



Australian Government
Australian Skills Quality Authority

REPORT

Training for early childhood education and care in Australia



Letter of transmittal

The Hon Simon Birmingham MP
Assistant Minister for Education
Parliament House
Canberra ACT 2600

Dear Minister

We are pleased to provide the report on the Australian Skills Quality Authority's (ASQA's) national strategic review of training for early childhood education and care.

This strategic review was initiated by ASQA Commissioners in response to concerns raised by the Productivity Commission in its 2011 research report *Early Childhood Development Workforce* about the quality of vocational education and training (VET) and assessment being provided.

The findings of this review are similar to those of ASQA's 2013 review of aged and community care training and in many instances the same recommendations apply here.

This national strategic review relied on audits of registered training organisations, surveys of registered training organisations and stakeholder feedback for its findings. The review confirmed the concerns raised by the Productivity Commission. The results have indicated that most registered training organisations have difficulty complying with assessment requirements; training courses are delivered in too short a time; and learning and assessment in a structured workplace environment is not done well.

This strategic review was guided by a management committee drawn from key stakeholders from industry, employers, unions and government and chaired by ASQA's Chief Commissioner.

ASQA's Commissioners are very grateful for the invaluable contribution of the management committee—both collectively and individually—and also for the active support and contribution from other stakeholders.

Key recommendations of this review address the need for:

- training packages to include minimum benchmarks around the amount of training required for units of competency and VET qualifications
- ASQA to obtain intelligence from early childhood and care providers about the quality of training and assessment
- the quality of assessment to improve
- greater clarity in training packages in relation to assessment evidence
- adequate provision of training and assessment in an actual or simulated workplace, and
- trainers and assessors to gain and maintain vocational competence.

ASQA considers the implementation of the strategic review's recommendations will strengthen considerably the quality of early childhood education and care training and assessment provided to learners. This is particularly important not only for the integrity of the VET sector but also because there is a projected national shortage of early childhood education and care workers.

We commend this report and its recommendations to you.

Yours sincerely



Chris Robinson
Chief Commissioner



Dianne Orr
Deputy Chief Commissioner



Michael Lavarch
Commissioner

Key findings

- The *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care* are critical qualifications for early childhood education and care workers under the sector requirements of the National Quality Framework for Early Childhood Education and Care.
- Most registered training organisations have difficulty complying with assessment requirements.
- Following time to rectify areas where they were not compliant, most registered training organisations became compliant with the national standards for registered training organisations.
- Training courses are often being delivered in too short a time to enable the development of sufficient skills and knowledge and for valid assessment decisions to be made.
- Learning and assessment in a structured workplace environment is not being done well by many registered training organisations delivering early childhood education and care.

Contents

Letter of transmittal	i	
Executive summary	1	
Recommendations	4	
Conclusion.....	9	
Chapter 1	Introduction	9
1.1	Background	10
1.2	Changes to the regulatory framework commencing in 2015.....	11
1.3	ASQA strategic reviews.....	11
1.4	Management committee and methodology	13
1.5	Structure of this report.....	16
Chapter 2	Developments in the early childhood education and care industry	17
2.1	The nature of the industry	17
2.2	The nature of the existing workforce	20
2.3	The changing workforce.....	22
2.4	Future workforce needs.....	23
Chapter 3	The scale and nature of training in the early childhood education and care sector	24
3.1	Number of RTOs registered to provide early childhood education and care training	24
3.2	Characteristics of early childhood education and care training provision	26
3.3	The national training effort in early childhood education and care	26
3.4	Profile of surveyed RTOs	31
3.6	Funding.....	42
Chapter 4	Stakeholder perspectives	44
4.1	Stakeholder consultations	44
4.2	Complaints	54
Chapter 5	Quality of early childhood education and care training and assessment	56
5.1	Overview of the standards.....	56
5.2	Overall levels of compliance and non-compliance with the standards	57
5.3	Training and assessment strategies—Standard 15.2	62
5.4	Resources required—Standard 15.3.....	68
5.5	The adequacy of trainers—Standard 15.4	70
5.6	Assessment—Standard 15.5.....	72
5.7	Information to clients—Standard 16.3.....	76
5.8	Engagement with industry—Standard 16.4.....	77
5.9	Support services—Standard 16.5	79
5.10	Monitoring of services provided on the RTO's behalf—Standard 17.3.....	80
5.11	Issuance of qualifications or statements of attainment—Standard 23.1	81
5.14	Ethical and accurate marketing—Standard 24.1	83

5.15	Transition to training packages—Standard 25.1	83
Chapter 6	Findings.....	85
	Concluding comment	93
	List of acronyms	94
	Glossary	95
	References	100
	Appendix A: List of Steering Committee representatives	102
	Appendix B: Review methodology	103
	Appendix C: Volume of learning: an explanation	109
	Appendix D: Excerpts from the <i>Standards for NVR Registered Training Organisations</i> <i>2012</i>	111
	Appendix E: Definitions—principles of assessment and rules of evidence.....	113
	Appendix F: Reconsideration of a decision by ASQA (Fact sheet).....	115

List of tables

Table 1: Number of approved child care services by type and state and territory 2012–13*	18
Table 2: Registered care providers and registered care providers with Child Care Benefit claims, by state and territory, 2012–2013*	19
Table 3: Size of early childhood education and care workforce in the national Early Childhood Education and Care Workforce Census*	20
Table 4: RTOs registered to deliver children's services and/or early childhood education and care training at the certificate III and diploma level, by regulator	24
Table 5: Number of enrolments in the Certificate III in Children's Services and the Certificate III in Early Childhood Education and Care, combined, from 2010 – 2013	27
Table 6: Full-time or part-time mode, certificate III, 2010 – 2013	27
Table 7: Total number of enrolments, diplomas*, by year, 2010 – 2013	29
Table 8: Number of enrolments by full-time or part-time mode, diploma, 2010-2013	29
Table 9: Total number of enrolments by qualifications	32
Table 10: Number of RTOs with student enrolments in certificate III or diploma	33
Table 11: Summary of course duration, certificate III	37
Table 12: Variation of course duration in weeks, certificate III	38
Table 13: Variation of course duration in hours, certificate III*	39
Table 14: Variation of duration of classroom and workplace hours, certificate III*	40
Table 15: Variation of course duration in hours, diploma*	41
Table 16: Variation of duration of classroom and workplace hours, diploma*	42
Table 17: Complaints received across the early childhood education and care sector, 1 July 2013 – 30 June 2014	55
Table 18: Proportion of RTOs audited, by state, January 2013 – May 2014.....	58
Table 19: Assessment requirements	64
Table 20: Delivery modes used by the 30 RTOs specifically audited for this review	65
Table 21: Summary of issues related to training and assessment among the 30 RTOs specifically audited for this review	67
Table 22: Proportion of the RTOs specifically audited for this review that were not compliant against each aspect of Standard 15.4*at initial audit	71

List of figures

Figure 1: Regulators of Australia's RTOs.....	10
Figure 2: Early childhood development sector.....	17
Figure 3: Share of early childhood education and care workforce with and without an early childhood education and care-related qualification*, 2013.....	22
Figure 4: ASQA-regulated RTOs offering early childhood education and care qualifications by state and territory location of head office, December 2014	25
Figure 5: ASQA-registered RTOs by training organisation type	26
Figure 6: Proportion of students enrolled in certificate III level children's services/early childhood education and care qualifications by main language spoken at home, calendar years 2010 – 2013	28
Figure 7: Certificate III in Children's Services Student Completions calendar years 2008 – 2012*†	28
Figure 8: Proportion of students enrolled in diploma level children's services/early childhood education and care qualifications by main language spoken at home	30
Figure 9: Diploma-level children's services/early childhood education and care qualifications completed, by calendar year, 2008–2012	30
Figure 10: Proportion of surveyed RTOs in each state or territory	31
Figure 11: Delivery mode used, by qualification	35
Figure 12: Proportion of students* enrolled by tuition type	43
Figure 13: RTO traineeship funding contracts by state or territory	43
Figure 14: Issues most frequently raised in complaints about training providers, 1 July 2013 – 30 June 2014	54
Figure 15: Summary of compliance outcomes—at initial audit and following rectification period—for 77 audits conducted during this review.....	58
Figure 16: Compliance demonstrated against relevant standards, at the initial audit and after a 20-day rectification period, by RTOs (77) audited as part of this review	61
Figure 17: Compliance demonstrated against Standard 15* for by RTOs (77) audited as part of this review	62

Executive summary

The Australian Skills Quality Authority (ASQA) commenced operations as the national regulator for Australia's vocational education and training (VET) sector on 1 July 2011.

ASQA's review into early childhood education and care training was prompted by the Productivity Commission research report, *Early Childhood Development Workforce* (Productivity Commission 2011), and further informed by the subsequent inquiry report, *Child Care and Early Childhood Learning* (Productivity Commission 2014).

Early childhood education and care services have been the subject of significant national reforms over the past four years. Almost all children in Australia are exposed to some form of early childhood education and care services prior to starting formal schooling. The Australian Government is the largest funder of the sector, with outlays exceeding \$5 billion a year and growing. The quality of training undertaken by those who deliver such services has significant implications for the families and children who utilise these services, as well as for the wider economy.

Of particular concern to ASQA were the Productivity Commission's findings that 'the quality of early childhood education and care training delivered by registered training organisations (RTOs) is highly variable' and that 'concerns about poor training from RTOs are widespread' (2011a, p. 203). A number of key issues undermining the quality of the training in the early childhood education and care workforce were identified in the *Early Childhood Development Workforce* report (2011a). The issues identified included:

- the quality and variability of training provided to prepare early childhood education and care workers
- the different lengths of training provided for the same qualification by registered training organisations
- whether sufficient practical on-the-job training was being provided
- whether trainers and assessors possessed current industry experience, and
- the variable nature of assessment practices, including recognition of prior learning (RPL).

ASQA responded to the release of the *Early Childhood Development Workforce* report by taking a number of actions, both to increase regulatory scrutiny of early childhood education and care training, and to investigate the quality of RTOs' delivery of this training:

- First, ASQA agreed to **prioritise the regulatory scrutiny of early childhood education and care training**. From the end of 2013, any ASQA audit of an RTO that offered early childhood education and care training automatically included that training as part of the audit. (Audits conducted by ASQA usually consider a sample of the training delivery, rather than all qualifications offered by the RTO). This priority has meant that from 2013 early childhood education and care training was scrutinised in ASQA audits of RTOs delivering this training.
- Second, in February 2014, ASQA completed **a survey of ASQA-regulated RTOs offering the certificate III or diploma in children's services and early childhood education and care**. The survey sought to gather new information about how RTOs are providing early childhood education and care training.
- Third, following discussions with the Honourable Ian Macfarlane, the then Australian Government Minister for Industry, ASQA Commissioners decided to **establish this national strategic review of early childhood education and care training**. The review was established by utilising the powers conferred on ASQA under the *National Vocational Education and Training Regulator Act*

2011. The Act allows ASQA to conduct national strategic reviews of training quality in any areas of concern within the vocational education and training sector.

The national strategic review commenced in January 2014. The review was guided by a management committee comprising ASQA's Chief Commissioner and representatives from the Australian Government Departments of Industry and Education, the Australian Children's Education and Care Quality Authority, the Community Services and Health Industry Skills Council, Early Childhood Australia, Australian Community Children's Services, Family Day Care Australia, United Voice, the Victorian Registration and Qualifications Authority and the Western Australian Department of Education Services.

In total, the results of 77 audits conducted by ASQA of registered training organisations informed the review's findings. This represents almost 30% of the RTOs delivering early childhood learning and child care. Forty-seven of the audits were undertaken by ASQA as part of its ongoing regulatory work and 30 were initiated specifically for the review.

The findings of this strategic review into early childhood education and care training were similar to the findings of ASQA's aged and community care strategic review of 2013. One major concern identified through this strategic review (and also through the 2013 aged and community care strategic industry review) is that many RTOs are delivering training in considerably less time than recommended in the Australian Qualifications Framework (AQF). Excessively shortened courses may lead to poor quality outcomes, as often they cannot deliver the rigour and depth of training and competency required by industry (Halliday-Wynes and Misko 2013). There is likely to be a causal link between short course delivery and poor quality training and assessment. The AQF details the period of time a 'typical' student should spend to gain and demonstrate the competencies for a qualification.

This review has found that a significant proportion—just over 70%—of the delivery of the Certificate III in Child Care was occurring in programs of less than one year's duration, even though the AQF guidelines stipulate one to two years as the appropriate benchmark for a certificate III. (ASQA made similar findings in relation to aged and community care in 2013). A particularly worrying finding was that 20% of the delivery is occurring in programs of 26 weeks or less. The AQF benchmark equates to a volume of learning requirement of at least 1200 hours of delivery for a certificate III—whereas almost three-quarters of the delivery of Certificate III in Child Care was found to be 750 hours or less.

The other major finding is that too many RTOs are not able to demonstrate full compliance with the required national standards when they are audited. Most, however, are able to do so at the completion of the regulatory process. Of the 77 RTOs audited, only 20 (26.0%) were found to be fully compliant with the required national training standards. The 57 (74.0%) RTOs that were not able to demonstrate full compliance with the standards at the initial audit were given a 20-working-day period to rectify their non-compliance. Some 33 RTOs were able to do so, bringing the total number of RTOs who were able to demonstrate full compliance by the completion of the audit process to 53 (68.8%), with 24 RTOs (31.2%) not complying with all of the required standards.

In this review, we found that providers of early childhood education and care training had lower levels of compliance at the completion of the audit process when compared with all RTOs audited in the period 1 July 2012 to 31 December 2013. That is, 68.8% of the RTOs in this review were fully compliant at the completion of the audit process compared with 75.5% of all RTOs. The likely reason for the lower level of post-rectification compliance among the 77 providers audited for the review is that during the review period, RTOs were transitioning to a new training package. As such, one of the recommendations discussed below is to test this supposition through some targeted audits later in 2015.

ASQA undertook various regulatory actions against the 24 RTOs that were unable to demonstrate full compliance at the completion of the audit process. Some 16 of these RTOs were subsequently able to demonstrate full compliance with the required standards following ASQA issuing them with a notice of intention to cancel/suspend all or part of their registration. Once this regulatory action was complete, this

bought the total number of RTOs fully complying with the standards up to 69 (89.6%) of the 77 RTOs in this review. Of the remaining eight RTOs, two had their re-registration rejected, two had applications to add early childhood education and care training onto their registration refused, two withdrew their registration following ASQA's regulatory activity, one moved to a different regulator and one appealed ASQA's decision in the Administrative Appeals Tribunal (AAT).

In all cases where non-compliance was identified, the RTOs experienced difficulties in achieving compliance with the standard concerning assessment (Standard 15.5 [Standard 1.8 of the 2015 Standards]). This is consistent with ASQA's findings across the VET sector and is not limited to early childhood education and care training. The new *Standards for RTOs 2015*, which commenced on 1 April 2015, have considerably strengthened requirements around assessment. Together with the work ASQA is doing to better inform RTOs about what is required to meet the new standards—particularly around assessment—it is hoped this will lead to an improvement in how RTOs undertake assessment.

After taking account of the fact that RTOs delivering early childhood education and care training were in the process of transition to a new training package, ASQA has concluded that the quality of training here is largely comparable with that in the VET sector as a whole. Although only a quarter of RTOs were able to demonstrate full compliance with all the standards when initially audited, the majority of RTOs were able to do so after a short (20 day) rectification period.

Nevertheless, the main findings in this report—of inadequate assessment and the delivery of too many courses in a very short time—is common across the rest of the VET sector, giving rise to two key concerns. The first concern is that trainees are not being fully skilled and properly assessed, meaning that employers are not always getting fully skilled employees. The second concern relates to those RTOs that are trying to provide high-quality programs that are capable of delivering the skills and competencies required in a meaningful way—these RTOs are being faced with unfair competition (in terms of downward pressure, or the lowering of costs or prices to unrealistic levels) from those RTOs that are providing 'cheap' and unrealistically short training programs. This situation is threatening the long-term financial sustainability of the Australian training market.

Recommendations

Ten recommendations are made in this report. The recommendations focus on particular areas of concern that have been identified through:

- the research undertaken for this review
- consultation with stakeholders, and
- ASQA's regulatory work, including work undertaken specifically for this review.

Overcoming the short courses problem

The biggest threat to the overall quality of VET is that far too many providers are delivering courses that are too short to ensure that:

- people are gaining all of the required skills and competencies, or
- they are being assessed properly.

This review into early childhood education and care training has confirmed ASQA's findings from previous national reviews—which looked at aged and community care training, the white card in the building and construction industry, and the marketing practices of RTOs—that short course delivery undermines the quality of training and assessment.

Australia's competency-based VET system is properly focused on people gaining the skills and competencies specified in each training package qualification (rather than being a system based on people serving a particular amount of time in a training course). Training package qualifications link the skills required for occupations to the VET qualification designed to deliver those skills and competencies.

