to school students. There are specific arrangements in each state and territory that create variation in this generalisation. This is discussed in more detail here.

Size of providers

In 2019, there were 1,169 providers of VET to school students nationally (Figure 5). The majority of these providers were small, with between 1 and 99 students. There were 45 providers with more than 1,000 students.

Figure 5: Size of VETDSSS providers, 2019



Source: Based on NCVER VOCSTATS 2020

Concentration of VETDSSS students in large providers

Nationally, there is a concentration of students among the largest VETDSSS providers. These large providers deliver predominantly through schools as third-party providers. In 2019, the 20 largest VETDSSS providers nationally, included private training providers, TAFEs and schools, or school sector organisations that auspice or oversee individual schools to deliver training to school students.

- Between 2016 and 2019, VET for between 36 per cent (2016) and 44 per cent (2019) of secondary students participating in VET was delivered by only 20 providers, some with in excess of 5,000 and even 10,000 students.

- In each of these years, between 6 and 8 providers oversaw the delivery of VET to more than 20 per cent of VETDSSS students nationally.
- Between 2016 and 2019, there was been a concentration of students with large providers, with the number of these providers delivering VET to half of all VETDSSS students decreasing from 41 providers in 2016, to 28 providers in 2019. In the interim years, half of all VETDSSS students undertook their VET with 36 providers (2017) and 32 providers (2018) (NCVER VOCSTATS, 2020).

Delivery by large providers through third-party arrangements

Many of the largest providers have high numbers of third-party agreements. In 2019, among the 10 largest providers of VETDSSS, each had third-party agreements for delivering training and assessment with between 50 and over 400 organisations. Across all these providers, the majority of third parties were not registered providers. However, third-party arrangements are not the only way large providers achieve scale.

Types of providers

Of the 1,169 providers in 2019, 50 per cent were private training providers and 21 per cent were government schools. (Table 5). The next largest groups of providers were community-based adult education providers representing 7 per cent of providers (82) and Catholic schools registered as VET providers (81) delivering VET to school students.

The number of private training providers has decreased since 2016 when there were 651 training providers. There has also been a reduction in the number of every other type of provider since 2016, with the exception of non-government university providers.

Nationally, private training organisations delivered VET to 35 per cent (99,672) of secondary students enrolled in VETDSSS in 2019, government school-RTOs delivered to 25.5 per cent (72,516) and TAFE to 18.5 per cent (52,682) (Figure 6). The remaining students are distributed across a number of different types of providers.

Between 2016 and 2019, the number of enrolments with private providers increased and the number of enrolments with government schools and TAFEs decreased. The enrolment numbers of other providers were comparatively stable over this time period (Figure 6).

The largest 20 providers of VET for school students include predominantly private training providers, TAFEs and schools or school sector organisations that auspice or oversee schools as third parties to deliver training to school students.

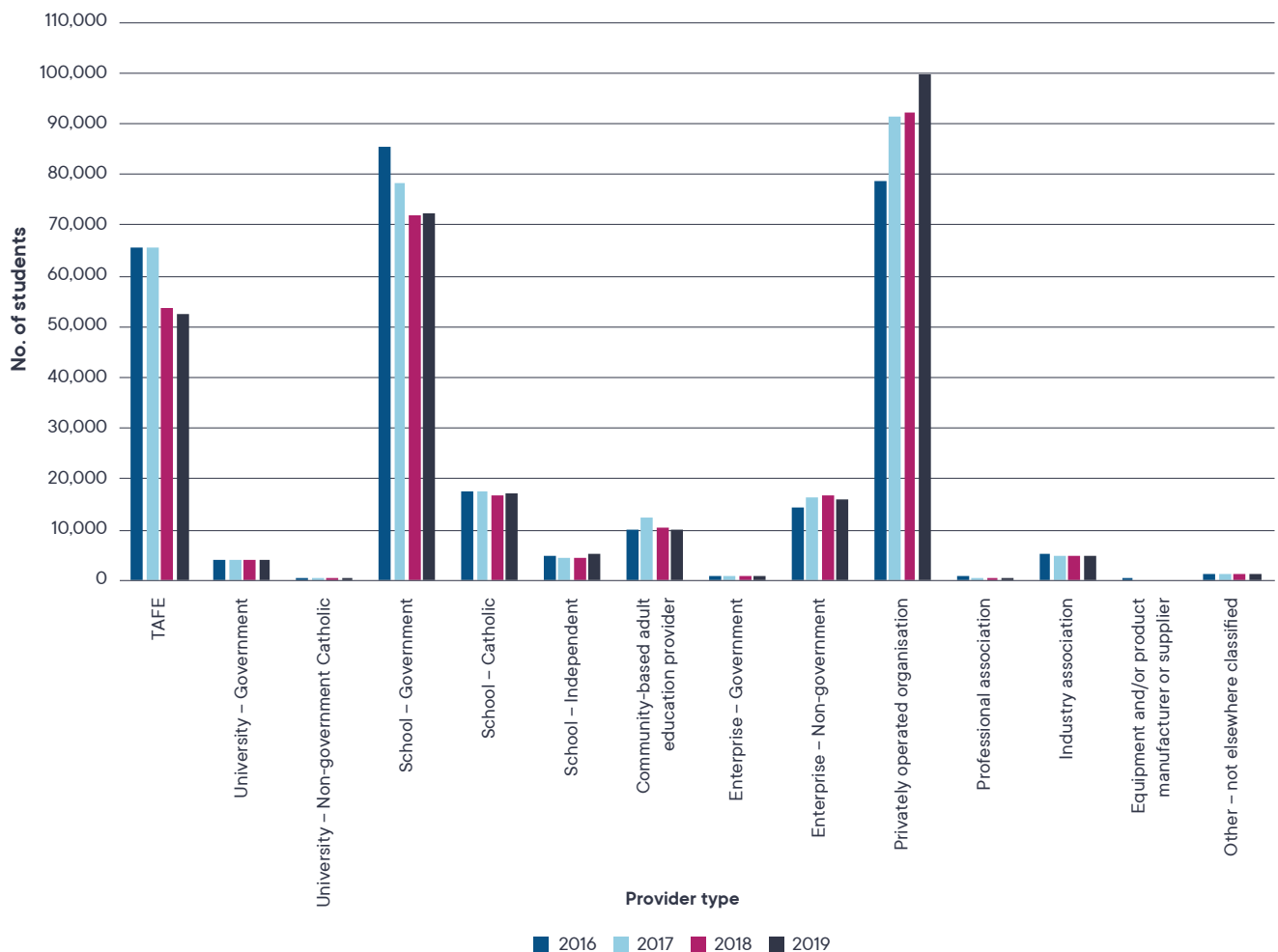
Table 5: Types of VETDSSS providers, 2016 – 2019

Provider type	2016		2017		2018		2019	
	No.	%	No.	%	No.	%	No.	%
Community-based adult education provider	94	7%	88	7%	89	7%	82	7%
Enterprise – Government	15	1%	15	1%	13	1%	13	1%
Enterprise – Non-government	20	2%	14	1%	16	1%	13	1%
Equipment and/or product manufacturer or supplier	1	0%	-	0%	-	0%	-	0%
Industry association	51	4%	42	3%	49	4%	43	4%
Other – not elsewhere classified	15	1%	15	1%	12	1%	9	1%
Privately operated organisation	651	49%	626	50%	610	50%	589	50%
Professional association	6	0%	3	0%	2	0%	4	0%
School – Catholic	90	7%	84	7%	84	7%	81	7%

Provider type	2016		2017		2018		2019	
	No.	%	No.	%	No.	%	No.	%
School – Government	264	20%	246	20%	242	20%	240	21%
School – Independent	66	5%	63	5%	61	5%	61	5%
TAFE	40	3%	40	3%	35	3%	24	2%
University – Government	10	1%	9	1%	8	1%	8	1%
University – Non-government Catholic	1	0%	2	0%	2	0%	2	0%
Grand total	1,324	100%	1,247	100%	1,223	100%	1,169	100%

Source: based on NCVER VOCSTATS 2020

Figure 6: Number of students enrolled with different provider types, 2016–2019



Source: Based on NCVER VOCSTATS 2020

Types of providers operating in each state and territory

This information is reported on a state-by-state basis, as the model for delivering VET to school students influences the enrolment numbers with different types of providers in each jurisdiction (Figure 7).

Australian Capital Territory

Data shows there are only 2 types of providers in the ACT – government and Catholic schools. In 2019, 969 (35 per cent of VETDSSS students) students were enrolled with Catholic school-RTOs and 1,788 (65 per cent) students enrolled with government school-RTOs. The number of students enrolled with both types of providers has declined since 2016. This reflects the overall decline in the number of VETDSSS students from 1,120 (33 per cent at the time) with Catholic school-RTOs in 2016, and 2,244 (67 per cent at the time) with government school-RTOs in 2016.

