



Strategic review of online learning in the VET sector

Snapshot

Introduction

The Strategic Review of Online Learning in the VET sector was undertaken to address a regulatory risk identified in ASQA's Regulatory Strategy [2020-22](#) and in the 2021-22 Regulatory Risk Priorities. We have undertaken this review to analyse the opportunities and risks of online learning and to identify the nature of our regulatory response. It has taken place at a time of growing importance of the sector's response to COVID-19 pandemic, as well as digital technologies for innovative delivery of education services, and a skilled labour force identified as central to this growth (Productivity Commission [2022](#)).

The coronavirus (COVID-19) pandemic has accelerated the sector-wide expansion of online delivery. In general, prior to the COVID-19 pandemic, online learning was one mode of delivery used in the Australian VET sector but in a limited way. In response to the pandemic, most providers made significant changes to increase their use of this mode of delivery and many invested heavily to ensure quality continued. Similar changes also took place in the tertiary sector (TEQSA 2021).

While there is no one-size-fits all approach adopted by providers to online delivery, the conditions brought by the COVID-19 pandemic forced a rethink of assumptions for many about what could be delivered online. Notably, the early 2021 survey ASQA undertook of providers' shift online found that 62% of those who shifted in response to COVID-19 were likely to employ more blended learning in the future (ASQA 2021).

Providers of English Language Intensive Courses for Overseas Students (ELICOS) reported transitioning to fully online (31.4%) and blended (35.8%) modes of delivery. Of all the survey respondents, nearly 30% of providers delivering to international onshore students moved to fully online, and nearly 90% moved to offering some training or assessment online. Providers delivering to international offshore students had over 25% move to fully online and over 80% move at least some training or assessment online.

The shift was particularly significant for Education Services for Overseas Students (ESOS) providers who pivoted from a position of only being able to offer a small portion of training and assessment online (or none, in the case of those delivering ELICOS), to being able to temporarily offer courses fully online.

The legislative and regulatory frameworks governing the Australian international education sector have a primary focus on face-to-face delivery in Australia. The existing ESOS framework requirements on online and overseas study are Standard 8 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code), which explicitly limits online study by international student visa holders to no more than one third of their course, and at least one face-to-face unit in each study period. The ELICOS Standards 2018 (ELICOS Standards) Standard P1 requires a minimum of 20 hours of face-to-face scheduled course contact per week because of the importance of cultural immersion and student welfare in achieving the learning outcomes.

ASQA and TEQSA announced flexibility in regulatory arrangements and requirements to enable providers to support students to study online either in Australia or offshore. As long as the student remained enrolled with their provider, and the assessment requirements of the course allowed it, the location of the student and the mode of delivery would not prevent the student from attaining an Australian qualification.



Methodology

The review engaged with students through focus groups, implemented a provider survey of the VET sector's use, experience, and perceptions of online learning jointly administered with the National Centre for Vocational Education Research (NCVER), and consulted ASQA staff through a workshop and focus group series. ASQA also held a webinar series and published an insights paper series that can be found on ASQA's website [here](#).

ASQA also commissioned two research pieces to explore both the constraints on, and the opportunities of, delivering two qualifications from the most-impacted training packages delivered partly online. These qualifications are:

- CHC33015 – Certificate III in Individual Support
- SIT30816 – Certificate III in Commercial Cookery

The report features a small number of vignettes from this research to showcase short scenarios that illustrate what may be possible for online delivery. The research can be found [here](#).

Findings

The review found that whilst quality VET can be delivered online, taking into consideration the requirements of the training product, the student cohort, the skills of the trainer and assessor, and the tools, technologies, and processes for delivering online, the challenges, opportunities and risks vary depending on those factors. There is no single issue or feature that is an indicator of greater or lesser risk to quality.

The rapid shift online by many providers during the COVID-19 pandemic, however meant that some had limited or no experience in that mode of delivery. This has increased the prospect of some providers operating in the market with immature risk assessment and self-assurance systems in place to assure quality outcomes for online or blended delivery.

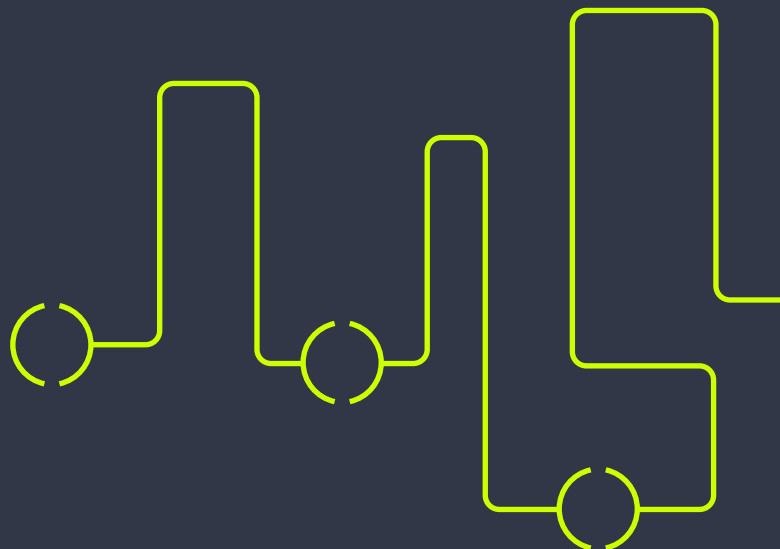
Risks for online delivery for students include:

- not ensuring they are appropriately prepared for, and supported to, undertake learning online, and not sufficiently taking into account the student's literacy, language, numeracy and digital (LLND) skills
- not taking into account the student's learning style
- not being equipped to meet the delivery mode's technological requirements for participation
- students not being informed of, or sufficiently understanding, the mode of delivery being offered.