However, in response to concerns about too much short-duration training, Australian ministers for training endorsed volume of learning benchmarks (for course developers) in the AQF, which were to be fully implemented by 1 January 2015. These benchmarks are:

- 0.5 to 1 year (600–1200 hours) for a certificate I
- 0.5 to 1 year (600–1200 hours) for a certificate II
- 1 to 2 years (1200–2400 hours) for a certificate III
- 0.5 to 2 years (600–2400 hours) for a certificate IV
- 1 to 2 years (1200–2400 hours) for a diploma, and
- 1.5 to 2 years (1800–2400 hours) for an advanced diploma

Although directed at VET sector program developers, these requirements have largely been ignored by training package developers. Training packages generally do not specify benchmarks for the sufficient amount of training for a learner who is new to the training area to be able to gain the required skills and competencies for each AQF VET qualification. The *Standards for RTOs 2015*, which commenced on 1 April 2015 for existing RTOs, make reference (in Standards 1.1 and 1.2) to RTOs ensuring that a sufficient amount of training is provided to enable each learner to meet the requirements for each unit of competency, unit or qualification in which they are enrolled. However, what this means in the case of each program in a training package is not specified.

This situation has led to confusion among RTOs about the appropriate duration of training for different training programs. It is also a contributing factor in the current 'race to the bottom'—where RTOs compete to provide ever shorter training courses in order to gain an edge in the training market.

This situation needs to be redressed. Simple enforcement of the current AQF benchmarks at each AQF level, regardless of the training area or any existing skills or experience some learners may already have, is too simplistic. (After all, in higher education, bachelor programs can and do vary in length for valid reasons.)

As such, a system where minimum volume of learning benchmarks are introduced to each training package for each AQF level (or part thereof) is recommended. This should, of course, allow RTOs to vary course length where learners' existing skills, knowledge and experience would enable completion at a faster rate.

Recommendation 1

It is recommended that—as a matter of urgency—the new training package arrangements which are currently being developed include minimum benchmarks around the amount of training required for each unit of competency and each VET qualification across the whole VET system.

Gaining intelligence from early childhood education and care providers about the quality of training and assessment provided by RTOs

Through the stakeholder consultation undertaken for this review, many providers of early childhood education and care expressed the view that some RTOs issuing qualifications to learners were not adequately preparing those learners for the workforce by providing proper training and assessment. That is, the learners and their future employers were 'being let down'. This perception was reinforced by the audit results that underpin the findings of RTO levels of compliance by national standards (discussed in Chapter Five). The audit findings indicate that, in many instances, work placements that provide structured learning and appropriate assessment for students are not done well.

ASQA's risk-based regulation relies on data and intelligence to enable effective regulation, which includes sanctioning RTOs where appropriate. It would assist ASQA considerably if early childhood education and care providers could access a simple process for reporting concerns about RTOs to ASQA—so that ASQA can evaluate those concerns and take action.

Recommendation 2

It is recommended that ASQA, Australian Children's Education and Care Quality Authority, and other relevant stakeholders work with the peak bodies that represent the providers of early childhood education and care to improve the process for, and coverage of, early childhood education and care providers informing ASQA of concerns they may have about the quality of training and assessment provided by registered training organisations.

Educating RTOs

The systemic poor practices identified through this review indicate that many RTOs are not complying with the training package requirements and/or the RTO standards relating to providing the skills and competencies necessary for employment in the early childhood education and care sector. This demonstrates a clear need for these providers to improve their training and assessment services. There is also a need for ASQA and the relevant training package developer to explain the key findings of this review to all RTOs delivering these qualifications.

Recommendation 3

It is recommended that ASQA—working with the relevant training package developer—develop and implement a systematic communications strategy to engage with registered training organisations delivering early childhood education and care, in order to explain and reinforce the key findings of this review.

Targeted audits in 2015 of early childhood education and care training

The findings of this review indicated that RTOs may have had difficulty with transitioning to the CHC Community Services Training Package (2013 release). This may be the reason some RTOs have not been able to demonstrate compliance with the RTO standards. It is important that this proposition is tested once the new training package has been in place for a year.

The findings of this review also indicated that a significant amount of distance learning (including online) is occurring. Both employers consulted for this review and the Productivity Commission in its report (2011a) queried the suitability of this mode of delivery.

Recommendation 4

It is recommended that, towards the end of 2015, ASQA undertakes:

- a targeted strategic audit on the implementation of *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care*, and
- a targeted strategic audit of distance learning, including online delivery, of early childhood education and care training.

Clarity in training packages related to assessment evidence

Assessment, particularly assessment in the workplace, has been identified through the audits and stakeholder feedback as a matter of concern. One of the contributing factors may be the over-specificity provided in Community Services Training Packages.

Getting the balance right is a difficult task for training package developers. There has been a tendency to add further details and requirements to units of competency in relation to performance and assessment, with the aim of improving the validity of assessment decisions.

Although the CHC Community Services Training Package (2013 release) adheres to the new streamlined format, the balance between broad occupation functions and narrowly defined competencies may have been compromised. This has possibly resulted in over-specification of tasks and a loss of the holistic nature of competence in this training package.

Recommendation 5

It is recommended that any revisions of the Community Services Training Package include reviewing the clarity of wording and expectations of assessment evidence in the units of competency, in order to ensure that advice is unambiguous, clear and aligned with the definition of competency and the rules of evidence.

RTO engagement with industry to strengthen workplace learning

The importance of work placement in vocational education and training is an issue that is internationally recognised. However, structured workplace learning requires more than just placing learners in the workplace in the hope that they learn skills and knowledge. Rather, it involves the trainer/assessor and

the workplace representatives planning the learning that needs to occur. The notion of structured workplace learning, and engaging employers in this process, is included in the Standard 16.3 (Standards 5.1 and 5.2 of the 2015 Standards), which states:

Employers and other parties who contribute to each learner's training and assessment are engaged in the development, delivery and monitoring of training and assessment.

The inability of RTOs to structure workplace learning and assessment raises a range of other issues, including poor development of workplace skills and knowledge and poor workplace assessment practice.

Recommendation 6

Given that most RTOs reviewed did not effectively embed structured work placement into the learning and assessment strategies—and given the high level of non-compliance against the assessment standard (Standard 15.5 [Standard 1.8 of the 2015 Standards])—it is recommended that RTOs strengthen their engagement with industry employers to ensure that structured workplace learning and assessment is embedded in course delivery.

Adequate provision of training and assessment in an actual or simulated workplace

The audits, and the stakeholder feedback provided for this review, indicated that RTOs had difficulty simulating a workplace environment. Where actual work placements occurred, in some cases students did not undertake typical workplace tasks, such as changing babies' nappies.

Recommendation 7

It is recommended that any revisions to training packages clearly identify any requirements in each unit of competency for:

- workplace delivery and assessment
- delivery and assessment to be undertaken in a simulated workplace context (including what constitutes an appropriate workplace assessment in each case), and
- repeated demonstration of competencies in the workplace (including what that means for each unit of competency).

Quality of assessment and assessors

The findings of this strategic review confirm that:

- the highest level of non-compliance is with the assessment standard (Standard 15.5 [Standard 1.8 of the 2015 Standards]), and
- that RTOs have the most difficulty gaining compliance with this Standard following the period of rectification.

The review findings also indicate that assessors and assessment tool developers lack the capability to interpret the requirements of the units of competency and that the RTOs lack the capacity to put into practice assessment approaches that meet the requirements of the training package.

A further issue is the effectiveness of validation processes to drive continuous improvement of assessment. Standard 15 of the *Standards for NVR RTOs 2012* states that validation should be systematically implemented. However, the review's findings were that although validation was systematically implemented, it was not necessarily rigorous enough to identify issues with assessment (and therefore did not provide for continuous improvement of assessment).

The quality of assessment and the capability of assessors is an issue not just for early childhood education and care but for the whole training sector.

Recommendation 8

It is recommended that at the next review of the Certificate IV in Training and Assessment:

- the assessment-related units of competency emphasise the analysis and interpretation of competencies, and
- consideration is given to the development of qualifications in VET assessment that could be introduced to supplement the current assessment capabilities of many assessors who currently hold the *TAE40110 Certificate IV in Training and Assessment* (or other qualifications that are considered to be equivalent).

It is recommended that when RTOs develop training materials for a revised Certificate IV in Training and Assessment, that they strengthen the learning and formative assessment activities related to the analysis and interpretation of competencies, in order to enhance the skills and knowledge of assessors in this area.

Recommendation 9

Given the issues with assessment that have been identified in this and the 2013 strategic reviews (ASQA 2013a and 2013b), it is recommended that ASQA:

- continue to focus on assessment and the implementation of validation strategies in its regulatory work, and
- continue to monitor the effectiveness of the strengthened validation requirements in the *Standards for RTOs 2015*.

Industry currency of trainers and assessors

The new *Standards for RTOs 2015* include revised requirements for trainers and assessors. The focus of the revised standards is clearly on vocational competence and currency. The findings from this strategic review indicate that it is difficult for RTOs to demonstrate that they have:

- established vocational competence of trainers and assessors, and/or
- maintained their vocational and training and assessment currency.

Good practice examples indicate that well-planned and implemented professional development forms the basis for meeting these requirements.

It is apparent that this issue is not particular to early childhood education and care training, but applies more generally to the whole vocational and training sector.

Recommendation 10

It is recommended that RTOs develop or enhance their ongoing professional development processes by:

- providing advice on relevant professional development for trainers and assessors, and
- investigating more systematic models that will assist trainers and assessors to demonstrate compliance with the Standard.

Conclusion

The future projections for the early childhood education and care sector indicate that there will be a continuing national shortage of child care workers, especially those with a diploma level qualification. In 2013, the Community Services and Health Industry Skills Council also indicated that—in order to meet the new requirements and increased demand for services—the number of child carers employed in Australia needed to increase by 15,500 (13%) between 2012 and 2017 (CSHISC 2014b). Projections by the Department of Employment (2014) indicate that this figure may be higher, and that employment in child care services is projected to grow by 21,600 (or 21.8%) between 2013 and 2018.

The role that RTOs play in meeting this demand is critical and the findings of this strategic review indicate that the VET sector may not be adequately equipped to ensure that there are suitably skilled workers in the sector.

Chapter 1 Introduction

1.1 Background

The Australian Skills Quality Authority (ASQA) commenced operations as the national regulator for Australia's vocational education and training (VET) sector on 1 July 2011.

ASQA regulates courses and RTOs to ensure nationally approved quality standards are met, so that students, employers and governments have confidence in the quality of vocational education and training outcomes delivered by Australian registered training organisations.

ASQA is the regulatory body for RTOs in:

- Australian Capital Territory
- New South Wales
- Northern Territory
- South Australia
- Queensland, and
- Tasmania.

ASQA is also the regulatory body for RTOs in Victoria and Western Australia:

- that offer courses to overseas students, and/or
- offer courses to students (including through offering courses online) in the Australian Capital Territory, New South Wales, the Northern Territory, South Australia, Queensland or Tasmania.

The total number of RTOs in Australia is 4656. ASQA regulates 3948 (84.8%) of these RTOs, as shown in Figure 1.

Figure 1: Regulators of Australia's RTOs



Source: training.gov.au 19 September 2014

1.2 Changes to the regulatory framework commencing in 2015

The Council of Australian Governments' (COAG) Industry and Skills Council is responsible for endorsing vocational education and training (VET) standards for RTOs. The purpose of these standards is to:

- describe the requirements that an organisation must meet in order to be an RTO in Australia, and
- ensure that training delivered by RTOs meets industry requirements (as set out in the training package or accredited course).

All RTOs in Australia are responsible for ensuring they fully comply with the Standards at all times as a condition of their registration.

The Standards describe outcomes RTOs must achieve, but do not prescribe the methods by which they must achieve these outcomes. This non-prescriptive approach:

- allows RTOs to be flexible and innovative in their VET delivery, and
- acknowledges that each RTO is different and needs to operate in a way that suits its clients and learners.

The Standards are enabled by the *National Vocational Education and Training Regulator Act 2011* (NVR Act), the Act under which ASQA operates.

On 26 September 2014, the Council of Australian Governments Industry and Skills Council agreed to new regulatory standards for training providers and regulators. The new provider standards (*Standards for Registered Training Organisations 2015*) were implemented from 1 January 2015 for new RTOs and from 1 April 2015 for existing RTOs.

This review of early childhood education and care training was undertaken in 2014, when the *Standards for NVR RTOs 2012* applied. Hence, where a specific reference is made to a 2012 Standard the report also includes in parenthesis the Standard that applies from 2015. In late 2014, ASQA published a [mapping summary](#), which maps the *Standards for NVR RTOs 2012* to the *Standards for Registered Training Organisations (RTOs) 2015*.

1.3 ASQA strategic reviews

As the national regulator, ASQA is committed to maintaining world-class vocational education and training standards across Australia. Section 35 (2) of the NVR Act states that 'the National VET Regulator may review or examine any aspect of an NVR registered training organisation's operations to determine any systemic issues relating to the quality of vocational education and training'.

Under this section of the Act, ASQA initiated three strategic reviews in 2012-13 targeting training 'hot spots' where intelligence had identified risks to the quality of outcomes achieved by training delivery and assessment. The three strategic reviews undertaken in 2012-13 were:

- training and assessment for the aged and community care sector
- the entry-level occupational health and safety training required to work on construction sites in Australia, commonly known as the White Card, and
- inappropriate marketing and advertising practices by RTOs.

ASQA strategic reviews conduct in-depth analysis of a particular issue, sector, qualification or method of delivery. The focus is on examining systemic poor practice and identifying appropriate actions to address the poor practice across the system, not just resolving issues with individual RTOs.

ASQA applies a proportionate and risk-based approach to regulation.

For ASQA, **proportionate** means that regulatory focus is concentrated on providers of concern (those that are not delivering quality training outcomes). Similarly, regulatory interventions are minimised for providers that consistently deliver high-quality training outcomes.

Risk-based regulation means targeting resources to areas that pose the greatest risk to the delivery of quality vocational education and training-and therefore the greatest risk to the reputation and economic wellbeing of Australia's training and international education industries. This approach also means that for high-quality providers, the burden of regulation can be minimised.

ASQA implements this proportionate and risk-focused regulation through several key methods:

- applying an agency-wide risk model that utilises data and intelligence to identify, evaluate and treat risks, and influences every aspect of the regulation of providers, from application to audit to enforcement.
- identifying and addressing major systemic risks through a program of strategic reviews, targeted at problematic subsectors of the training industry, and
- using complaints about regulated providers as a key source to gather data and inform how those providers are regulated.

In January 2014, ASQA announced that training in early childhood education and care, security and equine programs would come under the microscope in 2014.¹

ASQA's review into early childhood education and care training was prompted by the 2011 Productivity Commission report, *Early Childhood Development Workforce* (Productivity Commission 2011), and further informed by the Commission's 2014 report, *Child care and Early Childhood Learning* (Productivity Commission 2014). Early childhood education and care services have been the subject of significant reforms nationally over the past four years. Almost all children in Australia are exposed to some form of early childhood education and care services prior to starting formal schooling. The Australian Government is the largest funder of the sector, with outlays exceeding \$5 billion a year and growing. The quality of training undertaken by those who deliver such services has significant implications for the families and children who utilise these services as well as the wider economy.

Of concern was the Productivity Commission report finding that 'the quality of early childhood education and care training delivered by registered training organisations is highly variable' and that 'concerns about poor training from RTOs are widespread' (Productivity Commission 2011a, p. 203).

The report identified a number of key issues undermining the quality of the training in the early childhood education and care workforce and recommended ASQA take action. The issues identified included:

- the quality and variability of training provided to prepare early childhood education and care workers
- the different length of training provided for the same qualification by registered training organisations
- whether sufficient practical on-the-job training was being provided
- whether trainers and assessors possessed current industry experience, and
- the variable nature of assessment including recognition of prior learning practices.

¹ The media release can be accessed from: www.asqa.gov.au/news-and-media/training-regulator-to-review-key-sectors-of-the-economy.html

ASQA responded to the December 2011 release of the *Early Childhood Development Workforce* report by taking a number of actions to increase regulatory scrutiny of early childhood education and care training and to investigate the quality of delivery of such training by RTOs:

- First, ASQA agreed to **prioritise the regulatory scrutiny of early childhood education and care training**—from the end of 2013, any ASQA audit of an RTO that offered early childhood education and care training automatically included looked at that training as part of the audit. (Audits conducted by ASQA usually consider a sample of the training delivery, rather than all qualifications offered by the RTO). This priority has meant that early childhood education and care training was scrutinised in ASQA audits of RTOs delivering this training from November 2013.
- Second, in February 2014, ASQA completed **a survey of ASQA-regulated RTOs offering the certificate III or diploma in children’s services and early childhood education and care**. The survey sought to gather new information about how RTOs are providing early childhood education and care training.
- Third, following discussions with the Honourable Ian Macfarlane, the then Australian Government Minister for Industry, ASQA Commissioners decided to **establish this national strategic review of early childhood education and care training**. The review was established by utilising the powers conferred on ASQA under the *National Vocational Education and Training Regulator Act 2011*. The Act allows ASQA to conduct national strategic reviews of training quality in any areas of concern within the vocational education and training sector.

The national review commenced in January 2014.