New South Wales

In New South Wales, most students in 2019 were enrolled with government school-RTOs (26,535, or 53 per cent, of VETDSSS students) and Catholic school-RTOs (9,780 or 20 per cent of VETDSSS students), followed by TAFE (7,033, or 14 per cent, of VETDSSS students). The number of students enrolled with private providers has increased from 563 in 2016, to 1,292 in 2019. This was only an increase from one per cent of VETDSSS students to 3 per cent of VETDSSS students in NSW. The number of students enrolled with TAFE decreased significantly from 15,162 (26 per cent) in 2016 to 7,033 (14 per cent) in 2019.

Northern Territory

In 2019, the largest cohort of VETDSSS students (1,111 students, or 46 per cent, of VETDSSS students) were enrolled with government university providers (Swinburne University and Charles Darwin University). This declined from 1,445 in 2016 (51 per cent in 2016). Students undertaking VETDSSS with government school-RTOs increased slightly from (367, or 13 per cent, in 2016 to 390 or, 16 per cent, in 2019), VETDSSS students at Catholic school-RTOs increased from 50 (1.8 per cent) in the first year of recording students enrolled in 2018 to 70 (3 per cent) in 2019. Private training provider student numbers (174, or 6 per cent, to 385 or 16 per cent) also increased over this period.

Queensland

Private providers and government school-RTOs are the largest providers in Queensland with 42,678 (41 per cent) and 34,772 (33 per cent) students, respectively in 2019. The third largest provider was TAFE with 11,839 students (11 per cent). In 2016, government school-RTOs were the major provider with 42 per cent of students compared to private training providers with 31 per cent of students. Queensland is one of only 3 states or territories (along with Victoria and Western Australia) in which the number of students enrolled in VET while at school increased between 2016 (102,893 students) and 2019 (104,033 students).

South Australia

TAFE and private providers are the largest providers in South Australia where historically, TAFE has auspiced secondary schools to deliver VET. In 2019, TAFE had 5,632 students (43 per cent) and private providers had 4,618 students (36 per cent). The third largest provider type was government school-RTOs with 905 students in 2019 (7 per cent) and community-based adult education in 2019 (also 7 per cent). In 2016, TAFE had 45 per cent of students and private providers had 31 per cent.

Tasmania

In 2019, government school-RTOs were the largest providers with 1,811 students (58 per cent). The second largest provider was TAFE (445 students or 14 per cent) and the third largest provider type was Catholic schools with 304 students (10 per cent). In 2016, government schools were still the major provider with 58 per cent, TAFE with 19 per cent and private providers with 9 per cent.

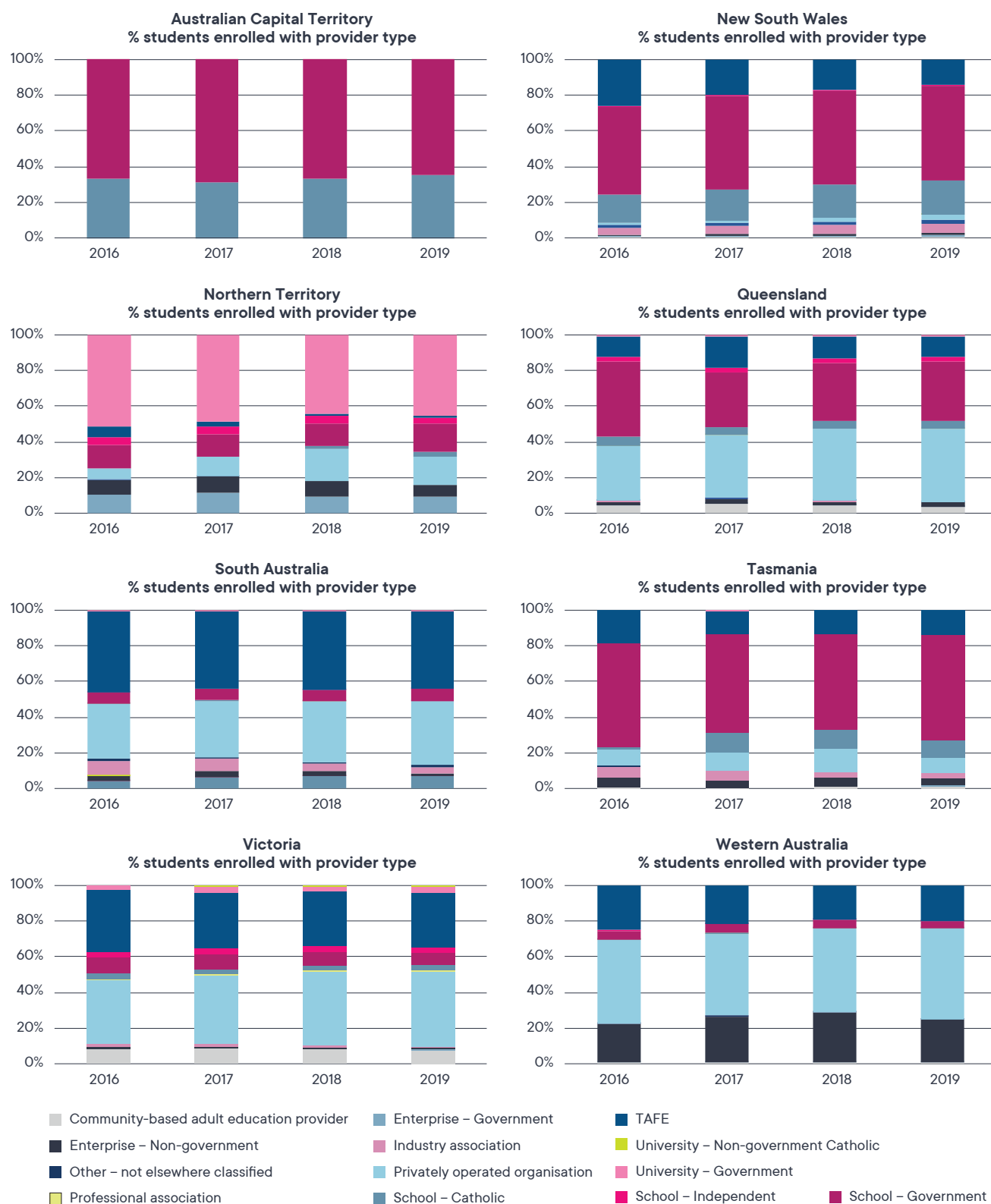
Victoria

Private providers were the largest provider with 24,524 students in 2019 (42 per cent – an increase from 20,504 in 2016, which was 36 per cent of the market at that time). The next largest provider type is TAFE with 17,839 (30 per cent of students) in 2019, a decrease from 19,782 students (34 per cent at the time in 2016).

Western Australia

Private providers were the largest provider type with 25,898 (51 per cent) students in 2019, (an increase from 21,144 in 2016, 47 per cent at the time) and 11,929 (23 per cent) students with non-government enterprises in 2019 (an increase from 9,719, or 21 per cent in 2016). The next largest provider is TAFE with 9,875 (19 per cent) students.

Figure 7: Provider types across states and territories



Source: Based on NCVET VOCSTATS 2020

Training package qualifications undertaken by school students

In 2019, 70 per cent of VETDSSS enrolments were in only 27 training package qualifications. These qualifications are listed in order of popularity in Table 6.

Table 6: Most popular training package qualifications in VETDSSS (by enrolment) 2019

Product code	Training package qualification	2019 Enrolments	%
SIT20316	Certificate II in Hospitality	23,079	7.1%
FSK20113	Certificate II in Skills for Work and Vocational Pathways	21,303	6.6%
BSB20115	Certificate II in Business	20,279	6.2%
SIT20416	Certificate II in Kitchen Operations	13,721	4.2%
SIS20115	Certificate II in Sport and Recreation	13,624	4.2%
CPC20211	Certificate II in Construction Pathways	12,166	3.7%
BSB30115	Certificate III in Business	12,018	3.7%
SIS30115	Certificate III in Sport and Recreation	10,251	3.2%
MEM20413	Certificate II in Engineering Pathways	9,869	3.0%
SIS30315	Certificate III in Fitness	8,485	2.6%
CPC10111	Certificate I in Construction	8,218	2.5%
AUR20716	Certificate II in Automotive Vocational Preparation	6,377	2.0%
ICT20115	Certificate II in Information, Digital Media and Technology	5,817	1.8%
SIR30216	Certificate III in Retail	5,743	1.8%
ICT10115	Certificate I in Information, Digital Media and Technology	5,402	1.7%
SIS20513	Certificate II in Sport Coaching	5,099	1.6%
SIS20213	Certificate II in Outdoor Recreation	4,872	1.5%
CHC30113	Certificate III in Early Childhood Education and Care	4,698	1.4%
SIT30616	Certificate III in Hospitality	4,604	1.4%
UEE22011	Certificate II in Electrotechnology (Career Start)	4,350	1.3%
BSB10115	Certificate I in Business	4,332	1.3%
ICT30115	Certificate III in Information, Digital Media and Technology	4,314	1.3%
HLT23215	Certificate II in Health Support Services	4,243	1.3%
MEM10105	Certificate I in Engineering	4,156	1.3%
CUA20715	Certificate II in Visual Arts	4,132	1.3%
AHC20116	Certificate II in Agriculture	4,011	1.2%
SIT10216	Certificate I in Hospitality	3,762	1.2%

Source: Based on NCVER VOCSTATS 2020

In 2019, most VETDSSS students undertook qualifications at the Certificate II level with Certificate III level qualifications being the second most popular in Table 7.