Risk related to training and assessment include:

- insufficient digital literacy skills of trainers and assessors
- training and assessment that it is not suitable and/or is not being delivered effectively online
- training and assessment not designed or adapted for online delivery
- online delivery does not meet the requirements of the training product
- insufficient checks and balances in place to assess a learner's competency or verify the authenticity of the learner.

The review also found that many students prefer the flexibility of blended learning, and this expansion and preference bring opportunities for providers to expand their offerings and provide students with more choice across the market.





Regulation

The review identified the following provider accountabilities and relevant clauses of the Standards for regulatory focus and assurance of quality outcomes:

- giving accurate and accessible information about mode/s of delivery to prospective students, particularly, that the information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and accurately represents the services it provides (Standard 4.1 (a)) in relation to blended learning or learning fully online
- ensuring that all trainers undertake professional development in the fields of knowledge and practice of vocational training, learning and assessment (where appropriate, taking account of the digital literacy skills of trainers and assessors) (Clause 1.16) and support RTOs to self-assure their practice in complying with this standard
- ensuring each learner is properly informed and protected when considering and undertaking blended learning or learning fully online (Clause 1.2, 1.3, 5.1 and 5.2), including, where appropriate, the suitability of any proposed use of asynchronous (self-paced) learning.

ASQA has committed to five actions as a planned program of work to address risk, and support providers to self-assure against the required Standards and to continuously improve the quality of VET delivered online including through provider education and ongoing proportionate monitoring of the risks of online delivery. These actions support ASQA's purpose to ensure quality VET 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.

ASQA has also identified policy considerations to be raised through our engagement with the Department of Education and Department of Employment and Workplace Relations.

Actions arising from the review

Examination of identified risks and key clauses of the Standards will inform ASQA's regulatory approach and support quality outcomes through the following actions.

Action 1.

Through our integrated, planned and risk-based approach to regulation ASQA will undertake performance monitoring of a sample of providers delivering products of concern online, including a focus on specific provider responsibilities under the Standards. We will report on the outcomes of these regulatory activities including sharing insights with the sector.

Action 2.

ASQA will strengthen existing education products and develop new guidance to support providers to self-assure their operations and continuously improve performance against the Standards in the context of risks of online delivery. ASQA will test these products with stakeholders to ensure they're fit for purpose and deliver on intended outcomes.

Action 3.

ASQA will develop guidance for its quality assessors to support consistent application of the Standards and ensure assessment practices keep pace with innovation in relation to online delivery.

Action 4.

Ordinarily, English language qualifications delivered under the ESOS Act cannot be delivered fully online, because of the importance of cultural immersion in achieving the learning outcomes. Explicit allowance for fully online delivery of these qualifications was made by ASQA and TEQSA as a temporary measure in response to COVID. Support for ELICOS providers and a planned approach to return to compliance with the ELICOS Standards should be considered in consultation with stakeholders.

Action 5.

ASQA will consider the risks associated with delivering online learning and the self-assurance systems in place to assure quality outcomes for online or blended delivery when considering the overall level of risk for an applicant or registered provider, and the broad range of regulatory approaches to respond to the relevant risks identified.

Consistent with ASQA's Regulatory Operating Model (ASQA 2021, p.9), these actions will involve actively engaging with stakeholders and the regulated community to work collaboratively to enhance quality VET delivered online.

Policy considerations

Policy consideration 1.

ESOS Agencies should monitor the data sources available to understand achievement of learning outcomes, student support and wellbeing required of ELICOS providers. This will provide greater assurance of market maturity and inform any future policy settings.

Policy consideration 2.

The Department of Education to consider ways in which the outcomes intended by requirements set out in Standard 8 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code) and the ELICOS Standards can be safeguarded whilst not constraining expansion of English language training by ELICOS providers.

Policy consideration 3.

In developing policy in relation to the applicable Standards, The Department of Employment and Workplace Relations should consider provider responsibilities including trainers and assessors having the appropriate capability to conduct training and assessment online; ensuring the authenticity of online assessment; and appropriate training and wellbeing supports for students studying online. The review of Standards for Registered Training Organisations currently under development by DEWR is an opportunity to support quality assurance of training and assessment delivered online.

Policy consideration 4.

The current review of the Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS) led by the National Centre for Vocational Education Research (NCVER) could provide improved data and definitions to capture the diversity and characteristics of the online market. This would assist ASQA to better target our regulatory activities to address risk and support providers to deliver quality training and assessment online. The availability of up-to-date information on public websites linked to the AVETMISS data, namely My Skills and training.gov.au, is also critical for students, funding authorities and employers to make informed choices about training.