1.4 Management committee and methodology

Governance of the review was provided by a management committee comprising ASQA and representatives from:

- Australian Government Department of Education
- Australian Government Department of Industry
- Community Services and Health Industry Skills Council
- Australian Children’s Education and Care Quality Authority
- Early Childhood Australia
- Australian Community Children’s Services
- Family Day Care Australia
- United Voice
- Training Accreditation Council Western Australia, and
- Victorian Registration and Qualifications Authority.

A list of individuals representing these organisations is included in Appendix A.

The management committee’s terms of reference were to:

- provide advice on the methodology for the review
- provide expert advice to the review
- provide a conduit to stakeholders
- oversee the progress of the review, and
- provide input to the review's final report.

The management committee agreed that the review should focus on training for the following qualifications:

- *CHC30708 Certificate III in Children's Services* (superseded)
- *CHC30712 Certificate III in Children's Services* (superseded)
- *CHC30113 Certificate III in Early Childhood Education and Care*
- *CHC50908 Diploma of Children's Services (Early Childhood Education and Care)* (superseded), and
- *CHC50113 Diploma of Early Childhood Education and Care*.

The qualifications for people working in the early childhood education and care sector are specified in the Community Services Training Package:

- The certificate III 'reflects the role of workers in a range of early childhood education settings who work within the requirements of the Education and Care Services National Regulations and the National Quality Standard. They support the implementation of an approved learning framework, and support children's wellbeing, learning and development. Depending on the setting, educators may work under direct supervision or autonomously.'
- The diploma 'reflects the role of early childhood educators who are responsible for designing and implementing curriculum in early childhood education and care services. In doing so, they work to implement an approved learning framework within the requirements of the Education and Care Services National Regulations and the National Quality Standard. They may have responsibility for supervision of volunteers or other staff.'

These qualifications reflect the key roles of coordinators and educators employed in early childhood education and care centres. The *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care* directly reflect the requirements of the National Quality Framework for Early Childhood Education and Care.

At the time of the review three qualifications, the *CHC30708* and *CHC30712 Certificate III in Children's Services* and *CHC50908 Diploma of Children's Services (Early Childhood Education and Care)* had been superseded by new qualifications from the CHC Community Services training package.

Understanding the transition process for superseded qualifications

The *Standards for NVR Registered Training Organisations 2012* (which applied during the period of this review), required RTOs or applicant RTOs to manage the transition from superseded training packages within 12 months of their publication on the national register, so that they only deliver currently endorsed training packages. ASQA's *General direction- transition and teach-out*² provided further clarity for RTOs on this Standard. The period of 12 months was defined as the 'transition period' (ASQA 2014a).

The general direction indicated that for superseded qualifications:

- An RTO may continue to deliver training and assessment services and issue awards to current students of the superseded qualification who would have been genuinely disadvantaged if required to transfer to the replacement qualification for up to six months after the expiry of the transition period for its replacement.
- No teach-out provisions apply to superseded units of competency.
- Students who have not completed a superseded qualification within 18 months, or a superseded

² This General Direction has now been replaced by the *General Direction - learner transition where a training product is no longer current*.
<http://asqa.gov.au/news-and-publications/publications/general-directions/general-directions.html>

Understanding the transition process for superseded qualifications

unit of competency within 12 months, following publication of the item being superseded on the national register must be immediately issued with an AQF testamur for which they may be eligible and transferred to a new qualification or new RTO.

- Except to replace a testamur issued by the RTO previously, an RTO must not issue an AQF testamur to a student for a qualification that was superseded more than 18 months ago.
- During the teach-out period, the RTO must not enrol students and/or commence delivery in the superseded qualification.

Therefore, at the time of the review, RTOs that had superseded qualifications on their scope of registration were:

- working towards finishing programs and completing students related to superseded qualifications, and
- concurrently preparing to provide training and assessment services for the new qualifications.

This preparation required RTOs to:

- review their training and assessment materials to meet the CHC Community Services Training Package units of competency and any requirements related to work placement, and
- ensure that trainers/assessors were vocationally competent and current in their vocational field.

The methodology used to undertake the national strategic review of training of early childhood education and care training is summarised in Appendix B. As part of this review, ASQA:

- reviewed various reports, environmental scans and census data
- consulted with key stakeholders and surveyed all RTOs delivering the relevant qualifications
- analysed complaints received in relation to RTOs undertaking the relevant qualifications
- interviewed students, RTO representatives and employers in early childhood education and care ('the voices'), and
- audited 77 RTOs offering early childhood education and care training.

1.5 Structure of this report

- **Chapter 2:** Explores developments in the early childhood education and care industry, particularly with respect to future workforce requirements and needs.
- **Chapter 3:** Outlines the nature of training in the early childhood education and care industry. Data on training provision has been collated to provide an overview of the type and distribution of training.
- **Chapter 4:** Provides a summary of stakeholder perspectives gathered through consultation with employers, employees and students engaged in the sector.
- **Chapter 5:** Details the compliance of RTOs offering early childhood education training with the requirements of standards for RTOs. Compliance with training and assessment standards, the adequacy of the training resources provided by RTOs, the qualifications and required industry competencies of trainers, the quality of assessment, the provision of appropriate information by RTOs to trainees and the adequacy of engagement with industry are examined.
- **Chapter 6:** Presents a summary of the main findings of the review, together with recommendations and a discussion of the way forward.

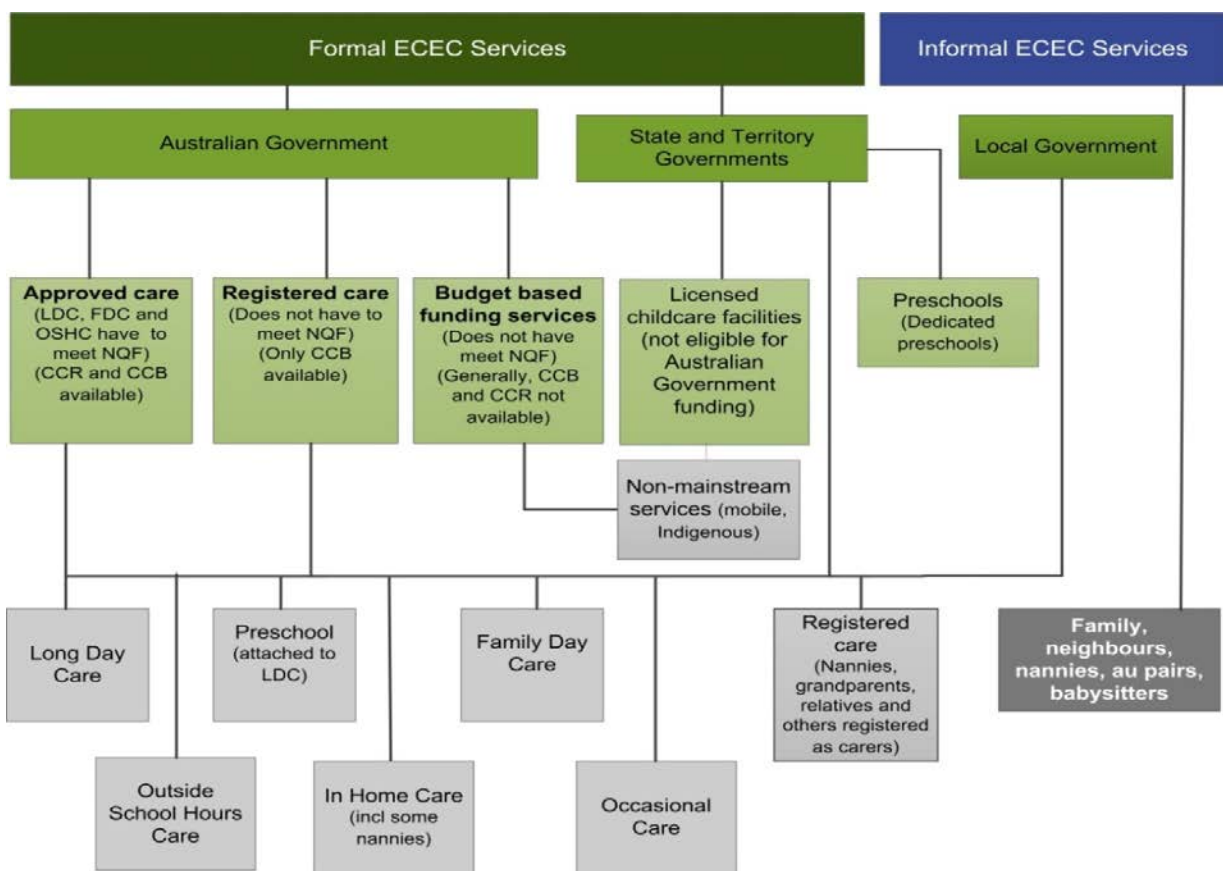
Chapter 2 Developments in the early childhood education and care industry

2.1 The nature of the industry

The early childhood education and care industry is large, diverse and growing, and touches the lives of almost every family in Australia. In 2012, around 19,400 child care and early learning services enrolled more than 1.3 million children in at least one child care or preschool programme (comprising around 15,100 approved child care services and 4300 preschools) (Productivity Commission 2011).

An overview of the sector is shown in Figure 2.

Figure 2: Early childhood development sector



Source: Productivity Commission (2014)

Note: ECEC = early childhood education and care, LDC = Long day care, FDC = Family day care, OSHC = outside school hours care, NQF = National Quality Framework, CCR = Child Care Rebate and CCB = Child Care Benefit

Formal early childhood education and care services are mostly provided away from children's homes. These formal services encompass:

- long day care centres
- family day care centres
- occasional care centres
- preschool services attached to long day care centres or preschool centres, and
- outside school-hours care (for example, before or after school, or in school holiday periods, or a combination of these).

The formal sector is government regulated and most care services receive some form of public funding and/or subsidy. The formal sector is separated into 'approved care' and 'registered care'.

Approximately 90% of children are in 'approved care', which is 'those services approved by the Australian Government for Child Care Benefit purposes in accordance with the Government's standards and requirements' (Productivity Commission 2014, p. 80).

'Registered care' is defined as 'child care provided by grandparents or other relatives, friends, neighbours, nannies or babysitters who are registered as carers with the Department of Human Services' (Productivity Commission 2014, p. 80).

The number of approved child care services in the sector is shown in Table 1.

Table 1: Number of approved child care services by type and state and territory 2012–13*

	NSW	Vic	Qld	SA	WA	Tas	NT	ACT	Aust
Long day care	2700	1282	1432	325	532	118	76	120	6585
Family day care	136	190	112	21	29	13	6	7	512
In-home care	21	17	21	<5	6	<5		<5	71
Occasional care	38	57	8	<5	11	<5		<5	123
Outside school hours care	2682	2244	1 969	906	844	247	108	209	9208
Before school care	818	767	593	296	255	50	9	53	2841
After school care	1057	1051	724	341	333	117	54	98	3774
Vacation care	807	426	652	270	256	80	45	58	2594
Total	5577	3776	3542	1257	1421	385	190	340	16,484

* The sum of the component parts may not equal the total because providers may offer more than one type of service.

Primary Source: Department of Education administrative data (2012-13).

Source: Productivity Commission (2014)

There were more than 35,000 registered care providers in Australia in 2013. The number of registered providers in each state and territory is shown in Table 2.

Table 2: Registered care providers and registered care providers with Child Care Benefit claims, by state and territory, 2012–2013*

	Registered care providers	Share of total registered care providers %	Registered care providers with Child Care Benefit claims	Share of registered care providers with Child Care Benefit claims %
New South Wales	9823	27.9	1,865	19.0
Victoria	9460	26.8	1,712	18.0
Queensland	8180	23.2	1,138	14.5
South Australia	2286	6.5	162	7.0
Western Australia	2149	6.1	197	9.2
Tasmania	723	2.0	76	10.5
Australian Capital Territory	779	2.2	77	9.9
Northern Territory	318	0.9	17	0.5
Location unknown	1542	4.4	173	
Total	35,260	100	5,417	15.4

* Registered care providers include all active providers. Registered care providers with claims for Child Care Benefit Claims, include all active registered care providers who provided care regardless of whether or not the Child Care Benefit claim was successful.

Primary Source: Department of Human Services data.

Source: Productivity Commission (2014)

The informal sector is defined as care provided by relatives, friends, neighbours, nannies, au pairs and babysitters, which may be on a paid or unpaid basis (Productivity Commission 2014, p. 80).

The early childhood education and care workforce is 'expected to provide not just child care and child minding services, but also education services that enhance the development of children' (Productivity Commission 2011a, p. 58). This educational emphasis is outlined in the *Early Years Learning Framework for Australia* (Department of Education Employment and Workplace Relations 2010). The framework is intended to support curriculum decision-making to extend and enrich children's learning from birth to five years and through to the transition to school. Under this framework, 'directors and teachers act as pedagogical leaders guiding and organising [early childhood education and care] educators in order to build shared understanding about child development ... and also encourage family and community participation in [early childhood education and care]' (Productivity Commission 2011a, p. 58).

The *Early Years Learning Framework for Australia* (2010) is part of Australia's National Quality Framework for Early Childhood Education and Care, which was endorsed by the Council of Australian Governments on 7 December 2009. The National Quality Framework is an agreement between the Australian Government and states and territories to work together to provide better educational and developmental outcomes for children using early childhood education and care services. The agreement included a new quality standard to improve education and care across long day care, family day care,

preschool/kindergarten, and outside school hours care. The agreement also included the establishment of the Australian Children's Education and Care Quality Authority—a national body responsible for overseeing the new system and ensuring consistency of approach.

These initiatives were part of the Council of Australian Governments' *Investing in the Early Years—A National Early Childhood Development Strategy* (2009) which focused on ensuring that 'by 2020 all children have the best start in life to create a better future for themselves and for the nation' (COAG 2009, p. 13). This vision required an early childhood development system that supported best practice and continuous improvement in service delivery, with 'quality assurance and regulatory arrangements, covering aspects of quality such as qualifications, child-to-staff ratios and health and safety' (COAG 2009, p. 13).

2.2 The nature of the existing workforce

The formal early childhood education and care workforce has grown rapidly, more than doubling in size between 1997 and 2013. At the time of the National Early Childhood Education and Care Workforce Census in 2013, there were 153,155 early childhood education and care workers (The Social Research Centre 2014). A breakdown of the workforce by state/territory and by provider service type is shown in Table 3.

Table 3: Size of early childhood education and care workforce in the national Early Childhood Education and Care Workforce Census*

	PS	LDC	FDC	IHC	OCC	OSHC	VAC	Total	Total %
NSW	8284	24,792	4496	327	296	5436	4557	48,188	31.5
Vic	6840	17,490	4114	447	339	4102	2729	36,061	23.5
Qld	3527	18,260	2516	550	90	4031	4090	33,065	21.6
SA	2051	5388	975	115	2	1785	1935	12,250	8.0
WA	4399	5533	1130	218	108	1310	1295	13,993	9.1
Tas	882	1477	447	145	18	364	362	3695	2.4
NT	456	734	260	0	0	221	228	1898	1.2
ACT	513	1972	117	7	19	837	541	4005	2.6
Total	26,952	75,646	14,054	1,809	872	18,086	15,737	153,155	100.0
Total %	17.6	49.4	9.2	1.2	0.6	11.8	10.3	100.0	

* Totals may not equal sum of components due to rounding of weighted data.

PS = preschool, LDC = long day care, FDC = family day care, IHC = In home care, OCC = Occasional child care, OSHC = Outside school hours care, VAC = Vacation care

Source: 2013 National Early Childhood Education and Care Workforce Census

The largest subsector comprises those engaged in long day care services, who make up 49.4% of the workforce. Preschool services comprise 17.6% of the workforce, outside school hours 11.8%, vacation

care 10.3% and family day care services 9.2%. Overall, 89.9% of the workforce was engaged in a contact role, with a small proportion of the workforce (0.6%) working in an unpaid capacity (The Social Research Centre 2014).

The workforce is overwhelmingly female (94%). Males and younger early childhood education and care workers were more likely to be employed in outside school-hours care and vacation care services. Preschools employed an older group of early childhood education and care workers, with 65.5% of preschool employees aged 40 and over; similarly, 62.8% of family day care employees were aged 40 and over. The workforce is also 97.9% non-indigenous. The proportion of indigenous early childhood education and care workers was highest among the preschool workforce (3.3%) and lowest among family day carers (0.7%) (The Social Research Centre 2014).