Table 7: VETDSSS enrolments across different training package qualification levels, 2019

Qualification level	Total enrolments (2019)	%
Certificate I	35,386	11%
Certificate II	196,542	61%
Certificate III	87,368	27%
Certificate IV	2,148	1%
Diploma	3,400	1%
Advanced Diploma	10	0%
Total	324,854	100%

Source: Based on NCVER VOCSTATS 2020

The 10 most popular training package qualifications, at each qualification level, with the exception of the Advanced Diploma level, are shown in Table 8. Enrolment numbers for individual qualifications are not shown for the Advanced Diploma level due to the low number of VETDSSS enrolments in Advanced Diploma qualifications. The 10 most popular accredited qualifications are shown separately in Table 9.

These tables show where concentrations of enrolments exist. This potentially highlights where factors, other than the appropriateness of training products to meet the students' needs based on their existing skills and competencies and students' chosen pathways, may influence enrolment decisions. These could include the availability of funding and employment potential, but also the ease and affordability for delivery at school, arrangements for credit to contribute towards SSCEs or alternative entry to higher education.

The 15 most popular training package qualifications in each state and territory are listed from Table 10 to Table 17.

The 15 most popular are shown here to demonstrate where the concentration of students in particular qualifications tapers.

Table 8: Ten most popular training package qualifications by qualification level, 2019

Certificate I		Enrolments 2019*
CPC10111	Certificate I in Construction	8,220
ICT10115	Certificate I in Information, Digital Media and Technology	5,400
BSB10115	Certificate I in Business	4,330
MEM10105	Certificate I in Engineering	4,155
SIT10216	Certificate I in Hospitality	3,760
FNS10115	Certificate I in Financial Services	2,005
MSF10113	Certificate I in Furnishing	1,730
FSK10113	Certificate I in Access to Vocational Pathways	855
MSM10216	Certificate I in Manufacturing (Pathways)	735
SIS10115	Certificate I in Sport and Recreation	695

Certificate II		
SIT20316	Certificate II in Hospitality	23,080
FSK20113	Certificate II in Skills for Work and Vocational Pathways	21,300
BSB20115	Certificate II in Business	20,280
SIT20416	Certificate II in Kitchen Operations	13,720
SIS20115	Certificate II in Sport and Recreation	13,625
CPC20211	Certificate II in Construction Pathways	12,165
MEM20413	Certificate II in Engineering Pathways	9,870
AUR20716	Certificate II in Automotive Vocational Preparation	6,380
ICT20115	Certificate II in Information, Digital Media and Technology	5,820
SIS20513	Certificate II in Sport Coaching	5,100

Certificate III		
BSB30115	Certificate III in Business	12,020
SIS30115	Certificate III in Sport and Recreation	10,250
SIS30315	Certificate III in Fitness	8,485
SIR30216	Certificate III in Retail	5,745
CHC30113	Certificate III in Early Childhood Education and Care	4,670
SIT30616	Certificate III in Hospitality	4,605
ICT30115	Certificate III in Information, Digital Media and Technology	4,315
CUA30915	Certificate III in Music Industry	3,410

Certificate III		Enrolments 2019
CHC32015	Certificate III in Community Services	2,970
CUA31015	Certificate III in Screen and Media	2,940

Certificate IV		
BSB40215	Certificate IV in Business	875
CHC40213	Certificate IV in Education Support	260
SIS40215	Certificate IV in Fitness	240
CUA40915	Certificate IV in Music Industry	105
CUA41215	Certificate IV in Screen and Media	65
FNS40217	Certificate IV in Accounting and Bookkeeping	65
CHC42015	Certificate IV in Community Services	60
CUA40715	Certificate IV in Design	60
SIS40115	Certificate IV in Sport and Recreation	50
CUA40113	Certificate IV in Dance	40
Diploma		
BSB50215	Diploma of Business	2,980
HLT54115	Diploma of Nursing	80
AVI50215	Diploma of Aviation (Commercial Pilot Licence – Aeroplane)	75
CUA50815	Diploma of Music Industry	35
BSB51918	Diploma of Leadership and Management	25
CHC50113	Diploma of Early Childhood Education and Care	25
SIS50612	Diploma of Sport Development	25
SHB50115	Diploma of Beauty Therapy	20
BSB51415	Diploma of Project Management	20
CUA50113	Diploma of Dance (Elite Performance)	15

Source: Based on NCVER VOCSTATS 2020

* Enrolment numbers in this table have been rounded to the nearest 5 to avoid potential identification once enrolment numbers are under 50.

Table 9: The 10 most popular accredited qualifications, 2019

Product code	Accredited qualification	Enrolments
22338VIC	Certificate II in Building and Construction Pre-apprenticeship	5,781
22470VIC	Certificate II in Engineering Studies	1,870
10297NAT	Certificate II in Applied Language	1,706
22280VIC	Certificate I in Employment Pathways	1,286
52700WA	Certificate II in Plumbing	1,267
22304VIC	Certificate II in Plumbing (Pre-apprenticeship)	1,152
10283NAT	Certificate IV in Crime and Justice Studies	1,053
22473VIC	Certificate II in General Education for Adults	1,032
10741NAT	Certificate III in Christian Ministry and Theology	1,006
22472VIC	Certificate I in General Education for Adults	899

Source: Based on NCVER VOCSTATS 2020

Table 10: Most popular training package qualifications – Australian Capital Territory, 2019

Training package qualification	Enrolments (2019)	%
SIT10216 (REC ID 11) – Certificate I in Hospitality	597	13%
SIT20316 (REC ID 11) – Certificate II in Hospitality	422	9%
SIT20416 (REC ID 11) – Certificate II in Kitchen Operations	360	8%
ICT20115 (REC ID 11) – Certificate II in Information, Digital Media and Technology	333	7%
ICT10115 (REC ID 11) – Certificate I in Information, Digital Media and Technology	270	6%
BSB30115 (REC ID 11) – Certificate III in Business	228	5%
MSF10113 (REC ID 11) – Certificate I in Furnishing	206	4%
SIS20115 (REC ID 11) – Certificate II in Sport and Recreation	192	4%
CPC20211 (REC ID 11) – Certificate II in Construction Pathways	173	4%
BSB20115 (REC ID 11) – Certificate II in Business	157	3%
CPC10111 (REC ID 11) – Certificate I in Construction	146	3%
ICT30115 (REC ID 11) – Certificate III in Information, Digital Media and Technology	142	3%
AUR10116 (REC ID 11) – Certificate I in Automotive Vocational Preparation	124	3%
MSF20313 (REC ID 11) – Certificate II in Furniture Making	122	3%
SIS30115 (REC ID 11) – Certificate III in Sport and Recreation	98	2%

Source: Based on NCVER VOCSTATS 2020

Table 11: Most popular training package qualifications – New South Wales, 2019

Training package qualification	Enrolments (2019)	%
CPC20211 (REC ID 11) – Certificate II in Construction Pathways	9,900	14%
SIT20316 (REC ID 11) – Certificate II in Hospitality	9,001	13%
SIT20416 (REC ID 11) – Certificate II in Kitchen Operations	8,321	12%
BSB20115 (REC ID 11) – Certificate II in Business	4,991	7%
SIR30216 (REC ID 11) – Certificate III in Retail	3,809	6%
CUA30415 (REC ID 11) – Certificate III in Live Production and Services	2,571	4%
AHC20116 (REC ID 11) – Certificate II in Agriculture	2,347	3%
MEM10105 (REC ID 11) – Certificate I in Engineering	2,318	3%
SIS20513 (REC ID 11) – Certificate II in Sport Coaching	2,313	3%
ICT30115 (REC ID 11) – Certificate III in Information, Digital Media and Technology	1,672	2%
HLT33115 (REC ID 11) – Certificate III in Health Services Assistance	1,219	2%
AUR20716 (REC ID 11) – Certificate II in Automotive Vocational Preparation	1,159	2%
UEE22011 (REC ID 11) – Certificate II in Electrotechnology (Career Start)	983	1%
ACM20117 (REC ID 11) – Certificate II in Animal Studies	846	1%
CHC30113 (REC ID 11) – Certificate III in Early Childhood Education and Care	788	1%