There are two different groups of early childhood education and care workers:

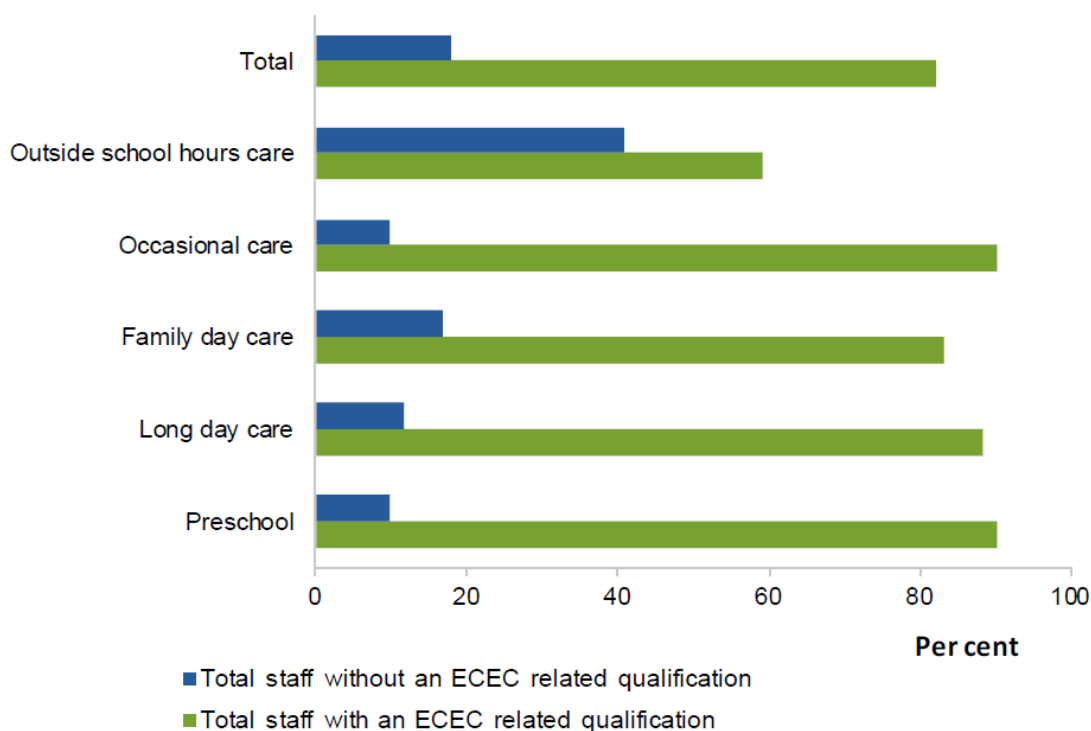
- those employed as directors or teachers, who make up approximately 30% of the workforce, and
- those employed as early childhood education and care educators/workers, who make up approximately 70% of the workforce.

The first group (directors or teachers) undertakes course planning and leads the educators/workers in the second group, who provide education and care services (Productivity Commission 2011a).

More than 82% of the early childhood education and care workforce had an early childhood education and care-related qualification. Of those with a related qualification, 16% had a bachelor degree (three years or equivalent) or higher-level qualification; and 64.6% had an advanced diploma, diploma or a certificate III or IV. Early childhood education and care workforce in occasional care (90.1%), long day care (88.3%) and family day care (83.1%) services 'were most likely to have an early childhood education and care-related qualification' (The Social Research Centre, 2014, p. 12).

There has been a decrease in the percentage of those in the workforce without an early childhood education and care related qualification. In 2010—at the time of the previous early childhood education and care workforce census—30% of employees did not have a related qualification; by 2013, 8% of those in the workforce did not have such a qualification (The Social Research Centre, 2014). Refer to Figure 3.

Figure 3: Share of early childhood education and care workforce with and without an early childhood education and care-related qualification*, 2013



* Relevant early childhood education and care qualifications include early childhood teaching, primary teaching, other teaching, child care, nursing, other human welfare studies, behavioural science and other early childhood education and care related qualifications. The population is the paid staff engaged in a contact role.

Data source: The Social Research Centre (2014).

Source: Productivity Commission 2014.

The Social Research Centre data indicates that ‘overall, hours worked in the sector were evenly balanced between short part-time hours (0 to 19 hours, 27.4 per cent), long part-time hours (20 to 34 hours, 31.3 per cent) and full-time hours (35 to 40 hours, 33.5 per cent), with a relatively small proportion of the workforce working long hours (41 or more hours, 7.8 per cent)’ (The Social Research Centre 2014, p. 11).

2.3 The changing workforce

The National Quality Framework for Early Childhood Education and Care, endorsed by the Council of Australian Governments on 7 December 2009, aims to raise quality and enable continuous improvement in early childhood education and care. The National Quality Framework was introduced in Australia as part of a new quality standard to improve education and care across long day care, family day care, preschool/kindergarten and outside school hours care.

Under the National Quality Framework (Australian Children’s Education and Care Quality Authority 2014) requirements relating to educator and coordinator qualifications have applied since 1 January 2014. These requirements have clear ramifications for the VET sector in terms of providing quality training and assessment services to meet the demand for higher-level qualifications for this workforce. It is these qualifications that form the focus of this strategic review.

2.4 Future workforce needs

The Department of Employment's *Employment Outlook to November 2018* (2014) indicates that employment in child care services is projected to grow by 21,600 (or 21.8 %) between 2013 and 2018.

The National Quality Framework for Early Childhood Education and Care reforms will continue to increase the demand for early childhood education and care training. The Productivity Commission anticipated that 'in addition to the current enrolment level, around 45,000 new and existing educators and over 1000 extra early childhood teachers will require training' (2011a, p. 203).

The Productivity Commission research report *Early Childhood Development Workforce* (2011) identified persistent skills shortages across the early childhood education and care workforce, with a shortage of suitably qualified early childhood education and care teachers, directors and educators. The report indicated that there were between five and 11 applicants per vacancy in the sector. On average, only 1.1 applicants were suitable for the job (compared to a workforce average of 1.5 suitable applicants per vacancy) (2011a, p. 72).

The two key factors contributing to the current workforce skill shortages are:

- the increasing number of children accessing early childhood education and care services each year, raising the demand for early childhood workers, and
- the introduction of the requirement for providers to maintain a specific ratio of certificate III, diploma and degree qualified staff—which has meant that most service providers have had to recruit more-appropriately qualified workers, and upskill their existing workers (Community Services and Health Industry Skills Council 2014b).

The Community Services and Health Industry Skills Council (2014b) indicated there was a national shortage of child care educators, especially those with a diploma-level qualification in 2013. Projections indicated that, in order to meet the new requirements of the National Quality Framework and increased demand for services, the number of child care educators employed in Australia would need to increase by 15,500 (13%) between 2012 and 2017. It is anticipated that these shortages are likely to persist in the immediate future.

Chapter 3 The scale and nature of training in the early childhood education and care sector

3.1 Number of RTOs registered to provide early childhood education and care training

As at 17 December 2014, there were 394 RTOs registered on the national register, training.gov.au, to provide one or more children's services/early childhood education and care qualifications. Most of these RTOs were registered to provide both the certificate III and diploma of children's services/early childhood education and care qualifications.

Of the 394 RTOs registered to provide these qualifications, 321 (81.5%) were regulated by ASQA; 51 (12.9%) were regulated by the Victorian Registration and Qualifications Authority; and the remaining 22 (5.6%) were regulated by the Training Accreditation Council Western Australia, as shown in Table 4.

Table 4: RTOs registered to deliver children's services and/or early childhood education and care training at the certificate III and diploma level, by regulator

Number of providers registered for:	Regulator			Total number of providers
	ASQA	VRQA	WA TAC	
Only certificate III level children's services/early childhood education and care	52	0	0	52
Only diploma level children's services/early childhood education and care	9	0	0	9
Both certificate III and diploma level children's services/early childhood education and care	260	51	22	333
TOTAL number of providers registered to deliver one or more children's services/early childhood education and care qualifications	321	51	22	394

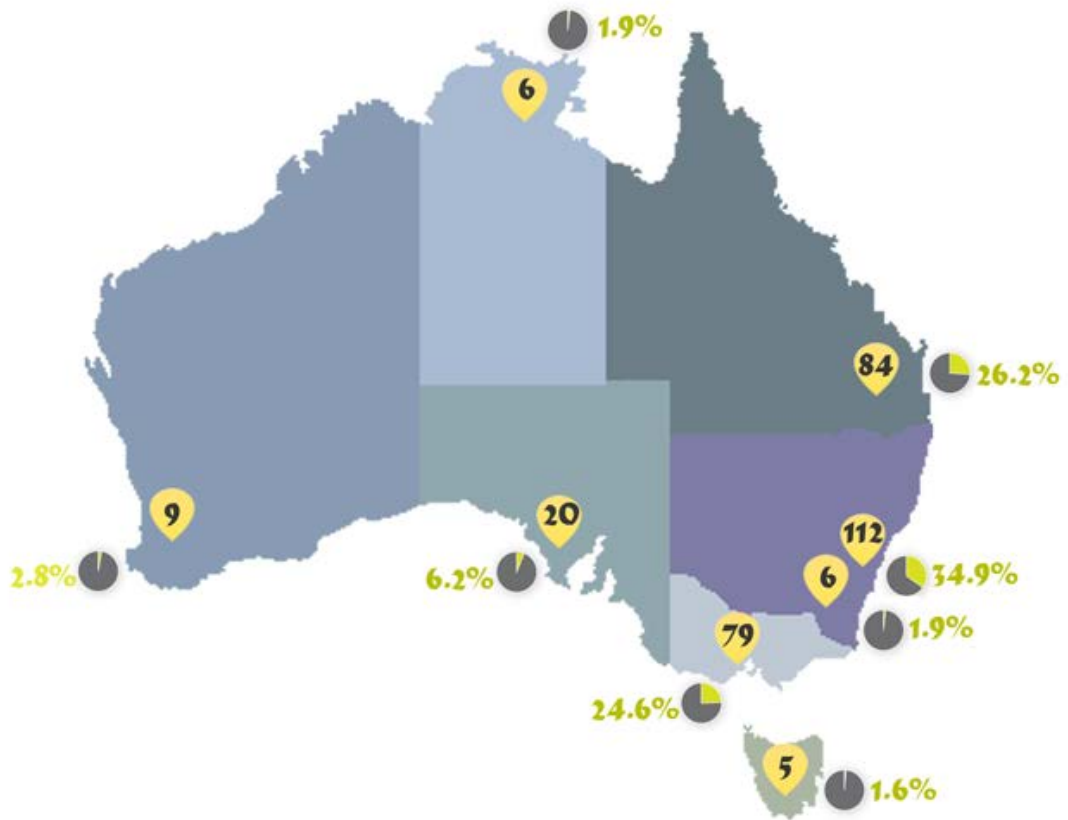
Source training.gov.au 17 December 2014

Notes: ASQA Certificate III = CHC30113, Western Australia Training Accreditation Council and Victorian Registration and Quality Authority Cert III = CHC30708, CHC30712 and CHC30113

Notes: ASQA diploma = CHC50113, Training Accreditation Council Western Australia and Victorian Registration and Qualifications Authority = CHC50908 and CHC50113

ASQA-regulated RTOs offering early childhood education and care qualifications are spread across Australia, as shown in Figure 4.

Figure 4: ASQA-regulated RTOs offering early childhood education and care qualifications by state and territory location of head office, December 2014

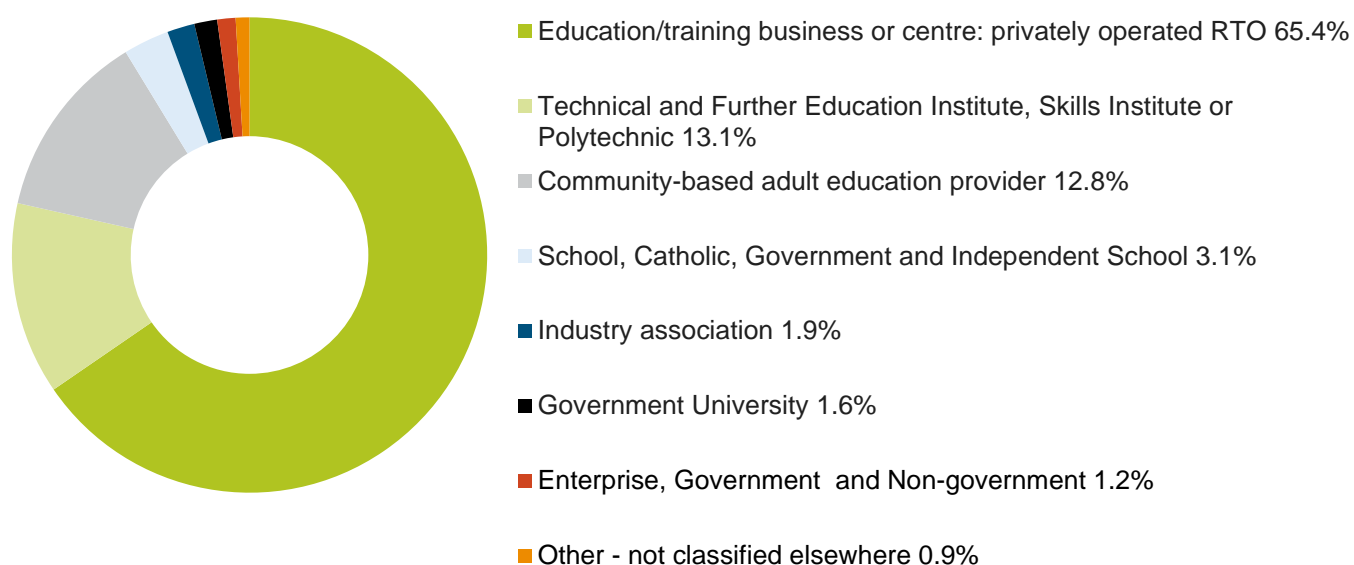


Source: ASQAnet 17 December 2014

3.2 Characteristics of early childhood education and care training provision

There were 321 RTOs registered with ASQA to deliver *CHC30113 Certificate III in Early Childhood Education and Care* and/or *CHC50113 Diploma of Early Childhood Education and Care* as at 17 December 2014. The profile of these RTOs by training organisation type is shown in Figure 5.

Figure 5: ASQA-registered RTOs by training organisation type



Source: ASQAnet 17 December 2014.

3.3 The national training effort in early childhood education and care

The National Centre for Vocational Education Research (NCVER) is an independent government body responsible for collecting, managing, analysing, evaluating and communicating research and statistics about vocational education and training (VET) nationally. Data is collected from government-funded and privately operated training providers.

Certificate III enrolments and completions

Between 2010 and 2013, enrolments more than doubled for certificate III courses in early childhood/children's services, which comprise:

- *CHC30708 Certificate III in Children's Services* (superseded)
- *CHC30712 Certificate III in Children's Services* (superseded), and
- *CHC30113 Certificate III in Early Childhood Education and Care*.

The biggest increase in enrolments occurred between 2011 and 2012. The combined number of enrolments in the Certificate III in Children's Services and the Certificate III in Early Childhood Education and Care from 2010 to 2013 for TAFE and other publicly funded providers is shown in Table 5.

Table 5: Number of enrolments in the Certificate III in Children’s Services and the Certificate III in Early Childhood Education and Care, combined, from 2010 – 2013

Year	Total number of enrolments
2010	22,181
2011	37,370
2012	43,770
2013	49,119

Source: National Centre for Vocational Education Research National VET Provider Collections 2009 – 2013

The growth of enrolments between 2010 and 2013 in the Certificate III in Children’s Services and Certificate III in Early Childhood Education and Care (combined) is shown in Table 6.

In 2012 and 2013, there was an increase in the number of students choosing full-time pathways compared to the previous years. Full-time and part-time study modes are based on hours of delivery, with any student undertaking 540 or more hours a year regarded as full-time (these figures are based on publicly funded training, which includes some private RTOs plus Technical and Further Education).

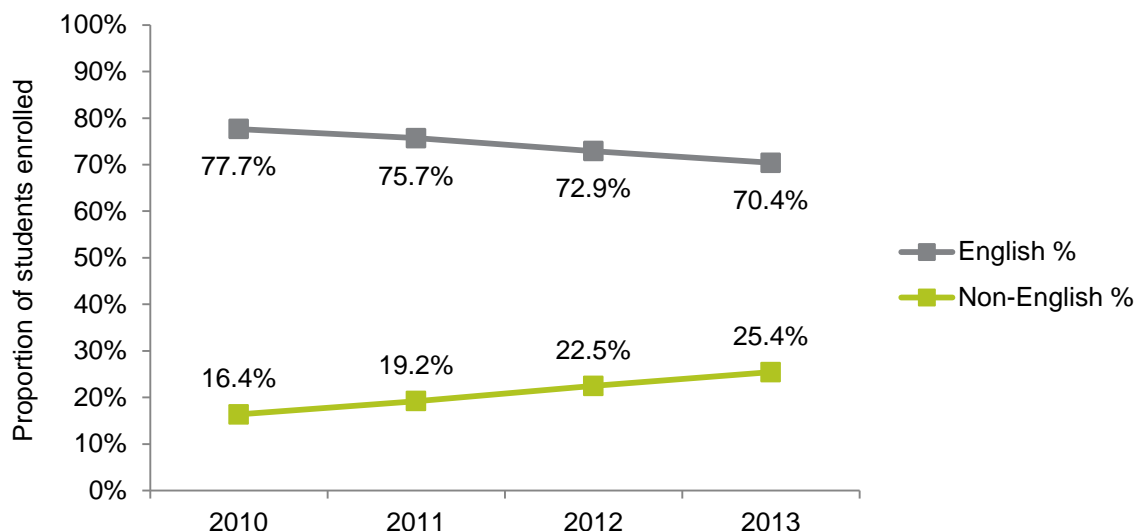
Table 6: Full-time or part-time mode, certificate III, 2010 – 2013

	2010		2011		2012		2013	
	Number	%	Number	%	Number	%	Number	%
Full-time	3,788	17.1	5,258	14.1	9,290	21.2	11,282	23.0
Part-time	18,393	82.9	32,112	85.9	34,480	78.8	37,837	77.0
Total	22,181	100	37,370	100	43,770	100	49,119	100

Source: National Centre for Vocational Education Research National VET Provider Collection, 2010 – 2013.