Source: Based on NCVER VOCSTATS 2020

Table 12: Most popular training package qualifications – Northern Territory, 2019

Training package qualification	Enrolments (2019)	%
CPC20211 (REC ID 11) – Certificate II in Construction Pathways	163	6%
AUR10116 (REC ID 11) – Certificate I in Automotive Vocational Preparation	156	5%
MSM10216 (REC ID 11) – Certificate I in Manufacturing (Pathways)	132	5%
SIT10216 (REC ID 11) – Certificate I in Hospitality	131	5%
BSB30115 (REC ID 11) – Certificate III in Business	124	4%
10432NAT (REC ID 12) – Certificate III in Christian Ministry and Theology	122	4%
SIS20115 (REC ID 11) – Certificate II in Sport and Recreation	113	4%
SIR10116 (REC ID 11) – Certificate I in Retail Services	108	4%
CPC10111 (REC ID 11) – Certificate I in Construction	90	3%

Training package qualification	Enrolments (2019)	%
AHC21016 (REC ID 11) – Certificate II in Conservation and Land Management	76	3%
AHC10116 (REC ID 11) – Certificate I in Conservation and Land Management	73	3%
MEM20413 (REC ID 11) – Certificate II in Engineering Pathways	68	2%
FBP10217 (REC ID 11) – Certificate I in Baking	68	2%
HLT23215 (REC ID 11) – Certificate II in Health Support Services	64	2%
BSB20115 (REC ID 11) – Certificate II in Business	60	2%

Source: Based on NCVER VOCSTATS 2020

Table 13: Most popular training package qualifications – Queensland, 2019

Training package qualification	Enrolments (2019)	%
FSK20113 (REC ID 11) – Certificate II in Skills for Work and Vocational Pathways	17,952	13%
BSB30115 (REC ID 11) – Certificate III in Business	7,198	5%
SIS30315 (REC ID 11) – Certificate III in Fitness	7,108	5%
CPC10111 (REC ID 11) – Certificate I in Construction	6,987	5%
MEM20413 (REC ID 11) – Certificate II in Engineering Pathways	6,945	5%
SIT20316 (REC ID 11) – Certificate II in Hospitality	6,816	5%
SIS20115 (REC ID 11) – Certificate II in Sport and Recreation	6,501	5%
ICT10115 (REC ID 11) – Certificate I in Information, Digital Media and Technology	4,678	3%
BSB20115 (REC ID 11) – Certificate II in Business	4,554	3%
BSB10115 (REC ID 11) – Certificate I in Business	3,485	2%
SIT30616 (REC ID 11) – Certificate III in Hospitality	3,397	2%
ICT20115 (REC ID 11) – Certificate II in Information, Digital Media and Technology	3,153	2%
BSB50215 (REC ID 11) – Diploma of Business	2,977	2%
HLT23215 (REC ID 11) – Certificate II in Health Support Services	2,861	2%
CHC24015 (REC ID 11) – Certificate II in Active Volunteering	2,470	2%

Source: Based on NCVER VOCSTATS 2020

Table 14: Most popular training package qualifications – South Australia, 2019

Training package qualification	Enrolments (2019)	%
CPC20211 (REC ID 11) – Certificate II in Construction Pathways	679	5%
BSB30115 (REC ID 11) – Certificate III in Business	642	5%
CHC30113 (REC ID 11) – Certificate III in Early Childhood Education and Care	634	5%
SIS30315 (REC ID 11) – Certificate III in Fitness	629	5%
AUR20516 (REC ID 11) – Certificate II in Automotive Servicing Technology	546	4%
CPC10111 (REC ID 11) – Certificate I in Construction	527	4%
SIT30616 (REC ID 11) – Certificate III in Hospitality	508	4%
SIT20416 (REC ID 11) – Certificate II in Kitchen Operations	431	3%
UEE22011 (REC ID 11) – Certificate II in Electrotechnology (Career Start)	405	3%
SIT20316 (REC ID 11) – Certificate II in Hospitality	399	3%
SIR30216 (REC ID 11) – Certificate III in Retail	359	3%
CHC33015 (REC ID 11) – Certificate III in Individual Support	345	2%
CPC30211 (REC ID 11) – Certificate III in Carpentry	266	2%
SHB20216 (REC ID 11) – Certificate II in Salon Assistant	262	2%
SIS30115 (REC ID 11) – Certificate III in Sport and Recreation	232	2%

Source: Based on NCVER VOCSTATS 2020

Table 15: Most popular training package qualifications – Tasmania, 2019

Training package qualification	Enrolments (2019)	%
SIT20316 (REC ID 11) – Certificate II in Hospitality	307	9%
CHC22015 (REC ID 11) – Certificate II in Community Services	202	6%
CPC10111 (REC ID 11) – Certificate I in Construction	159	5%
SIT10216 (REC ID 11) – Certificate I in Hospitality	140	4%
SIT20116 (REC ID 11) – Certificate II in Tourism	137	4%
SIR30216 (REC ID 11) – Certificate III in Retail	136	4%
SIT20416 (REC ID 11) – Certificate II in Kitchen Operations	133	4%
CPC20211 (REC ID 11) – Certificate II in Construction Pathways	130	4%
BSB20115 (REC ID 11) – Certificate II in Business	111	3%

Training package qualification	Enrolments (2019)	%
FSK20113 (REC ID 11) – Certificate II in Skills for Work and Vocational Pathways	111	3%
AUR20716 (REC ID 11) – Certificate II in Automotive Vocational Preparation	109	3%
ACM20117 (REC ID 11) – Certificate II in Animal Studies	108	3%
SHB20216 (REC ID 11) – Certificate II in Salon Assistant	103	3%
SHB20116 (REC ID 11) – Certificate II in Retail Cosmetics	100	3%
SIR20216 (REC ID 11) – Certificate II in Retail Services	97	3%

Source: Based on NCVER VOCSTATS 2020

Table 16: Most popular training package qualifications – Victoria

Training package qualification	Enrolments (2019)	%
SIS30115 (REC ID 11) – Certificate III in Sport and Recreation	7,025	10%
22338VIC (REC ID 12) – Certificate II in Building and Construction Pre-apprenticeship	5,781	8%
BSB20115 (REC ID 11) – Certificate II in Business	3,257	5%
SIT20316 (REC ID 11) – Certificate II in Hospitality	2,849	4%
SIT20416 (REC ID 11) – Certificate II in Kitchen Operations	2,828	4%
CHC32015 (REC ID 11) – Certificate III in Community Services	2,459	4%
CUA30915 (REC ID 11) – Certificate III in Music Industry	2,154	3%
AUR20716 (REC ID 11) – Certificate II in Automotive Vocational Preparation	2,025	3%
22470VIC (REC ID 12) – Certificate II in Engineering Studies	1,870	3%
HLT33015 (REC ID 11) – Certificate III in Allied Health Assistance	1,819	3%
CUA31015 (REC ID 11) – Certificate III in Screen and Media	1,762	3%
10297NAT (REC ID 12) – Certificate II in Applied Language	1,496	2%
ICT30115 (REC ID 11) – Certificate III in Information, Digital Media and Technology	1,382	2%
BSB30115 (REC ID 11) – Certificate III in Business	1,372	2%
22280VIC (REC ID 12) – Certificate I in Employment Pathways	1,286	2%

Source: Based on NCVER VOCSTATS 2020

Table 17: Most popular training package qualifications – Western Australia

Training package qualification	Enrolments (2019)	%
BSB20115 (REC ID 11) – Certificate II in Business	7,066	13%
SIS20115 (REC ID 11) – Certificate II in Sport and Recreation	5,330	9%
SIT20316 (REC ID 11) – Certificate II in Hospitality	3,237	6%
SIS20213 (REC ID 11) – Certificate II in Outdoor Recreation	2,695	5%
MEM20413 (REC ID 11) –Certificate II in Engineering Pathways	2,502	4%
CUA20715 (REC ID 11) – Certificate II in Visual Arts	2,372	4%
FSK20113 (REC ID 11) – Certificate II in Skills for Work and Vocational Pathways	2,331	4%
BSB30115 (REC ID 11) – Certificate III in Business	2,299	4%
SIS20513 (REC ID 11) – Certificate II in Sport Coaching	2,009	4%
ICT20115 (REC ID 11) – Certificate II in Information, Digital Media and Technology	1,951	3%
CHC22015 (REC ID 11) –Certificate II in Community Services	1,707	3%
CUA20215 (REC ID 11) – Certificate II in Creative Industries	1,238	2%
AUR20716 (REC ID 11) – Certificate II in Automotive Vocational Preparation	1,176	2%
CUA20615 (REC ID 11) – Certificate II in Music Industry	975	2%
SIS30115 (REC ID 11) – Certificate III in Sport and Recreation	878	2%

Source: Based on NCVER VOCSTATS 2020

Appendix 2: Data limitations

Reporting period

The most recent data available to identify VETDSSS providers during the scoping study was for the 2019 calendar year. We chose 2016 as the start of the reporting period for the scoping study to ensure the project findings were based on current and relevant data.

Identifying VETDSSS providers

To understand the nature and extent of risk within VETDSSS, we analysed our regulatory data in relation to providers of VETDSSS for 2 reasons. Firstly, a systemic risk is a risk that relates to a particular cohort of providers. Secondly, we are able to identify VETDSSS providers within our regulatory database, but not VETDSSS training activity.

We regulate VETDSSS activity in the same way we regulate all VET activity. This is integral to the national consistency of VET that enables students, parents, employers, the community and government to have confidence in the VET that school students participate in while at school. Therefore, whether a training provider is delivering VET to school students, or to the broader public, we are interested in the same information about the provider. As a result, to understand the nature of risk within VETDSSS, as a regulator, we have looked at the risk among the cohort of providers delivering VETDSSS.

VETDSSS providers within ASQA's database are identifiable only through provider self-reporting. Through matching provider registration numbers associated with VETDSSS enrolments in data held by NCVER with our own records, we have been able to reliably identify VETDSSS providers within our regulatory data.

ASQA's regulatory reforms

Data used in this scoping study is historical data for the reporting period from 2016 to 2019. This data reflects ASQA's approach to regulation at the time, in terms of exclusively risk-based monitoring and the selection of clauses against which performance has been assessed.

ASQA commenced implementation of regulatory reforms in response to the *Rapid Review of ASQA's regulatory practices, governance and culture* on 6 April 2021. Our new approach to regulation emphasises the outcomes achieved by providers and this will be reflected in Performance Assessments (formerly audits).

While we have drawn conclusions based on findings of non-compliance against clauses within the *Standards for RTOs 2015* that are input or process-focused, to the extent possible, we have grouped these clauses by themes that closely align to priority outcomes.

Further, some of the clauses identified as a concern in our analysis are still important to quality, but their intent and implications for quality will be captured in the future through the assessment of related clauses that are more outcomes focused.

Participation and provider data

Student numbers throughout this report (for example, to demonstrate the popularity of different qualifications undertaken by school students, or the number of students participating in VETDSSS delivered by different types of providers) are based on the NCVER VOCSTATS VET in Schools collection, matched to ASQA provider data.

NCVER VET in Schools Collection

The NCVER describes its VET in Schools Collection (2020) in the following way:

This collection provides data for VET undertaken by school students as part of their senior secondary certificate of education (SSCE), where the training is nationally recognised or delivered by schools or other training providers.

Data are collected and reported via the senior secondary assessment authority in each state or territory (known as Boards of Studies) to NCVER using the VET Provider Collection Specifications and the [AVETMISS validation software](#).

Information on participation, students, courses and qualifications, and subjects relating to VET in Schools students of all ages is included (NCVER, 2021b).

ASQA understands that NCVER VET in Schools data may not be comparable across states and territories due to differences in definitional and compilation practices used by states and territories to populate some fields.

VOCSTATS data

The number of students reported in the scoping study will differ from NCVER-published VET in Schools figures, due to students attending multiple training providers in a calendar year. Students are counted once at each provider in the NCVER VOCSTATS collection (2020) and in this report, but only once overall in published NCVER VET in Schools figures. For the purpose of this report, a student may be enrolled at more than one provider and, therefore, may be counted twice. This has enabled ASQA to understand student numbers with different types of providers. Individual students may also be counted against more than one training package qualification, which enabled ASQA to understand the most popular qualifications at different qualification levels and in different jurisdictions.

Due to the nature of the data supplied to ASQA by NCVER, student numbers count a unique student per RTO. Program enrolments count each enrolment in a program of study by each student at each RTO.

Data is for training package qualifications, not including accredited qualifications.

Counts of student numbers and enrolments have been rounded to the nearest 5, when the total count is below 50, to protect students from possible identification.

Data cleansing

One provider, which is no longer registered with ASQA, still has a Provider Code and reported non-accredited training under NCVER's Vet in Schools Collection 2016, identifying this provider in the VETDSSS cohort. One student was registered against this provider in 2016, but given the provider was not registered at the time, one student was removed from the 2016 student counts.

VETDSSS outcomes

Stakeholders discussed a lack of data relating to the outcomes and pathways of VETDSSS students.

A recent NCVER report, *VET for secondary school students: post-school employment and further training destinations* (Misko, Chew and Korbel 2020) compares the destinations of VETDSSS students with non-VET secondary school students, 4 to 5 years after finishing school. There is, however, a desire to understand more about the outcomes of VETDSSS and the longer-term benefits for students and employers.

A number of recent VETDSSS reviews include recommendations to address concerns about inadequate data relating to VETDSSS outcomes. This includes the 'Review into vocational and applied learning pathways in senior secondary schooling' (Victoria State Government 2020), the Senior Secondary Pathways Review (Education Council 2020) and the Joyce Review (Commonwealth of Australia 2019).

Joyce (Commonwealth of Australia 2019, p. 94) observed a lack of data about the effectiveness of VETDSSS, noting that the Joyce Review had limited opportunity to assess the outcomes of different approaches to VETDSSS. The report that:

Currently, the NCVER's Graduate Outcomes Survey is not extended to secondary students enrolled in VET. As such, information is not nationally collected about VET students' motivations for enrolling, their satisfaction with the course or their outcomes (Commonwealth of Australia 2019, p. 94).

Brown (2019, p. 1, citing Polidano and Tabasso 2016, p.8) suggests that VETDSSS remains largely 'untracked and geared around preparation for university'.

Tracking VETDSSS, however, requires acute attention to the variation in the arrangements for VETDSSS in each state and territory. Zoellner (2020, p. 20) observed that the focus of major national VETDSSS policies, inquiries and reviews on 'statistical reports on students' journeys through senior secondary years of schooling' is valuable, but can lead to an analytic focus that avoids engaging with underlying policy issues.

The outcomes and efficacy of national VET in Schools policy is traditionally analysed by interrogating combined, anonymised and jurisdictional measures of the outputs of secondary schools operating under the control of provincial authorities. Such analyses tacitly accept that each state and territory has implemented this agenda in a distinctive manner that best suits their perceived local needs and operational realities. Australia's federated approach to schooling means that nationally consistent data that is intended to measure specific characteristics of VET in Schools activity does not account for the jurisdictional contexts of bureaucratic arrangements, historical precedents and political economy (Zoellner 2020, p. 7).

Appendix 3: Non-compliance among VETDSSS providers

Finding: ASQA has found a similar prevalence of serious and critical non-compliance among providers of VET for school students compared to all providers and to those providers that do not deliver VETDSSS.

Audits with findings of non-compliance

Approach

- Using NCVER's VOCSTATS data, ASQA identified providers that delivered VET to secondary school students in the study period from 2016 to 2019.
- ASQA probed its regulatory data about 'providers of VETDSSS' to inform our understanding of risk to the quality of VETDSSS.
- ASQA compared the rate of serious and critical levels of non-compliance found following audits of VETDSSS providers, with the rate for VET providers in general.
- This comparison was done only for audits where the findings were seriously non-compliant and critically non-compliant, as at these levels we understand the non-compliance is more likely to be systemic. Therefore, it is reasonable to assume that when a provider is found non-compliant at these higher levels, the non-compliance is likely to affect the delivery of training and assessment to school students, even if the audit did not directly address this aspect of its training.
- The number of audits reported here may differ from other ASQA reports, as data was accessed at a point in time for use in the scoping study, and additional data from ongoing audits may have subsequently been included.

Finding

- In the 4 years from 2016 to 2019, ASQA found a similar proportion of audits of VETDSSS providers resulted in a finding of serious or critical non-compliance compared to the proportion of audits of providers that do not deliver VETDSSS, and the proportion of audits of all providers that found a similar level of non-compliance (Table 18 and Table 19).
- This finding will reflect ASQA's risk-based approach to regulation between 2016 and 2019 in which only high-risk providers were subject to audit. Nonetheless, in this sample of providers considered to be high-risk, there has not been a noticeable difference in the proportion of audits that resulted in a finding of serious or critical non-compliance.
- In each year from 2016 to 2019, the proportion of audits at which providers were found seriously or critically non-compliant among VETDSSS providers, and the VET sector in general, was within 5 percentage points of each other.
- However, from 2016 to 2019, the increase in the percentage of audits in which providers were found to be seriously or critically non-compliant (an increase from 375 audits, or 30 per cent, to 490 audits, or 37 per cent), found in the VET sector, in general, is not reflected among VETDSSS providers (34 per cent, or 83 audits in 2016 and 35 per cent, or 76 audits, in 2019).
- A comparison of the prevalence of non-compliance is not possible at the state and territory level because of the wide variation in the number of audits undertaken within each state and territory making a comparison invalid.