In addition, there has been a steady increase in the number of students who speak a language other than English at home enrolling in certificate III qualifications, as shown in Figure 6.

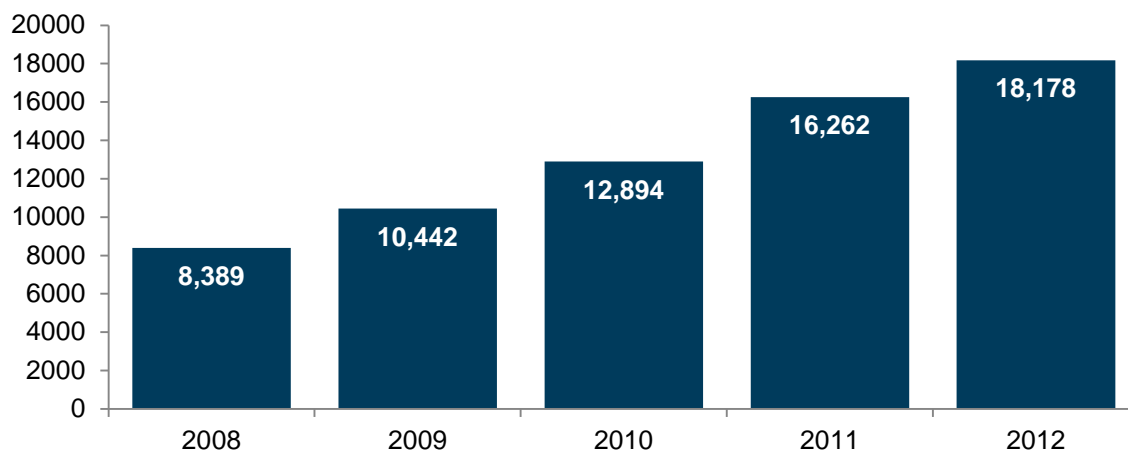
Figure 6: Proportion of students enrolled in certificate III level children’s services/early childhood education and care qualifications by main language spoken at home, calendar years 2010 – 2013



Source: National Centre for Vocational Education Research National VET Provider Collection, 2010 – 2013.

There has been a steady rise in the number of these qualifications completed, which more than doubled between 2008 and 2012, as shown in Figure 7.

Figure 7: Certificate III in Children’s Services Student Completions calendar years 2008 – 2012*†



Source: National Centre for Vocational Education Research National VET Provider Collection, 2008-13.

* To reduce the impact of significant declines and increases of student completion numbers that may be due to a training package qualification being superseded by another training package qualification, figures 6 and 7 above combine completions from CHC30402, CHC30708 and CHC30712.

† Final qualifications completed data for 2013 are not available. Only preliminary data is available from the 2013 National VET Provider Collection—for this reason CHC30113 returns a null count and had not been included.

Diploma enrolments and completions

The enrolment data for *CHC50302 Diploma of Children's Services*, *CHC50908 Diploma of Children's Services* and the *CHC50113 Diploma of Early Childhood Education and Care* between 2010 and 2013 is shown in Table 7. Over this period, enrolments in these qualifications more than doubled, with the biggest uptake in enrolment occurring among 25- to 44-year-old females.

Table 7: Total number of enrolments, diplomas*, by year, 2010 – 2013

Year	Total number of enrolments
2010	11,417
2011	21,399
2012	26,984
2013	31,044

Source: National Centre for Vocational Education National VET Provider Collection, 2009-13

Note: * Figures shown are for the *CHC50302 Diploma of Children's Services*, *CHC50908 Diploma of Children's Services* and the *CHC50113 Diploma of Early Childhood Education and Care* combined.

In 2011 and 2012, the number of students choosing full-time pathways increased, compared to previous years, as shown in Table 8. Interestingly, significantly more students in the diploma course chose a full-time pathway.

Table 8: Number of enrolments by full-time or part-time mode, diploma, 2010-2013

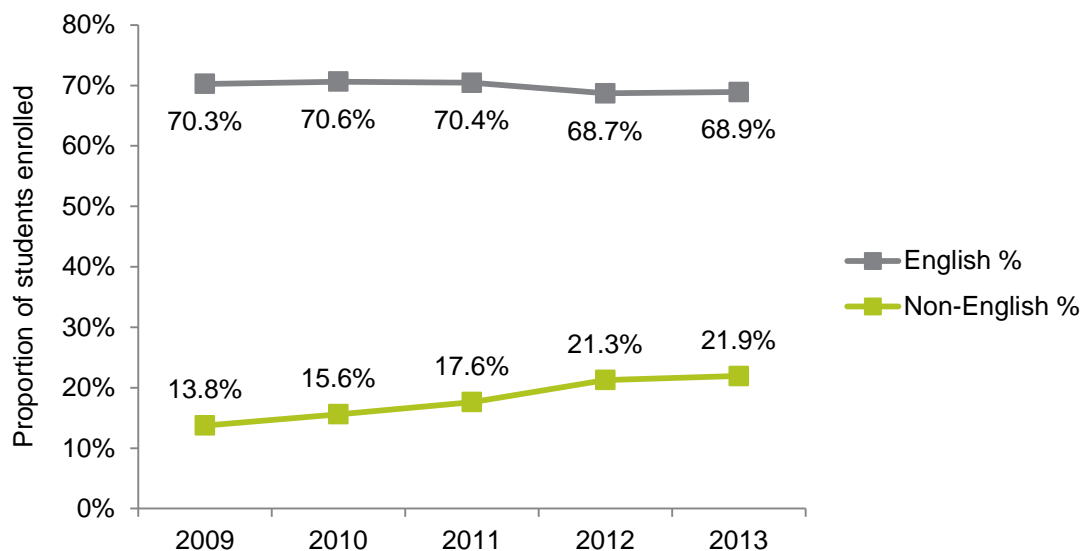
Study mode	2009		2010		2011		2012		2013	
	Number	Proportion (%)	Number	Proportion (%)	Number	Proportion (%)	Number	Proportion (%)	Number	Proportion (%)
Full-time	7,601	38.0	8,471	38.2	10,618	42.1	12,013	42.4	12,460	40.1
Part-time	12,406	62.0	13,716	61.8	14,576	57.9	16,318	57.6	18,604	59.9
Total	20,007	100	22,187	100	25,194	100	28,331	100	31,064	100

Note: Full-time and part-time study modes are based on hours of delivery, with any student undertaking 540 or more hours a year regarded as full-time.

Source: National Centre for Vocational Education Research National VET Provider Collection, 2010 – 2013.

The percentage of students who speak a language other than English at home enrolling in diploma-level qualifications has increased steadily, as shown in Figure 8.

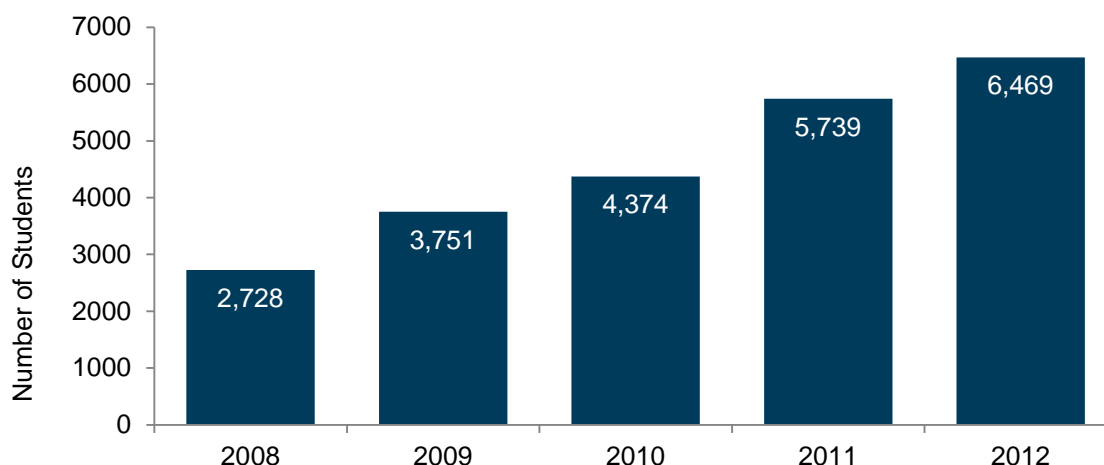
Figure 8: Proportion of students enrolled in diploma level children’s services/early childhood education and care qualifications by main language spoken at home



Source: National Centre for Vocational Education Research National VET Provider Collection, 2010-2013.

There has also been a steady rise in the number of qualifications completed at the diploma level, as shown in Figure 9.

Figure 9: Diploma-level children’s services/early childhood education and care qualifications completed, by calendar year, 2008–2012



Source: National Centre for Vocational Education Research National VET Provider Collection, 2008-2013.

Of note is the enormous gap between the number of students enrolling in early childhood education and care qualifications each year and the number of qualifications completed. In addition, the comparison between funded data (described above) and total effort indicates the amount of fee for service training activity that is occurring.

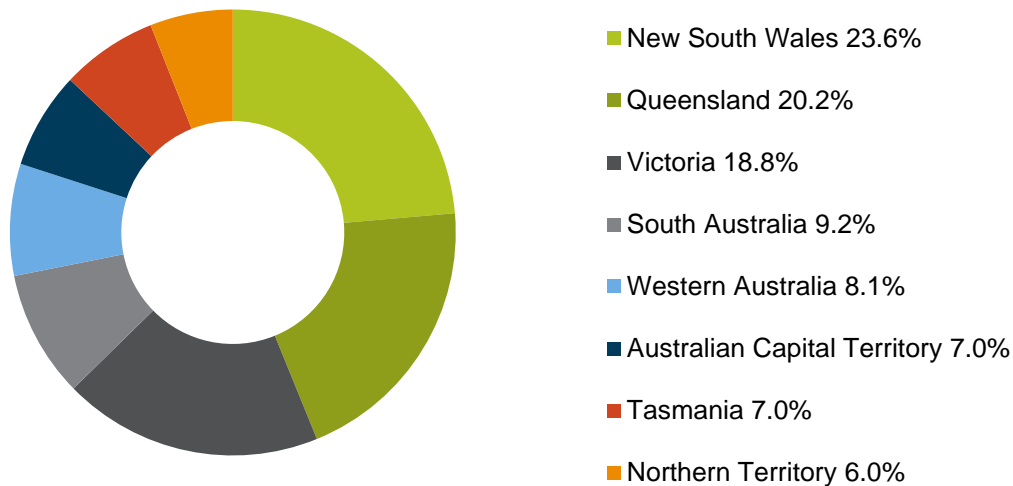
3.4 Profile of surveyed RTOs

Of the 321 RTOs registered to provide early childhood education and care qualifications, 289 reported that they were actually providing early childhood education and care training and assessment services in either the certificate III or diploma qualifications in May 2014 (when ASQA issued the survey for this review). The survey was issued to all 289 RTOs and there was a 100 per cent response rate; however, not all respondents provided responses to all questions.

Delivery profile

The percentage of ASQA-regulated RTOs, by the state or territory location of their head office (as at 4 July 2014) is shown in Figure 4 (page 25). In May 2014, the 289 RTOs surveyed were asked to provide additional information about the states and/or territories in which they were providing training and assessment services in early childhood education and care. Early childhood education and care training and assessment services are predominately occurring in Queensland and New South Wales, followed by Victoria, as shown in Figure 10.

Figure 10: Proportion of surveyed RTOs in each state or territory



Source: ASQA survey

Of these 289 RTOs:

- 192 stated that they were delivering the *CHC30113 Certificate III in Early Childhood Education and Care*.
- 159 stated that they were delivering the *CHC50113 Diploma of Early Childhood Education and Care*.
- 88 RTOs indicated that they were not delivering either of these qualifications at the time of the survey.
- 91 RTOs indicated that they intended to apply to ASQA to add *CHC30113 Certificate III in Early Childhood Education and Care* to their scope of registration.
- 89 RTOs indicated that they intended to apply to ASQA to add *CHC50113 Diploma of Early Childhood Education and Care* to their scope of registration.

Enrolments in each qualification

The 289 RTOs were asked to indicate how many enrolments they had in each of the certificate III and diploma qualifications in early childhood education and care. For the certificate III enrolments, the response rate was 73.9% and for the diploma enrolments, the response rate was 87%. As shown in Table 9, 33 RTOs informed ASQA that they had 1194 students enrolled in the *CHC30708 Certificate III in Children's Services*—which had been superseded by *CHC30712 Certificate III in Children's Services*, and had expired on 6 November 2013. All RTOs should by this time have transitioned all current students in the *CHC30708 Certificate III in Children's Services* to the later qualification *CHC30712 Certificate III in Children's Services* or the *CHC30113 Certificate III in Early Childhood Education and Care*. This indicates that RTOs are not transitioning students to current qualifications in a timely manner.

As shown in Table 9, 30,474 (69.8%) of students enrolled in certificate III early childhood qualifications were in the two superseded qualifications, and 17,440 (57.7%) of those enrolled in a diploma in early childhood were in the superseded qualification.

Table 9: Total number of enrolments by qualifications

Qualification	Number of enrolments
<i>CHC30708 Certificate III in Children's Services</i> (superseded)	1194
<i>CHC30712 Certificate III in Children's Services</i> (superseded)	29,280
<i>CHC30113 Certificate III in Early Childhood Education and Care</i>	13,199
TOTAL certificate III	43,673
<i>CHC50908 Diploma of Children's Services (Early childhood education and care)</i> (superseded)	17,440
<i>CHC50113 Diploma of Early Childhood Education and Care</i>	12,785
TOTAL diploma	30,225
TOTAL combined	73,898

Source: ASQA survey

Of the 289 RTOs surveyed, the majority of RTOs had 51 or fewer students enrolled in certificate III or the diploma qualifications, as shown in table 10. Of the certificate III qualifications, there were 29 RTOs that had fewer than 10 enrolments, but there were five RTOs that had more than 1000 enrolments. For the diploma qualifications, 189 RTOs had a small number of student enrolments with 149 RTOs with fewer than 20 enrolments and 129 with less than 10 student enrolments. However, there was one RTO with 2606 enrolments.

Table 10: Number of RTOs with student enrolments in certificate III or diploma

Qualifications	Student enrolments										Total RTOs
	0-20		0-50		51-250		251-500		501-3000		
	No. of RTOs	% of RTOs	No. of RTOs	% of RTOs	No. of RTOs	% of RTOs	No. of RTOs	% of RTOs	No. of RTOs	% of RTOs	
Certificate III	111	38.4	47	16.3	79	27.3	29	10.0	23	8.0	289
Diploma	149	51.6	37	12.8	67	23.2	20	6.9	16	5.5	289

Source: ASQA survey

Delivery mode used

Surveyed RTOs were asked to outline the mode used in the course delivery, including:

- the percentage of qualifications issued in 2013 that included recognition of prior learning processes
- the percentage of training delivered online
- the percentage of assessment delivered online
- the percentage of training in the workplace, and
- the percentage of assessment in the workplace.

Recognition of prior learning

In terms of recognition of prior learning, on average, across the certificate III–level qualifications:

- 39.8% of RTOs used some recognition of prior learning in 20% or less of all qualifications issued, and
- 36.7% did not use recognition of prior learning processes.

Across the diploma level qualifications, on average:

- 32.5% of RTOs used some recognition of prior learning in 20% or less of all qualifications issued, and
- 21.8% of RTOs did not use any recognition of prior learning for any children’s services qualifications issued.

In terms of current qualifications (*CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care*) there is more recognition of prior learning occurring at the diploma level than at the certificate III level.

Online delivery and online assessment

At certificate III level:

- 56.7% of RTOs surveyed did not deliver online training
- only one RTO used online training for 100% of the qualification
- most RTOs (61.6%) did not use any online assessment in any qualifications issued
- one RTO (0.3%) of those surveyed included online assessments as part of or all of the assessment for 100% of qualifications they issued, and
- 1.3% of surveyed RTOs used online assessment in 61% or more of qualifications they issued.

At diploma level:

- 43.9% of RTOs surveyed did not provide any training online
- three RTOs (or 1% of RTOs surveyed) delivered 100% of their training online
- almost half of the RTOs surveyed (48.4% or 140 RTOs) do not conduct any diploma assessments online
- fewer than 15% of RTOs surveyed use online assessments for 20% or less of the assessments they conducted
- only two RTOs (0.7%) rely on 100% of assessments online, and
- four RTOs rely on online assessments 90% of the time or more.

More training and assessment is conducted online for diploma-level qualifications than for certificate III level.

Workplace training and assessment

At certificate III level, survey results in relation to workplace training indicated that:

- 20.4% of RTOs surveyed did not do any training in the workplace for any qualifications issued
- 29.4% of RTOs utilised the workplace for between 1% and 20% of training for the qualifications they issued, and
- 19.0% of RTOs surveyed did more than 40% of training in a workplace for the qualifications they issued.