Table 18: Audits at which the outcome was a finding of critical or serious non-compliance

Year	VETDSSS providers		Non-VETDSSS providers		All providers	
	RO3/RO4	No. audits	RO3/RO4	No. audits	RO3/RO4	No. audits
2016	83	241	292	998	375	1,239
2017	81	231	328	1,011	409	1,242
2018	108	302	388	1,110	496	1,412
2019	76	217	414	1,098	490	1,315

Source: ASQA audits, 2019

Table 19: Percentage of audits of VETDSSS providers resulting in an audit outcome of critical or serious non-compliance

Year	% audits of VETDSSS providers	% audits of non-VETDSSS providers	% audits of all providers
2016	34%	29%	30%
2017	35%	32%	33%
2018	36%	35%	35%
2019	35%	38%	37%

Source: ASQA audits, 2019

Providers found not compliant at audit

Approach

- As explained, it is not possible within ASQA's data to extract audit reports that relate to a provider's training activity delivered to secondary school students. It is possible, however, when matched with VOCSTATS data, to identify providers that deliver VET for school students. ASQA identified providers that delivered VET to secondary school students in the study period from 2016 to 2019.
- ASQA compared the extent of serious and critical non-compliance for VETDSSS providers to providers that do not deliver VETDSSS and to all providers. ASQA only conducted this comparison for findings of serious and critical non-compliance. At these higher levels of non-compliance, we understand that a non-compliance is more likely to be systemic and, therefore, affect the delivery of VET to secondary school students, even if the audit did not directly address this aspect of VETDSSS activities.
- The number of audits reported here may differ from other ASQA reports, as data was accessed at a point in time for use in the scoping study, and additional data from ongoing audits may have subsequently been included.

Finding

- In the 4 years from 2016 to 2019, ASQA found a similar proportion of VETDSSS providers to be seriously or critically non-compliant when compared with the proportion of providers in general (Table 20 and Table 21). A greater difference existed between non-VETDSS providers and VETDSSS providers in 2016, but the difference was still only 5 percentage points, with 39 per cent of providers that do not deliver VETDSS found to be seriously or critically non-compliant, compared to 34 per cent of VETDSSS providers.
- In each of the remaining 3 years of analysis, from 2017 to 2019, the proportion of providers found to be seriously or critically non-compliant across all categories (all providers, VETDSSS providers and non-VETDSSS providers) was within a range of 3 percentage points.
- This finding will reflect ASQA's risk-based approach to regulation to date in which ASQA only selects high-risk providers to audit. Nonetheless, of this sample of providers considered high-risk there has not been a noticeable difference in the proportion of providers found to be seriously or critically non-compliant.
- While there was an increase in the proportion of all providers found to be seriously or critically non-compliant from 30 per cent in 2016 to 37 per cent in 2019, this increase was not evident among either VETDSSS providers or the providers that do not deliver VETDSSS.
- It is not possible to conduct this comparison at the state and territory level because of the wide variation in the number of audits undertaken at the state and territory level.

Table 20: Number of providers audited found to be critically or seriously non-compliant

Year	VETDSSS providers		non-VETDSSS providers		All providers	
	RO3/RO4	No. providers	RO3/RO4	No. providers	RO3/RO4	No. providers
2016	57	158	213	787	270	945
2017	63	162	257	795	320	957
2018	92	232	325	923	417	1,155
2019	67	184	350	870	417	1054

Source: ASQA audits 2019

Table 21: Percentage of providers audited found to be critically or seriously non-compliant

Year	% VETDSSS providers audited	% non-VETDSSS providers audited	% all providers audited
2016	36%	27%	29%
2017	39%	32%	33%
2018	40%	35%	36%
2019	36%	40%	40%

Source: ASQA audits 2019

Appendix 4: Standards of concern

Table 22 identifies the standards of concern among providers of VETDSSS, and for all providers, using the method applied for identifying the standards of concern in ASQA's environmental scanning.

ASQA identifies standards of concern, which are clauses in the *Standards for RTOs 2015* most likely to be associated with non-compliance, by analysing:

- the number of finalised audits that include non-compliance with the clause
- how frequently breaches against the clause are alleged in complaints to ASQA.

In our routine operations, we use information about standards of concern to:

- assess the risk associated with individual providers
- prioritise the direction of our regulatory activities
- inform our understanding of systemic risk
- contribute to the information we share with providers to support continuous improvement in training.

We applied the same method to identify the standards of concern among VETDSSS providers, and compared these to the standards of concern for the VET sector, in general, for the same time period for calendar years from 2016 to 2019.

Table 22: Standards of concern identified for VETDSSS providers and for all providers

2016		2017		2018		2019	
VETDSSS	All	VETDSSS	All	VETDSSS	All	VETDSSS	All
1.8	1.8	1.8	1.8	1.8	1.8	1.8	1.8
5.2	1.1	1.1	1.1	1.1	1.1	1.1	1.3
4.1	4.1	1.4	1.4	1.3	1.3	1.3	1.1
1.3	1.3	1.3	1.3	3.1	3.1	3.1	7.2
1.7	1.4	1.2	4.1	1.2	4.1	1.7	3.1
1.1	5.2	3.1	1.2	4.1	1.2	1.13	1.2
1.4	2.1	1.7	5.2	5.2	5.2	4.1	4.1
3.1	1.7	4.1	3.1	1.13	5.1	1.2	1.13
2.1	3.1	5.2	1.7	1.7	1.13	2.4	1.7
1.2	1.2	2.2	2.1	5.1	1.7	5.2	5.2
5.1	1.13	2.4	2.2	8.2	1.16	3.3	5.1
5.3	5.1	8.2	1.6	1.16	7.1	1.14	1.16
5.4	5.3	8.5	1.13	1.14	8.2	1.16	1.14
2.4	3.3	1.13	5.1	2.4	8.5	2.3	2.4

Source: ASQA 2019

Appendix 5: Sample of audit reports

The following summary outlines the types of findings of non-compliance of VETDSSS providers found in the audit sample. The sample consisted of 11 audits conducted by ASQA since 2015 concerning VETDSSS. The term audit is used to distinguish these historical reports from ASQA's new approach to assessing performance (ASQA, 2021).

The findings do not apply to all providers sampled at audit. Some findings only apply to a single provider, but may impact a large number of students.

Providers' VETDSSS systems and practices were found non-compliant for a range of reasons. Each audit report devotes a significant amount of detail to these areas of non-compliance, in accordance with their importance and complexity. The summary is not comprehensive, it is indicative of the range of findings that have helped identify and understand the 5 common areas of non-compliance.

Assessment and certification

Almost all providers were found non-compliant with clause 1.8. Specifically, out of 11 audits, 10 were found non-compliant in relation to clause 1.8. Of those 10, after rectification processes were outlined by the provider, 5 were subsequently found compliant. Examples of why findings of non-compliance were made include, but are not limited to:

- inadequate instructions, guidance and benchmarks for assessors and students about how to conduct assessment, including recognition of prior learning
- assessment not conducted by a qualified assessor
- inadequate assessments that did not address all performance criteria for a unit of competency across a number of courses
- assessment tools not being provided as examples, contextualised to the activity performed or under development at the time of audit
- unmarked student logbooks and a significant level of automated and standardised assessment decisions
- inaccurate distinction between observable skills and skills that need to be assessed through oral or written questioning
- insufficient demonstration of how learners' individual needs have been identified and addressed
- assessment conducted primarily online and focused on knowledge components of units of competency, without providing an opportunity to assess students in practice as per requirements in the relevant training packages
- assessment tasks inadequately mapped to elements or performance criteria
- assessment tools including items confirmed by assessors as having been observed despite not being observable – for example, assessed through oral questioning that did not include questions for items that could not be observed
- students being allowed to change test answers multiple times until the response was correct.

Amount of training

Most providers were found non-compliant with clauses 1.1 and 1.2. Specifically, 9 providers were found non-compliant in relation to both clauses. After rectification processes were outlined by the providers, 4 were subsequently found compliant in relation to clause 1.1, and 5 were subsequently found compliant in relation to clause 1.2.