Survey results in relation to workplace assessment at the certificate III level indicated that:

- 16 RTOs (5.5% of RTOs surveyed) conducted one or more assessments in a workplace for all qualifications issued
- 17.6% of RTOs surveyed conducted between 41% and 60% of their assessments in a workplace
- 21.8% of RTOs surveyed conducted between 21% and 40% of their assessments in a workplace, and
- 31 RTOs (10.7%) conducted no assessments in a workplace (raising questions about how they intended to meet the requirements of the Community Services Training Packages in terms of assessment [refer to Chapter 5, Assessment]).

At diploma level, survey results showed the majority of training is not conducted in a workplace:

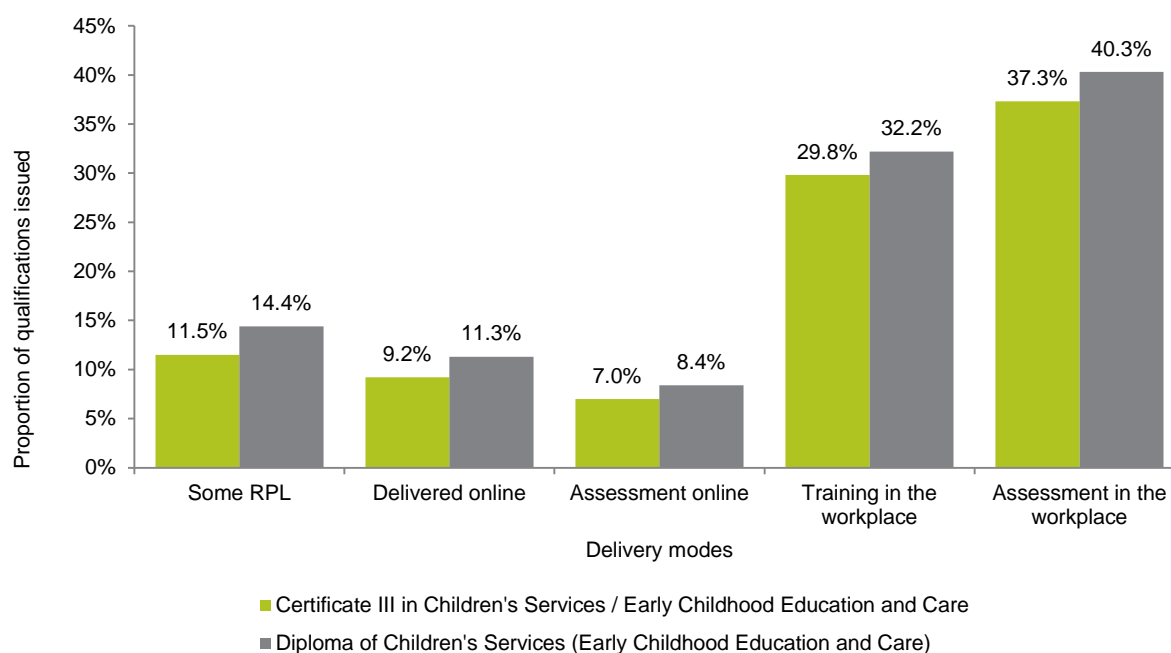
- 3.1% (or nine) of the RTOs surveyed conducted 100% of their training in a workplace
- 12.8% of RTOs surveyed conducted 61% or more of their training in a workplace, and
- 16.6% of RTOs did not conduct any training in a workplace.

Also at diploma level, the survey results relating to workplace assessment indicated:

- 17 RTOs (5.9%) conducted 100% of assessments in a workplace
- 46 RTOs (15.9%) conducted more than 60% of assessments in a workplace
- 118 RTOs (40.8%) conducted 40% or less of their assessments in a workplace, and
- 24 RTOs (8.3%) did not conduct any assessments in a workplace—which again raises the question of how they intended to meet the requirements of the Community Services Training Packages in terms of assessment (refer to the section on 'Assessment' in Chapter 5).

The specific delivery modes used for the certificate III and diploma level qualifications are shown in Figure 11.

Figure 11: Delivery mode used, by qualification



Source: ASQA survey

Course duration

To better understand how RTOs were meeting the requirements of the AQF in terms of duration or volume of learning for certificate III and diploma level qualifications, ASQA surveyed RTOs about target group(s) and duration or volume of learning in weeks and hours.

The AQF (2013) defines 'volume of learning' as a duration measure which is linked to the complexity of a qualification. The AQF Council, in its explanation of volume of learning, states that

The volume of learning allocated to a qualification should include all teaching, learning and assessment activities that are required to be undertaken by the typical student to achieve the learning outcomes. These activities may include some or all of the following: guided learning (such as classes, lectures, tutorials, on-line study or self-paced study guides), individual study, research, learning activities in the workplace and assessment activities.

(Australian Qualifications Framework Council 2014, p. 2)

Under the requirements of the AQF, the duration of a certificate III or a diploma is typically between one to two years, a notional duration including all learning activities. Educational participation is accepted as 1200 hours per full-time year (Australian Qualifications Framework Council 2014).

Under the AQF, accrediting bodies, qualification developers and issuing bodies (including RTOs) are required to meet the qualification specifications in the AQF.

Under the VET Quality Framework, RTOs are required to meet the requirements of the AQF. RTOs are therefore responsible for ensuring that the programs they design meet these requirements. From 1 January 2015, all new enrolments must be in qualifications that meet the requirements of the AQF (Australian Qualifications Framework Council 2014).

A major concern related to volume of learning is that excessively short course delivery leads to poor quality outcomes. Such timeframes 'cannot deliver the rigour or depth of training and competency required by industry' (Halliday-Wynes and Misko 2013). It is essential in the early childhood education and care sector (as in other industries) that learners:

- gain the required competencies, and
- are rigorously assessed so that they can demonstrate the necessary skills and knowledge.

Insufficient time devoted to training and assessment will inevitably lead to poor outcomes. There are of course circumstances where people with prior experience in the early childhood education and care sector would be able to demonstrate the required competencies and gain a qualification in a shorter period. However, it would not be appropriate for people with no prior experience to be 'fast-tracked' through a training program.

Surveyed RTOs were asked to describe their target group (of students) according to three categories:

- **Inexperienced** (no prior early childhood education and care experience, for example: school students, school leavers, new migrants)
- **Experienced** (for example: existing workers, people returning to work with prior early childhood education and care experience), or
- **Unrestricted** (the course was designed with no target group in mind).

For each group, the RTOs were asked to provide details regarding the:

- total number of weeks for work-based traineeship³
- total number of course hours (including classroom plus workplace hours)
- total classroom hours only, and
- total workplace hours only.

Of the RTOs surveyed, those delivering certificate III qualifications had designed course durations that varied according to different levels of experience of the target group (that is, experienced or inexperienced). However, where the target groups were less defined (e.g. unrestricted), which could mean a mix of levels of experience, the course durations designed were less than for the other target groups.

³ Traineeships are a structured training arrangement for a person employed under a traineeship training contract. It usually involves the person receiving training and being assessed both on and off the job.

Table 11: Summary of course duration, certificate III

Qualification	Average total number of weeks for work based traineeship	Average total number course hours (including classroom plus workplace hours)	Average total classroom hours only	Average total workplace hours only
CHC30708 Certificate III in Children’s Services				
Experienced	65	781	277	505
Inexperienced	69	792	303	481
Unrestricted	53	550	379	140
CHC30712 Certificate III in Children’s Services				
Experienced	54	732	212	529
Inexperienced	50	714	272	408
Unrestricted	43	648	330	230
CHC30113 Certificate III in Early Childhood Education and Care				
Experienced	57	771	230	501
Inexperienced	101	1412	657	625
Unrestricted	51	695	341	234

Source: ASQA survey

Note: Level of response for diploma was insufficient to include.

For the certificate III, the course durations designed by the surveyed RTOs varied from as little as one to six weeks, up to 104 weeks or more. The majority of RTOs had designed courses with significantly less duration than the one to two years that is recommended by the AQF, as shown in Tables 11 and 12.

Table 12: Variation of course duration in weeks, certificate III

Total number of weeks for work-based traineeship for certificate III–level* children’s services qualifications		
	Number of RTOs [†]	Proportion of RTO respondents (%)
104 weeks or more	25	11.7
52 weeks – 103 weeks	35	16.4
26 weeks – 51 weeks	111	51.9
13 weeks – 25 weeks	31	14.5
6 weeks – 12 weeks	1	0.5
1 week – 5 weeks	11	5.1
Total	214	100

Source: ASQA survey

* Certificate III level qualifications combined: *CHC30708 Certificate III in Children’s Services* (superseded), *CHC30712 Certificate III in Children’s Services* (superseded) and *CHC30113 Certificate III in Early Childhood Education and Care*

† 75 providers did not provide a response

Given that 1200 hours is the benchmark for a full-time year, the findings of the survey indicated that, again, the majority of RTOs designed courses to achieve an AQF certificate III qualification with significantly fewer hours than those recommended by the AQF, as shown in Table 13.

Table 13: Variation of course duration in hours, certificate III*

Total number course hours (including classroom plus workplace hours) for certificate III-level* children's services qualifications		
Duration	Number of RTOs[†]	Proportion of RTO respondents (%)
2001 – 4000 hours	8	3.3
1001 – 2000 hours	24	9.8
751 – 1000 hours	33	13.4
501 – 750 hours	88	35.8
251 – 500 hours	71	28.9
1 – 250 hours	22	8.9
Total	246	100

Source: ASQA survey

* Certificate III level qualifications combined: *CHC30708 Certificate III in Children's Services* (superseded), *CHC30712 Certificate III in Children's Services* (superseded) and *CHC30113 Certificate III in Early Childhood Education and Care*

† 43 Providers did not provide a response

The balance between classroom hours and workplace hours was also explored through the survey. RTOs delivering the certificate III qualifications varied in their course design, emphasising either classroom-based delivery or workplace delivery. There were 130 RTOs that had workplace hours of between 151 and 250 hours, and there were 76 RTOs that had between 251 and 500 hours for classroom delivery, as shown in Table 14.

Table 14: Variation of duration of classroom and workplace hours, certificate III*

Duration	Total classroom hours only		Total workplace hours only	
	Number of RTOs [†]	Proportion of RTO respondents (%)	Number of RTOs [‡]	Proportion of RTO respondents (%)
More than 1000 hours	0	0	17	7.9
501 – 1000 hours	26	13.7	16	7.4
251 – 500 hours	76	40.0	22	10.2
151 – 250 hours	42	22.1	130	60.5
101 – 150 hours	19	10.0	20	9.3
41 – 100 hours	20	10.5	6	2.8
1 – 40 hours	7	3.7	4	1.9
Total	190	100	215	100

Source: ASQA survey

* Certificate III level qualifications combined: *CHC30708 Certificate III in Children’s Services* (superseded), *CHC30712 Certificate III in Children’s Services* (superseded) and *CHC30113 Certificate III in Early Childhood Education and Care*

† 99 providers did not provide a response for classroom hours

‡ 74 providers did not provide a response for workplace hours

For the diploma qualifications, the course durations designed by the surveyed RTOs varied from significantly fewer than 500 hours to more than 2001 hours. The majority of RTOs designed courses to achieve a diploma qualification with significantly fewer hours than the 1200 hours required under the AQF, as shown in Table 15.

Table 15: Variation of course duration in hours, diploma*

Duration [†]	Number of RTOs [‡]	Proportion of RTO respondents (%)
2001 – 4000 hours	20	9.8
1501 – 2000 hours	30	14.7
1001 – 1500 hours	80	39.2
751 – 1000 hours	20	9.8
501 – 750 hours	26	12.7
1 – 500 hours	28	13.7
Total	204	100

Source: ASQA survey

* Diploma level qualifications combined: *CHC50908 Diploma of Children's Services (Early Childhood Education and Care)* and *CHC50113 Diploma of Early Childhood Education and Care*.

† Total number of course hours (including classroom plus workplace hours)

‡ 85 providers did not respond

RTOs delivering the diploma qualifications varied in their course design, emphasising either classroom-based delivery or workplace delivery. At the diploma level there were 74 RTOs that had between 101 and 150 hours of workplace delivery, while 40 providers had between 501 and 1,000 hours of classroom delivery, as shown in Table 16.

Table 16: Variation of duration of classroom and workplace hours, diploma*

Duration	Total classroom hours only		Total workplace hours only	
	Number of RTOs [†]	Proportion of RTOs (%)	Number of RTOs [‡]	Proportion of RTOs (%)
1001 – 2000 hours	23	16.1	14	8.3
501 – 1000 hours	40	28.0	15	8.9
251 – 500 hours	39	27.3	22	13.0
151 – 250 hours	9	6.3	38	22.5
101 – 150 hours	18	12.6	74	43.8
41 – 100 hours	12	8.4	3	1.8
1 – 40 hours	2	1.4	3	1.8
Total	143	100	169	100

Source: ASQA survey

* Diploma qualifications combined

† 146 providers did not provide classroom hours

‡ 120 providers did not provide workplace hours

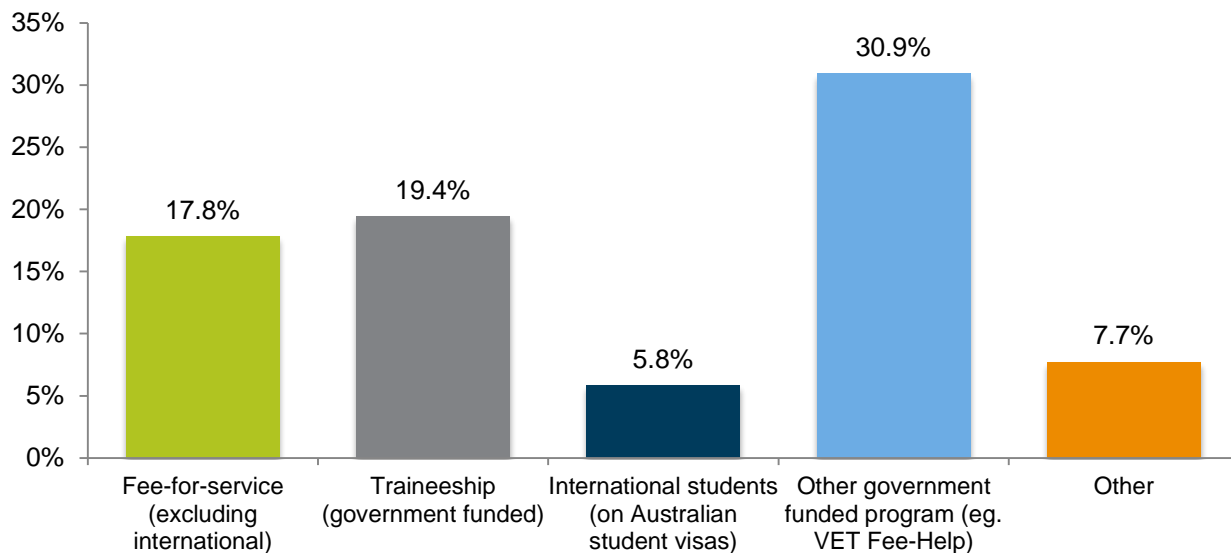
3.6 Funding

The *National Agreement for Skills and Workforce Development* is an agreement between the Australian and state and territory governments, and is a schedule to the Intergovernmental Agreement on Federal Financial Relations (Council of Australian Governments 2012). The agreement identifies the long-term objectives of the Australian and state and territory governments in the areas of skills and workforce development, and also recognises the interest of all governments in ensuring the skills of the Australian people are developed and utilised in the economy. The agreement does not prescribe how each state and territory shall target their funds for workforce development; it is up to each individual state and territory to determine. Funding for vocational education and training courses can come from both Australian or state and territory governments, and can be linked to a range of initiatives at a national or state and territory level.

To gain a better understanding of the nature of funding for the early childhood education and care qualifications, ASQA sought information from RTOs through the survey. RTOs were asked what percentage (%) of students was enrolled in early childhood education and care training as represented by the following groups: fee-for-service (excluding international), traineeship (government funded), international students (on Australian student visas), and other government-funded programs (for example, VET FEE-HELP).

The findings indicate that just on half of the students were funded through government programs (50.3%), while 17.8% were enrolled through fee-for-service, excluding international students. Refer to Figure 12.

Figure 12: Proportion of students* enrolled by tuition type

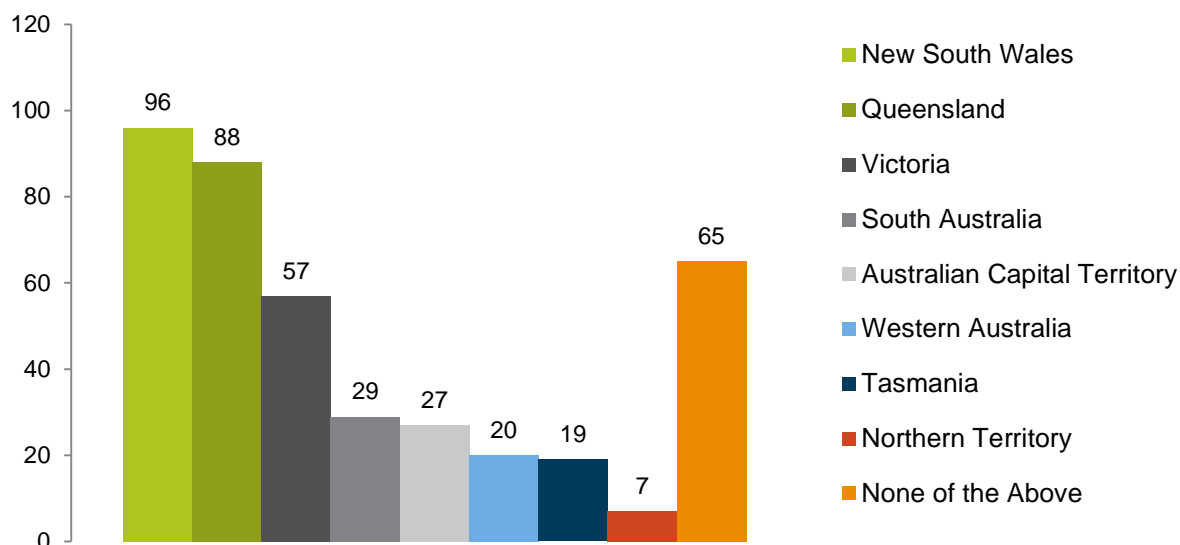


Source: ASQA survey

*18.4% did not respond to this question

In the survey, RTOs were asked to detail which states and/or territories they had traineeship contracts with. Of the respondents (98.3%) who provided details, the findings indicate that the majority of RTOs had contracts with New South Wales (96 RTOs), Queensland (88 RTOs) and Victoria (57 RTOs). Refer to Figure 13.

Figure 13: RTO traineeship funding contracts by state or territory



Source: ASQA survey

Chapter 4 Stakeholder perspectives

As outlined in Chapter 1, the genesis of this strategic review was the Productivity Commission's November 2011 report *Early Childhood Development Workforce*. The Terms of Reference for that report required that 'the Commission ... consult widely with relevant professional and interested parties' (p. VII). The Commission received 368 submissions and conducted meetings with 'a range of organisations and individuals' (p. 397). These consultations provided the Productivity Commission with a wealth of information and opinion for analysis.

A similar strategy has been utilised for this strategic review of early childhood education and care training. An important element in this review has been intensive consultation with stakeholders to obtain their perspectives on training for this industry area. As part of the review methodology, ASQA sought the views of stakeholders through methods including:

- a survey of RTOs
- industry roundtable meetings with employers and RTOs
- consultation with state and territory education/skills departments
- stakeholder interviews during the strategic audit process (including with RTO managers and trainers, students and sector employers), and
- a review of early childhood education and care-related complaints submitted to ASQA.

4.1 Stakeholder consultations

The views of these parties have been summarised according to specific concerns. These concerns relate to:

- course duration
- assessment
- workplace experience
- distance, including online courses
- the training package
- funding, and
- family day care.

A summary of complaints to ASQA is addressed separately in Section 4.2.

Course duration

A number of submissions to the Productivity Commission (2011) complained that much of the training for this sector is short or 'fast track', providing insufficient opportunities for students to learn, reflect and demonstrate competence. Submissions expressed concern that students completing these short courses would not be equipped to find work. ASQA found this concern echoed during these stakeholder consultations.

Employers commented that 'short courses lead to poor delivery and poor outcomes' and that 'graduates from short courses may not get work'. One employer commented that 'fee-for-service students were not as good as trainees, as they did not spend enough time in the workplace'.

In the RTO survey, one RTO neatly summarised a view expressed by several:

This review should inform decisions made in relation to the legislating of delivery time, modes and content for early childhood qualifications. This will eliminate the competitive nature of training and give the end users real choice to seek quality versus duration. It has been a long time concern that RTOs are able to deliver training in modes that are too short for quality outcomes.

Some RTOs welcomed the revised training package for its inclusion of minimum mandatory work placement hours, as these would support longer course duration. Selected comments are included below.

The new qualification offers a robust level of training and assessment with appropriate durations.

It is good to make the benchmark clear to all RTOs.

The volume of learning and subsequent demonstration of skills and knowledge that needs to take place ... cannot be adequately done by inexperienced students in the short timeframe that some RTOs offer.

The volume of learning for a qualification should be benchmarked.

A summary of the findings related to course duration for the sampled RTOs is provided in Chapter Five.

Assessment

The Productivity Commission's *Early Childhood Development Workforce* report (2011) recommended that a revised training package should have 'rigorous auditable assessment requirements' (p. xlvii). Consultation with industry stakeholders revealed a common perception that the assessment of skills—in order to produce competent workers for the child care industry—is not occurring. In consultation with state and territory officials, one official commented that 'learners are not always "job ready" on completion of training'.

Comments from the roundtable discussions with sector representatives included that 'RTOs are letting students and employers down by not doing assessment properly'.

During this review, employers were contacted for their views on training and assessment, and these included reflections on their own role in training and assessment. These employers were providing work placements for students, and were expected to assist with the assessment of these students. A general perception held by this group was that RTOs expected employers to do most of the assessment, with infrequent visits from the RTO assessor.

One employer commented on the RTO's role in assessment, stating that only one visit had been made by the RTO assessor during the entire work experience course. Many employers commented that practical tasks were never observed by assessors, with the workplace supervisor doing the only 'sign off'. In the rare cases reported where assessors completed the assessments within the workplace, the employers commented on this as a 'quality experience'.

The following comments are indicative of the common assessment-related complaints raised by employers:

Assessments which employers were commonly asked to complete were 'tick a box', and were often not readily 'observable'. One employer asked, how can I determine if a student is 'working within an ethical framework'?

Is online assessment appropriate?

The assessor visited twice in six months, and observed and assessed the student only at those visits.

Students are signed off [as competent] too soon. It is having a huge negative effect on the industry. The assessment process needs to be improved to make sure the students have the skills before they are signed off.

Some assessors just want to tick a box.

All assessments are written.

Twenty per cent of students who have completed the course are not fully competent. There should be more intense, regular visits towards the end of the program.

Students who were interviewed during the review also had some negative comments about assessment, examples of which are quoted below:

I was told at induction that the RTO does not do RPL. I am 57 years old and have been in the industry for 19 years. I did not get any recognition of my experience. No-one from the RTO visited me [in the four months of the course]. Unless I find an RTO that does RPL, I am not going to do the diploma.

All the assessment questions are very similar.

The assessor only spent 20–30 minutes with me; my centre manager would not release me.

During the 30 randomly sampled audits, RTO representatives reflected more positively on their assessment practices and strategies in workplaces.

Our assessors visit workplaces every 10 weeks for two to two-and-a-half hours, predominantly to observe students.

One summarised succinctly RTO concerns about expectations related to assessment:

It is unrealistic for all assessment to be done in the workplace by RTO assessors. Employers can participate in assessment through appropriate third-party reports.

One RTO commented that assessment in the workplace was unrealistic for students living in remote and rural areas, 'assessment of some skills and knowledge can occur in scenarios and out of workplace situations'.

There appears to be no commonality in how many assessment visits are made by RTO assessors to complete assessments in the workplace. Some RTOs reflected on the expense of doing workplace assessment. A trainer in one RTO commented that 'only one assessment visit to the work placement is made for a certificate III student'. The lack of a common standard may be exacerbated by the different requirements of funding bodies. One state has removed the requirement for RTOs to visit trainees in the workplace from its training plan requirements.

There is also no common understanding emerging from stakeholders on what assessment in a workplace actually means. Stakeholders presented a range of views on this topic.

At one end, stakeholders believe that assessors do not need to visit the workplace—sufficient evidence of student skills can be obtained by students compiling the evidence, the assessor reviewing it at the RTO and the workplace supervisor completing third-party reports. A variation on this view is that technology (such as head-mounted cameras) can record skills and assist assessment decisions.

The opposing view is that the literal meaning of 'assessment in the workplace' is that someone with the skills and knowledge of an assessor, as required in the Standards, directly observes the student in the workplace and makes a decision whether the performance meets the standard. Within this viewpoint there are a range of views as to how many assessor visits are necessary, ranging from only once to more frequently.

Workplace placement

Most stakeholders see the value of work placement for learners—it assists them to understand the realities of the workplace and to develop skills and knowledge to equip them for the workplace. Some workplace experience is required by both the CHC08 Community Services Training Package and CHC Community Services Training Package. The minimum quantum has been specifically defined in the current CHC Community Services Training Package (release 2013).

Most RTOs included in the strategic review audit sample considered work placement as essential in their training and assessment strategies. However, as reflected in Chapter Five, for Standards 16.4 (Standards 1.5 and 1.6 of the 2015 Standards) (engagement with employers), very few RTOs could demonstrate adequate engagement with employers to clearly define the parties' responsibilities and expectations.

In the sector roundtable meetings, employers expressed a common view that there should be a variety of work placements, that trainers and assessors should be visiting the workplace (but are not), and that more support is needed from RTOs for workplace supervisors. One employer summarised this need for additional support as follows, 'a quality experience for employers would include assessment visits by RTOs during which they mentor, assess, and consult with centre staff'. Another employer made the positive comment that one RTO provided three days of training for the employer on how each party could contribute to quality learning outcomes.

Through the interviews with employers during the randomly sampled audits, the following matters were raised:

- Students are not properly prepared for their workplace experience by their RTO. One employer commented that 'generally students have no knowledge of what really happens in the work placement'. This was quite a common theme; that the employer had no idea what skills students had already acquired, or what they as the employer needed to do. One employer stated that 'we were not given information on where the students were up to in their skills development. This meant that we could not properly support them'. Another said that she had to rely on an initial interview with the student to establish what she had achieved.

The students weren't prepared when they came in. They did two to three weeks full-time training and were thrown out into the centres with no concept of what it was about, what was required.

- There was a common thread of employer dissatisfaction with many RTOs. Employers find that some RTOs in their area provide support to placement students, others provide next to none.

The trainees I have were originally signed up to [RTO X], but due to poor service from [RTO X] I cancelled that arrangement and now the students are receiving their qualification from another provider. [RTO X] was unsatisfactory, it appeared to have too many students, almost never visited, lost student assignments, took too long to mark them, and never responded to phone calls.

It varies between training providers as to how well prepared the students are for their placement. There are certain training providers that I would not employ someone trained by them. The names of these places are relatively established in the industry. I sympathise with the students.

Employers generally reported that there were insufficient workplace visits by RTOs. One employer commented 'the RTO should visit at least once per term'⁴. Another stated that 'we have not seen a trainer (assessor) in two years in the workplace'.

Some employers were very happy with the quality of RTOs' interaction with them, 'Our RTO sits down with us and determines what our centre needs and how the training will be conducted. One of the RTO's trainers actually works part-time in the centre'. However, another commented, 'I was not given any training regarding hosting students. I was not made aware of my responsibilities to the students'.

Most employers interviewed commented positively on the skills and knowledge students acquired during the work placements. Some positive comments by employers are quoted below:

The students are well-matched to the job roles. The RTO provides a briefing and debriefing for practical assessments. Assessments are in real time.

The RTO provides an orientation pack for work placement.

Employers also commented that the literacy levels of students were low:

It is very common to have LLN [language, literacy and numeracy] issues. We have significant education laws in English. They need to be able to verbally communicate with children and parents.

It is hard because some students lack language skills. For example they do not understand clean up requirements. If you ask a student to bring a bucket, they don't understand. It makes it difficult when students have to interact with children, because neither understands each other.

⁴ The RTO in this instance conducted only written assessments.

During the randomly sampled audits, RTO representatives were asked to comment on work placements for early childhood education and care learners. RTO representatives frequently expressed concern relating to the difficulty in finding appropriate work placements:

Industry is flooded with students needing work placements.

There is now a level playing field regarding the requirements for work placements.

It is difficult to find child care centres that are appropriate and reinforce quality.

It is hard to get employers to release students for study.

One quality RTO indicated that 'we are dropping these qualifications from our scope'. (The main reasons given were funding difficulties, regulatory requirements, low completions, difficulty finding work placements).

More employers are taking university students instead of VET students.

Students who had completed their training were also interviewed during the strategic review and noted that quality experiences included the assessor visiting fortnightly, provision of feedback on assessor observations, and having a mentor identified on centre staff. However, some students commented that they had to find their own work placement:

I would have preferred they [assessors] came out [to the workplace] more often.

I am only doing the course because I have to [a job seeker].

We had to find our own work placements.

Trainers interviewed during the strategic review raised a common concern with work placements, which is that employers do not always allow students to handle babies (due to work health and safety issues). CHCECE005 *Provide care for babies and toddlers* is a core unit in the certificate III. This issue is raised in Chapter 6 in relation to access to suitable resources, facilities and range of contexts.

Trainers also reflected on best practice, relating to when and how often to visit students in the workplace, with one trainer stating:

On average it can take anywhere from an hour to two or three hours depending on student's needs. When doing a final assessment task it can be two to three hours. It can take a minimum four to six weeks or even longer to deliver [training] and then go out to conduct assessment. At times it's inappropriate to be doing certain [assessment] tasks and other times I have to wait until students are scheduled to do it. It's not about doing it once.

Distance learning, including online courses

A number of the RTOs audited for this review indicated that they delivered most of, or all, of the early childhood education and care course through a distance, including online, delivery mode. One RTO that provides all its training online relied on workplace supervisors to complete assessments, with telephone access to the RTO. Another RTO commented that it is moving to 100% delivery of courses online.

One RTO surveyed requested that ASQA 'should especially focus on online delivery of these qualifications'. The RTOs sampled for this review were selected randomly.

One RTO stated that it had received federal money to provide e-learning⁵, but added that 'the sector did not find it appropriate, 'e-learning is not for all industry sectors'. Similar concerns relating to online learning were raised in submissions to the Productivity Commission mentioned in the *Early Childhood Development Workforce* report (2011, p. 264) including:

- concern over how practical assessment is carried out
- concern that online training is not appropriate for all learners (for example, those with poor language, literacy and numeracy skills), and
- concerns over resource implications for online learning.

Training package

While most stakeholders commented positively on the 2013 CHC Community Services Training Package, some common criticisms were also noted. Some employers noted that training packages in general are changing too frequently—even though the context for achieving the same competency has not changed.

The Community Services and Health Industry Skills Council ran a series of workshops on the new CHC Community Health Care Training Package. Despite this, the level of non-compliance at audit identified that many RTOs had not implemented the requirements of the new training package, which include:

- developing learning and assessment strategies
- sourcing adequate resources including work placements, and
- mapping to identify any trainer and assessors training needs.

There were both positive and negative comments from RTO representatives concerning the 2013 training package. The positive comments from RTO representatives focused on the updating of the qualifications to reflect changes to regulations, and the higher standards perceived in these qualifications, including:

The change in curriculum [sic] has been welcomed and is easier to work with compared to the CHC08 [Community Services Training Package] curriculum [sic].

The new CHC50113 [Diploma of Early Childhood Education and Care] and CHC30113 [Certificate III in Early Childhood Education and Care] suit the industry requirements much better.'

The biggest change is the practicum, and the requirement to be assessed on a licensed site.

⁵ E-learning is the use of electronic media, educational technology and information and communication technologies in education.

The standard and quality of the qualification is higher.

The new qualifications are much more relevant to the industry.

The negative comments from RTO representatives covered a range of matters, including the timing, complexity and content of the qualifications. RTO representatives also commented that there are too many changes to training packages:

The [strategic] review should have come after the new training package was implemented. I am concerned about the timing of this review. It should have occurred after RTOs had the opportunity to implement it.

Four changes to the package in 12 months is very challenging and costly. The impact here is that state funding bodies do not keep up with funding of the most recent package.

There should be fewer changes to the qualifications. There are too many in too short a time.

It is difficult to maintain the courses [being offered] because there are too many changes in the package.

Transition to the CHC Community Services Training Package has been difficult for some RTOs. The reasons provided include:

- 'the lack of training materials available'
- not being aware 'that the new certificate had been registered', and
- 'no mapping of the new qualification to the old'.

One audited RTO commented that 'mapping of the old certificate III to the new diploma is impossible' as the RTO was embedding units of competency in the earlier version of the certificate III. Additional comments included:

It is unrealistic to expect for someone to enter into the diploma without any previous academic requirements or vocational experience. Employers prefer someone in their mid-20s at least. Entry requirements should be governed by a combination of qualifications and experience.

The new qualification is one of the poorest we have seen. Care for babies unit requires practical experience that is not available to students who do not work with babies. Services will not allow students who are not their employees to [work with babies].

RTO representatives expressed concern about the complexity and demands of the *Certificate III in Early Childhood Education and Care*. They listed the 'multiple barriers' some students face, especially migrants who have never been to school, who may have English language difficulties and/or cultural differences.

There were specific criticisms of the content and structure of the CHC Community Services Training Package:

There is duplication in the qualifications, a doubling up of content.

Nesting the certificate III units in the diploma is not a good idea. It reduces the timeframe to learn more. Putting people straight into the diploma may increase the drop-out rate and will require a higher IELTS [International English Language Testing System] level for international students, direct entry into the diploma.