Examples of why findings of non-compliance were made include:

- no demonstration of any training and assessment strategies for any of the qualifications sampled at audit
- provider strategies lacking sufficient and reliable/detailed information, including course entry requirements, teacher to student ratios and assessment strategies, amount of training to be provided, number of hours dedicated to undertaking assessment, timing of assessments, mode of delivery (such as face-to-face delivery and whether lectures or workshops), and monitoring and supervision arrangements
- an absence of rationale to support proposed time frames for qualifications on offer
- contradictory or unclear information within assessment strategies, such as proposing that a course be delivered online, but identifying the requirement for workplace learning as a risk to be addressed due to the nature of the course
- no demonstration of amount of training intended to be provided to each learner based on regard for the learner's skills and needs
- training and assessment strategies inconsistent with the requirements of the training package
- course durations varying significantly between what is specified in the training and assessment strategy document and what is reported by partner schools.

Individual student determination and support

See clause 1.2, under amount of training in the previous section.

In relation to clause 1.3, 9 audits were found non-compliant. Of the remaining 2 audits, one was not audited, and one was found compliant. Of the 9 non-compliant findings, after rectification processes were outlined by the provider, 3 were subsequently found compliant.

In relation to clause 1.7, it was only audited on 7 occasions. Of these 7 providers, 4 were found non-compliant with clause 1.7 (with one of those later found compliant) and 3 were found non-compliant.

Reasons for non-compliance include not demonstrating sufficient:

- access to trainers and assessors
- access to educational and support services
- access to appropriate equipment.

Other reasons provided included:

- support needs for students identified, but not provided
- no evidence of strategies, policies and/or procedures in place to ensure students' support needs are identified and support services are provided, and (for third-party arrangements) that such strategies, policies and procedures are disseminated to all third parties or within the provider itself.

Trainers and assessors

See clause 1.3, under individual student determination and support in previous section.

Most providers were found non-compliant with clauses 1.13 and 1.14. In relation to clause 1.13, 7 were found non-compliant. Of the remaining 4 providers, 3 were found compliant with clause 1.13 and one was not audited. In relation to clause 1.14, 7 were found compliant (one was originally non-compliant). The remaining 4 were not audited.

In relation to clause 1.15, most providers were not audited. Specifically, out of 11 audits, 8 providers were not audited, 2 were found compliant and one was found non-compliant.

In relation to clause 1.16, around half of the providers were found non-compliant. Specifically, out of 11 audits, 4 were found non-compliant (of which one was later found compliant), 3 were compliant and one not audited.

In relation to clauses 1.17 and 1.20, most providers were not audited.

The following is a summary of the range of examples given in relation to findings of non-compliance for trainers and assessors:

- The organisation did not provide sufficient evidence to demonstrate that listed trainers and assessors possess vocational competencies to the level required by the relevant units of competency from the training package. For example:
 - industry experience was assessed as not current, based on a trainer's background in science education being used without evidence of how this experience related to the trainer's understanding of current industry practices
 - information, such as consumption of media in the form of podcasts and documentaries lacking complexity, depth and detail to align directly to the specific requirements of the units being delivered and failure to demonstrate that the trainer has maintained, upgraded or developed new skills as required by industry.
- there was no evidence of a system, or practices, that demonstrate oversight of third-party organisations providing training and assessment being delivered by appropriately qualified people
- professional development logbooks do not align with activities undertaken to maintain currency with each unit of competency being delivered
- the provider required trainers and assessors to complete a teacher's log to record activities undertaken for industry currency and/or professional development, but did not require evidence to verify the information recorded
- less than 20 per cent of one provider's sampled trainers and assessors had relevant vocational competencies, current industry skills and professional development for the training products reviewed in the scope of audit, relying significantly on equivalencies instead
- matrix documents recorded teachers' vocational qualifications, but had insufficient records to confirm this.
- matrix documents did not indicate that trainers and assessors had equivalent competence; for example, where teachers describe their knowledge of the units, rather than their vocational experience
- descriptions of vocational experience to demonstrate how teaching experience, rather than actual industry vocational experience, was equivalent to the unit of competency.

Third-party arrangements

The common areas of non-compliance discussed previously in relation to the sample of audit reports include examples of third-party arrangements driving non-compliance and/or impacting a large number of students.

Appendix 6: Roundtable and interview participants

ASQA conducted a roundtable with government and education sector stakeholders in each jurisdiction. Organisations represented at these roundtables are listed in Table 23. ASQA also conducted interviews with 28 different stakeholder organisations (Table 24).

Table 23: Organisations represented at roundtables held in each jurisdiction

Jurisdiction	Organisations
Tasmania 4 November 2019	Department of Education
	Department of State Growth
	Office of Tasmanian Assessment, Standards and Certification
	Tasmanian Catholic Education Office
	Independent Schools Tasmania
New South Wales 6 November 2019	Department of Education
	NSW Skills Board
	NSW Education Standards Authority
	Catholic Schools NSW
	Association of Independent Schools NSW
Western Australia 11 November 2019	Department of Education
	Department of Training and Workforce Development
	Training Accreditation Council
	Schools Curriculum and Standards Authority
	Catholic Education WA
	Association of Independent Schools WA
Northern Territory 13 November 2019	Department of Education
	Department of Trade, Business and Innovation
	Catholic Education NT

Jurisdiction	Organisations
South Australia	Department of Education
18 November 2019	Department for Innovation and Skills
	Training and Skills Commission SA
	SA Certificate of Education Board
	Catholic Education SA
	Association of Independent Schools SA
Queensland	Department of Education
21 November 2019	Department of Employment, Small Business and Training
	Queensland Curriculum and Assessment Authority
	Queensland Catholic Education Commission
	Independent Schools Queensland
Australian Government	Department of Education and Training
26 November 2019	Department of Employment, Skills, Small and Family Business
	National Catholic Education Commission
	Association of Independent Schools
	Australian Curriculum, Assessment and Reporting Authority
Australian Capital Territory	ACT Education Directorate
27 November 2019	Chief Minister, Treasury and Economic Development Directorate
	ACT Board of Senior Secondary Studies
	Association of Independent Schools ACT
Victoria	Department of Education and Training
28 November 2019	Victorian Registration and Qualifications Authority
	Victorian Curriculum and Assessment Authority
	Catholic Education Melbourne
	Independent Schools Victoria

Source: ASQA 2019

Table 24: Organisations represented in interviews to inform the scoping study

Stakeholder Group		
Skills Service Organisations	Artibus	4 November 2019
	Skills IQ	7 November 2019
	Skills for Australia (PWC Australia)	21 November 2019
	Australian Industry Standards Ltd	28 November 2019
	Skills Impact	28 November 2019
	Innovation and Business Skills Australia	6 December 2019
VET sector peak bodies	Community Colleges Australia	7 November 2019
	Enterprise Registered Training Organisation Association	19 November 2019
	National Australian Apprenticeship Association	19 November 2019
	Career Development Association of Australia	20 November 2019
	TAFE Directors Australia	20 November 2019
	English Australia	3 December 2019
	National Apprentice Employment Network	6 December 2019
	Independent Tertiary Education Council Australia	9 December 2019
Other VET regulators	TAC-WA	11 November 2019
	VRQA	28 November 2019
Peak industry representative body	Australian Chamber of Commerce and Industry	25 November 2019
	Australian Industry Group	29 November 2019
	Business Council of Australia	6 December 2019
	Council of Small Business Organisations Australia	20 November 2019
Employee peak bodies	ACTU, AEU, ETU, AMWU, ANMF, CFMEU	29 November 2019
	AEU	29 November 2019
Government department	Department of Education and Training (Vic)	13 December 2019
Other stakeholders	Foundation for Young Australians	29 November 2019

Source: ASQA 2019

Appendix 7: Stakeholder consultation themes

VETDSSS has multiple purposes

It was broadly recognised by stakeholders that VET is incorporated into the senior school curriculum for multiple purposes, including the development of generic work skills, enhancing student engagement in school and the development of vocational skillsets. Some stakeholders stressed the importance of preparing students for the workforce, while a minority view held that vocational education should not be delivered through secondary schools.

The emphasis placed on different aspects of the purpose of VETDSSS varied between jurisdictions and stakeholder groups. Stakeholders external to the secondary schooling system and with more direct ties to industry and employers, often noted that preparing students for employment was an important, or primary, purpose of VET delivered to secondary school students.

Positive leadership

There was a broad consensus among state and territory government departments that the success of VETDSSS programs was often dependent on the leadership of local school principals, teachers and providers.

Dedicated student support and VET coordination

There was a consensus across states and territories about the importance of quality career guidance and advice to assist students in navigating VETDSSS options that would lead to work or further education and training post-school.

Several stakeholders noted that the absence of informed career guidance can lead students to enrol in courses that are not deemed useful by potential employers, and/or cannot be completed within 2 years of senior secondary schooling. It was a widely held view among stakeholders that career guidance could be strengthened.

Senior Secondary Certificate of Education (SSCE) credit arrangements influence VETDSSS

Stakeholders from the education and skills sectors expressed a view that VETDSSS enrolments were influenced by the SSCE credit policies of particular jurisdictions.

Discussions touched on how the different arrangements for granting credit for VET within SSCEs can disadvantage some students. In some cases, these differing arrangements can penalise students moving to different schools, or interstate, midway through their senior secondary years.

Provider groups commented on how the motivation to obtain credit towards SSCEs influences enrolments in some qualifications, with some students believed to be enrolling in these qualifications primarily to gain credit towards their SSCE.

The challenges of dual qualifications for teacher-trainers

During roundtable discussions, there was a consensus that providers and schools faced difficulties in attracting and retaining dual-qualified teacher-trainers. These are professionals with teaching qualifications and registration, training and assessment qualifications, equivalent vocational skills and industry currency. A shortage of professionals meeting and being able to maintain these dual professional qualifications and registration has a corresponding impact on the quality of VETDSSS course delivery. Some jurisdictions have developed workforce strategies to address the challenges of retaining experienced teacher-trainers.

School facilities may not be consistent with industry standards

A number of industry stakeholders noted that schools do not necessarily have access to industry-standard facilities for training and assessment. This shortcoming was attributed to a range of factors including the cost of training facilities. The pooling of resources and sharing of costs among schools was cited as one method of overcoming this problem.

A desire to improve the quality of work placements

Employer representatives and VET sector peak bodies expressed concerns about the negative consequences for VETDSSS caused by poor-quality work placements. One VET sector peak body noted the confusion caused by a lack of clarity about roles and responsibilities in monitoring student progress among providers, employers and schools. Some stakeholders identified the potential risk this creates to student outcomes and wellbeing.

Industry engagement is crucial

Stakeholders expressed a range of views about the role of industry engagement in the quality of outcomes of VETDSSS. Some stakeholders did not view VETDSSS as an effective producer of 'job-ready' employees with one employee representative noting that students did not receive sufficient work experience during their secondary schooling. But another national stakeholder expressed a different view, attributing problems with secondary school graduate job-readiness to a failure on the part of employers to properly induct new staff.

Stakeholders unanimously agreed that effective networking between providers and schools was an important factor contributing to the quality of VETDSSS. Education and skills stakeholders noted that these partnerships help schools understand the skill requirements of local employers and target the range of VET offerings to the needs of local industry. Some stakeholders recognised that such partnerships provided opportunities for teacher-trainers to maintain their industry currency. Industry stakeholders noted this engagement helps inform the design of qualifications and training to provide workplace skills and job readiness.

Risks in third-party arrangements

Under the *Standards for RTOs 2015*, providers can deliver elements of training and assessment through third parties. One model used by a number of schools, and popular in some states and territories for delivering VET to school students, is for schools to delivery training and assessment under the auspices of a registered provider.

Some stakeholders acknowledged that this model could be attractive for schools because it can reduce the administrative costs associated with being a registered provider for the school. This practice can lead to unintended consequences arising from providers' unfamiliarity with the needs of school-aged students and timelines required for achieving student outcomes.

Some stakeholders in departments of education noted that schools are challenged by the market-based nature of VET. The process of assessing quality and finding an appropriate provider can be a resource-intensive and risky process year to year. Other education stakeholders believe the prioritisation of profits for providers can come at the expense of students' needs. Examples were given where providers expanded rapidly to offer a broad scope of courses without the required number of quality trainers with appropriate VET experience and industry currency.

Where there is inappropriate oversight of training and assessment, practices may not be compliant with the *Standards for RTOs 2015*. This contributes to unreliable quality or consistency, and distrust in the teaching quality and assessment practices of VETDSSS.

Concerns about non-compliant assessment

Some stakeholders spoke about cases in which school students have been required to repeat VET assessments because other providers distrust the quality of VETDSSS, or where students who are not properly competent have, nonetheless, been certified. Various employer representative bodies expressed doubts about whether it is possible to accommodate the amount of training required for Certificate III courses and above within the typical, 2-year senior schooling timetable, to prepare students for assessment. One employer representative noted a further complication when schools include additional learning and assessment criteria to meet SSCE requirements, which has the potential to compromise VET assessment.

Concerns about the prevalence of short duration of training

The pressure of squeezing the amount of training required to gain particular qualifications into a 2-year school timetable is a challenge for VETDSSS. Industry stakeholders identified the practice of compressing VET courses into shorter periods, with an associated reduction in time for practical training and work placements, as common and problematic.

Concerns were also expressed about the quality of higher-level qualifications, such as Certificate IV or diploma-level qualifications, within VETDSSS programs. Some stakeholders consider such qualifications to normally require at least 150 nominal hours of training, which is substantially more than the number of hours available over 2 years of secondary school.

In addition to timetabling issues contributing to short duration training, some education and skills stakeholders identified that qualifications are being achieved through online VET at a significantly faster completion rate than face-to-face learning. These stakeholders expressed concern that this could lead to less retention of knowledge and skills and, therefore, lower quality outcomes. Provider groups also conveyed their observations that providers delivering primarily through third-party arrangements tend to deliver predominantly online, sometimes with limited observation of students or monitoring of teachers.

Concerns about the suitability of some qualifications for school students

Stakeholders considered whether some VET qualifications are inappropriate for school students to undertake, with divergent opinions expressed. Industry stakeholders and providers tended to regard this as an issue that is pervasive and problematic, with students undertaking qualifications unsuitable for school students. Other stakeholders, however, focused less on this issue. This difference may be the result, in part, of what different stakeholders see as the purpose of VETDSSS.

Intersection with industrial relations

Some stakeholders identified the unintended consequences of industrial relations law on VETDSSS. These include employer reluctance to hire school graduates with VET qualifications where industrial relations laws require payment of higher wages. In the case of young people who have commenced or completed a VET qualification during their school years, employers may not have access to the financial incentives for hiring that apply for less-qualified or less-experienced workers.

Negative perceptions of VETDSSS as an inferior study option

A number of jurisdictions noted that VETDSSS is perceived in some quarters as an inferior study option in senior secondary school. Stakeholders highlighted how this can lead to instances where school staff direct low-achieving students towards VETDSSS, and discourage higher-achieving students from pursuing vocational pathways.

The impacts of funding arrangements on quality

Stakeholder groups raised concerns about school funding arrangements that served to constrain VETDSSS. Noting that while funding policies differed among the states and territories, common issues discussed were:

- schools may not prioritise VET, or may not have sufficient knowledge of VET to make adequate budget allocations
- students may not be supported to cover training and equipment costs that are prohibitively expensive for them or their families. This results in students either missing out on training or undertaking alternative, ill-suited training
- insufficient funding for building and/or maintaining industry-standard facilities

- insufficient funding for dedicated support staff to manage industry and employer engagement, and regulatory compliance in schools
- targeted funding programs have, at times, emphasised facilities over ongoing funding needs, such as staff and program delivery costs
- targeted funding programs may have unintended consequences by promoting courses and training levels that are inappropriate for students or the needs of local industry.

Increasing consistency in VETDSSS

Participants discussed whether there was any potential for greater consistency in different aspects of the delivery of VET to school students. While stakeholders acknowledged the practical difficulties in achieving this aim they, nonetheless, made a number of suggestions where greater national consistency might be achieved. These included:

- providing information to schools that supports understanding of policy, funding and regulatory arrangements relating to VETDSSS
- developing nationally consistent guidelines for vetting all third-party agreements between providers and schools
- using standardised third-party agreements
- providing information and support for employers to improve availability and quality of work placements
- promoting a cohesive and coherent strategy for industry engagement
- using approved provider lists that identify providers suitable for the delivery of VET to secondary school students
- creating professional development programs for teachers, trainers and VET coordinators.

Stakeholders suggested that the National Careers Institute could promote a greater degree of inter-jurisdictional consistency by helping school guidance counsellors and teachers to:

- better understand VET pathways and future career options
- provide better advice to students
- make more informed assessments of the appropriateness of a proposed program of study for individual students.

Stakeholders also suggested that ASQA could improve the regulation of VETDSSS by:

- providing professional development for principals, teachers and VET coordinators to improve understanding of their obligations under the *Standards for RTOs 2015*
- ensuring greater regulatory consistency between school-RTOs and other providers
- providing examples and case studies of good practice
- better explaining outcomes of the audits undertaken in school-RTOs, or where third-party arrangements are in place
- provision of more information about providers that are delivering VET to schools or to school systems
- identifying unique conditions to determine the suitability of a provider to deliver VET to school students.