I don't like the certificate III being embedded in the diploma. This does not value the cert III as a core qualification. The industry needs good quality workers. The change seems to be pushing everyone towards the diploma.

The wording in the package should be tighter—more 'musts'.

The new package is quite challenging—it is hard to create assessment tools to address the requirements.

With the new package we will move away from completing workbooks on theory, to using a bank of questions in the workplace assessments.

There are no mandated assessment duration requirements in the new package. Benchmarking a time for assessments would eliminate tick and flick.

It is too early to decide if the new package is an improvement. The new diploma is too long.

I think that a 120 hours and 240 hours [workplace requirement] is too low—it is a practical course.

The diploma should have entry requirements.

Trainers interviewed during the strategic review also provided comments on the CHC Community Services Training Package, both positive and negative.

Positive comments included:

The evidence side of things is quite clear [in the new package] about what is required.

The new package will force RTOs and employers to have a relationship [through workplace experience].

However, trainers also stated:

One document is preferred [for the unit of competency] not the separation with the new training package into the unit and assessment information.

Entry requirements should be retained in the new package, particularly an experience requirement for the diploma. To work as a director in a centre, you need experience, as well as a diploma.

Trainers should have current industry experience, of no more than three – four years old.

Trainers should have a requirement to complete professional development points.

The training package specifies students must do some things that centres won't allow.

The unit CHCECE017 Foster the holistic development and well-being of the child in early childhood is too huge and should be broken up.

The criteria in the units are not specific enough, for example, with three children.

Some students interviewed during the randomly sampled audits expressed discontent with the transition to the new CHC Community Services Training Package, and with the repetitive nature of the units of competency.

Funding

Some stakeholders raised concerns over the funding of early childhood education and care training courses.

In the industry roundtable consultation, one industry stakeholder stated 'funding is a driver of poor training'.

RTOs noted that funding affected the numbers of students enrolling, as 'a lot of students applied to do the diploma because it was funded'. Another RTO representative noted that there were differences between funding bodies (in regards to what is funded and for how long). This RTO noted that 'RTOs had to train and assess within three months, regardless of the Australian Qualifications Framework level'.

Family day care

Stakeholders reflected on family day care provision and the impact of the new CHC Community Services Training Package and National Quality Framework for Early Childhood Education and Care on the provision of training.

Since 1 January 2014, the National Quality Framework for Early Childhood Education and Care has required family day care educators to have a certificate III qualification (refer to Chapter 2 for details). Some trainers commented that some family day care educators have left the industry, 'particularly some with LLN [language, literacy and numeracy] issues'. Their view was that the content of the Community Services Training Package was too difficult for some family day care educators.

A further comment was that those working in family day care did not always have access to children across a range of ages. For existing workers, this has meant that some educators without access to babies, for example, have had to find a practicum elsewhere and pay a replacement educator to manage their business.

4.2 Complaints

ASQA accepts complaints about training providers from students, their representatives, and other members of the community.

When ASQA accepts a complaint, the ASQA Complaints Team reviews the information provided and conducts a risk assessment. ASQA may then:

- use the information provided in the complaint to inform future regulatory activity
- contact the provider to request a specific action, and/or
- undertake a formal investigation (in the most serious cases).

The outcomes of a formal investigation can include:

- a compliance audit of a provider's registration, which may lead to
- a decision to suspend, cancel or place conditions on a provider's registration.

ASQA categorises the issues raised within each complaint received about a provider. The five most frequently raised issues in complaints about training providers last financial year are shown in Figure 14.

Figure 14: Issues most frequently raised in complaints about training providers, 1 July 2013 – 30 June 2014



Source: Common issues complaints

While not all complaints are substantiated, high numbers of complaints regarding particular products are treated as an indicator of products of concern. Both the Certificate III in Children's Services and the Diploma of Children's Services (Early Childhood Education and Care) were identified as qualifications of concern.

There were 62 complaints received between 1 July 2013 and 30 June 2014 that related specifically to the early childhood education and care certificate III and diploma qualifications, as shown in Table 17.

Table 17: Complaints received across the early childhood education and care sector, 1 July 2013 – 30 June 2014

Qualification		Total
CHC30113	<i>Certificate III in Early Childhood Education and Care</i>	7
CHC30712	<i>Certificate III in Children's Services</i>	20
CHC30708	<i>Certificate III in Children's Services</i>	13
CHC30402	<i>Certificate III in Children's Services</i>	3
CHC50113	<i>Diploma of Early Childhood Education and Care</i>	1
CHC50908	<i>Diploma of Children's Services (Early Childhood Education and Care)</i>	15
CHC50302	<i>Diploma of Children's Services</i>	3
TOTAL Complaints		62

Source: ASQAnet 1 September 2014

Complaints received about early childhood education and care certificate III and diploma qualifications related to:

- quality of assessment
- issuance of certificates
- non-disclosure of fees
- marketing practices
- student suitability with regard to language, literacy and numeracy capability and/or support, and
- student records.

Of the 62 complaints received between 1 July 2013 and 30 June 2014, nine were substantiated or partially substantiated, seven were not substantiated, nine were withdrawn, 23 were not investigated due to not meeting ASQA's criteria for investigation, and 14 remain under investigation.

Chapter 5 Quality of early childhood education and care training and assessment

The findings of this strategic review reflect the findings of the audits of 77 RTOs, which ASQA conducted between January 2013 and May 2014. An overview and analyses of the outcomes of these audits are provided in this Chapter.

5.1 Overview of the standards

The strategic review focused on a selection of quality standards from the *Standards for NVR Registered Training Organisations 2012*. These standards are referred to as SNRs and were the national training standards in place at the time the audits were undertaken for this review. However, in late 2014, new standards—the *Standards for Registered Training Organisations 2015*—were introduced. The new standards applied to new RTOs from 1 January 2015 and to existing RTOs from 1 April 2015.

This review's focus was on standards relevant to the issues raised by the Productivity Commission in its 2011 report, and in particular, a subset of SNR Standard 15.

The review focused on:

- the strategies for training and assessment, including the student target group; whether the course is delivered in the workplace or classroom or in some other way; the duration of the course; and whether strategies were developed through 'effective consultation with industry' (SNR 15.2 [Standards 1.1, 1.4, 1.15 and 1.6 of the 2015 Standards])
- what staff, facilities, equipment and training and assessment materials the RTO uses to deliver the course (SNR 15.3 [Standards 1.3, 1.5 and 1.6 of the 2015 Standards])
- the qualifications of trainers and assessors, including their industry experience and vocational competence (SNR 15.4 [Standards 1.13, 1.14, 1.15 and 1.16 of the 2015 Standards])
- assessment material used by the RTO to determine student competence (SNR 15.5 [Standard 1.8 of the 2015 Standards])
- whether the RTO provided clear information to learners prior to enrolment (SNR 16.3 [Standards 5.1 and 5.2 of the 2015 Standards])
- how employers were involved in assisting with training and assessment of learners (SNR 16.4 [Standards 1.5 and 1.6 of the 2015 Standards])
- whether learners receive training, assessment and support services that meet their individual needs (SNR 16.5 [Standard 1.7 of the 2015 Standards])
- whether the RTO monitors training and/or assessment services provided on its behalf (SNR 17.3 [Standard 2.4 of the 2015 Standards])
- whether the RTO issues qualifications to persons who it has assessed as competent in accordance with various requirements (SNR 23.1 [Standards 3.1, 3.2, 3.2 and 3.4 of the 2015 Standards])
- whether the RTO ensures its marketing and advertising of AQF and VET qualifications is ethical, accurate and consistent with its scope of registration (SNR 24.1 [Standard 4.1 of the 2015 Standards]), and
- whether the RTO has managed the transition of superseded training packages and qualifications (SNR 25.1 [Standards 1.26 and 1.27 of the 2015 Standards]).

The standards selected were those that directly affect:

- the student (in terms of quality of information provided, support services and accuracy of qualification issued), and
- the quality of training and assessment provision (for example, standards relating to the suitability of the training and assessment strategy; access to suitable resources; adequacy of trainers and assessors; valid assessment; and engagement with industry).

In addition, the review looked at how workplace training and assessment (if any) was organised. Provision of workplace training was a concern for those who made submissions to the Productivity Commission and was raised by stakeholders during consultations and interviews.

Details of the standards are explained in this chapter and an excerpt from the Standards is included in Appendix D.

5.2 Overall levels of compliance and non-compliance with the standards

ASQA conducted two types of audit for this strategic review.

1. ASQA conducted 47 registration audits RTOs with early childhood education and care training on their scope as part of its normal regulatory work.
2. ASQA conducted 30 audits specifically for this review. RTOs were randomly selected from each state and territory, in proportion to the number of RTOs delivering the targeted qualifications in that state/territory.

Where possible, the findings of all 77 audits are reported together. However, during the 30 audits undertaken specifically for this review, additional information was sought, and accordingly, where it is useful those 30 audits are reported separately.

Of the 77 RTOs audited, 57 (74.0%) were not able to demonstrate full compliance at the initial audit. (As a comparison, for the period 1 July 2012 to 31 December 2013, of all the RTOs ASQA audited 78.9%, were found not to be compliant at the initial audit.) If RTOs are found not to be fully compliant with the national standards they are given a 20-working-day rectification period to address the non-compliances that were identified at their audit.

Following the 20-working-day rectification period 53 (68.8%) of the RTOs audited for the review were found to be compliant with the RTO standards. (As a comparison, for the period 1 July 2012 to 31 December 2013, of all the RTOs ASQA audited, 75.5% were found to be compliant after the rectification period.) That is, following rectification, there is a lower level of compliance among the RTOs audited on their early childhood education and care delivery. The likely reason for the lower level of compliance is that during the period of the 30 strategic review specific audits, RTOs were transitioning to a new early childhood education and care training package. One of the recommendations discussed in Chapter 6 is to test this supposition through some targeted audits later in 2015.

RTOs found not to be compliant after the rectification period are the subject of further regulatory action by ASQA. Of the 24 RTOs remaining not compliant after rectification, 16 were able to provide sufficient evidence to finally demonstrate compliance following ASQA issuing them with a notice of intention to cancel/suspend all or part of their registration. Thus once regulatory action was completed 69 (89.6%) of the 77 RTOs were able to demonstrate compliance with the standards.

The number of RTOs delivering the early childhood education and care qualifications being examined in this review, the number of registration audits, and the number of audits conducted specifically for this review are shown in Table 18, together with a breakdown of RTOs in each state and territory. The total

number of RTOs audited for this review represents 28.9% of ASQA-regulated RTOs approved to deliver these qualifications.

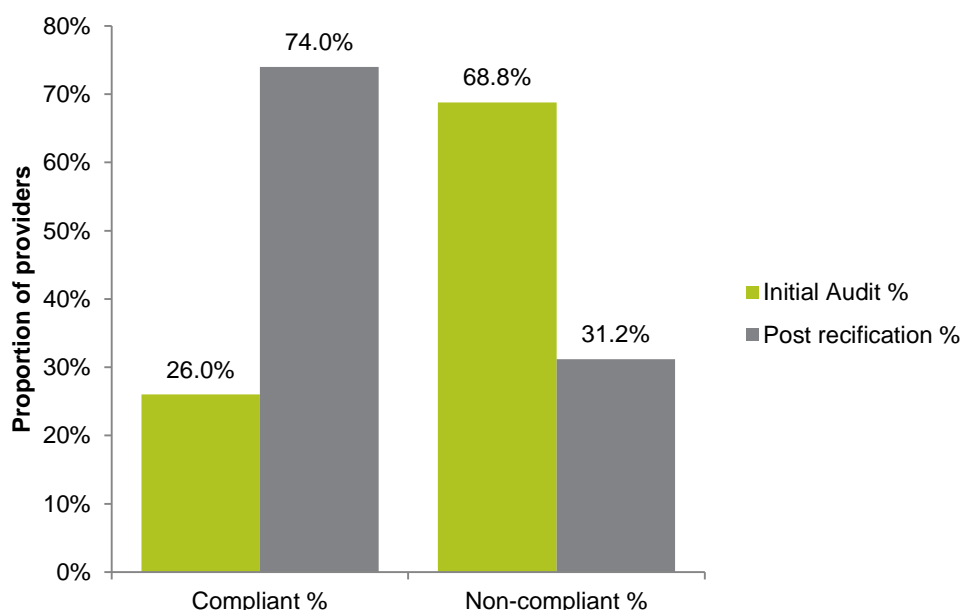
Table 18: Proportion of RTOs audited, by state, January 2013 – May 2014

Jurisdiction	Total number of RTOs approved to deliver these qualifications	Re-registration audits 1 Jan 2013 to 30 April 2014	Audits conducted specifically for this review	Total number of audits	Proportion - all RTOs in jurisdiction (%)
Australian Capital Territory	6	0	1	1	16.7
New South Wales	94	18	9	27	28.7
Northern Territory	4	2	1	3	75.0
Queensland	62	14	8	22	35.5
South Australia	18	2	2	4	22.2
Tasmania	6	0	1	1	16.7
Victoria	65	11	7	18	27.7
Western Australia	8	0	1	1	12.5
Total	263	47	30	77	28.9

Source: ASQA July 2014

The overall level of compliance with the relevant national standards—both at the initial audit and after the rectification period—for the 77 audited RTOs is shown in Figure 15.

Figure 15: Summary of compliance outcomes—at initial audit and following rectification period—for 77 audits conducted during this review



Source: ASQA audits

Results from initial audits

Of the 77 RTOs audited as part of this review, 57 (74.0%) were not able to demonstrate compliance with the Standards at the initial audit (compared with 78.9% of all the RTOs ASQA audited in the six months to 31 December 2013).

While the levels of non-compliance with required national standards found at the initial site audit were high, this non-compliance ranged from very minor issues to very serious non-compliance that could jeopardise the RTO's ongoing registration. Where non-compliance was identified, ASQA provided the RTO with an audit report explaining the non-compliance. RTOs are given 20 working days from the date the report is issued in which to address and rectify the non-compliances identified. Final levels of compliance are then determined once auditors have examined any evidence an RTO submits to rectify the non-compliance identified at the initial audit. The true level of compliance can only be determined after this rectification period.

Post-rectification results

When the RTOs that did not demonstrate compliance at the audit stage were given the opportunity to rectify the non-compliances identified, 34 were able to demonstrate compliance. This brings the total number of audited RTOs able to demonstrate compliance to 53 or 68.8%. (As a comparison, for the period 1 July 2013 to 31 December 2013, of all the RTOs across all training areas that ASQA audited, 75.5% were found to be compliant after the rectification period.)

Final outcome

Of the 77 RTOs audited for this review, about one quarter (26.0%) of RTOs were able to demonstrate full compliance with the standards at the initial audit. Approximately three-quarters (74.0%) of RTOs were not able to demonstrate compliance with the standards, with the causes of non-compliance ranging from minor to major matters. Following the 20 day rectification period, the level of non-compliance fell to just over 30%.

One of the major outstanding issues following rectification was that in many cases the outstanding non-compliances related to one or two of the newly added to scope CHC Community Services Training Package qualifications (*CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care*).

These RTOs failed to demonstrate that they were compliant against one or more of the national standards for reasons including:

- inaccurate training and assessment strategies
- trainers and assessment that did not meet the requirements of the training package
- inadequate training materials and assessment tools
- lack of access to facilities and equipment to meet specific requirements of units of competency, and
- course information inaccurate in terms of mandatory work placement requirements.

Following the 77 audits, 24 RTOs (31%) did not achieve compliance after the rectification period and their audits were finalised as 'not compliant'. Those RTOs found non-compliant post rectification were provided with an audit report that detailed the remaining non-compliance and a notice that outlined the regulatory options available post rectification.⁶ (For example, where a change to scope application was rejected, the RTO was advised they could appeal the decision by lodging an application with the Administrative Appeals Tribunal or submit a new addition to scope application to ASQA.)

Listed below are the outcomes of the regulatory processes taken by ASQA, as at the time this report was prepared for publication:

- Two RTOs had their applications to add new early childhood education and care qualifications to scope rejected and are not currently delivering any early childhood education and care qualifications.
- One RTO had its renewal application rejected and is no longer registered on the national training register to deliver vocational education and training.
- One RTO did not achieve compliance after its post-initial registration audit and is no longer registered on the national training register .
- One RTO went into liquidation and is no longer registered on the national training register.
- One RTO transferred its registration to another regulator and the other regulator has been advised by ASQA of its audit findings.
- One RTO requested withdrawal of early childhood education and care qualifications from its scope of registration.
- One RTO has appealed to the Administrative Appeals Tribunal against ASQA's decision to cancel its scope of registration and the matter is not yet finalised.
- 16 RTOs—after ASQA notified the RTOs of its intention to suspend the relevant part of their scope of registration—have been able to provide sufficient evidence to demonstrate compliance.

In total, 69 (89.6%) of the 77 RTOs were able to demonstrate compliance after all regulatory action was completed.

⁶ The *National Vocational Education and Training Regulator Act 2011* gives RTOs that are dissatisfied with a decision made by ASQA a number of options:

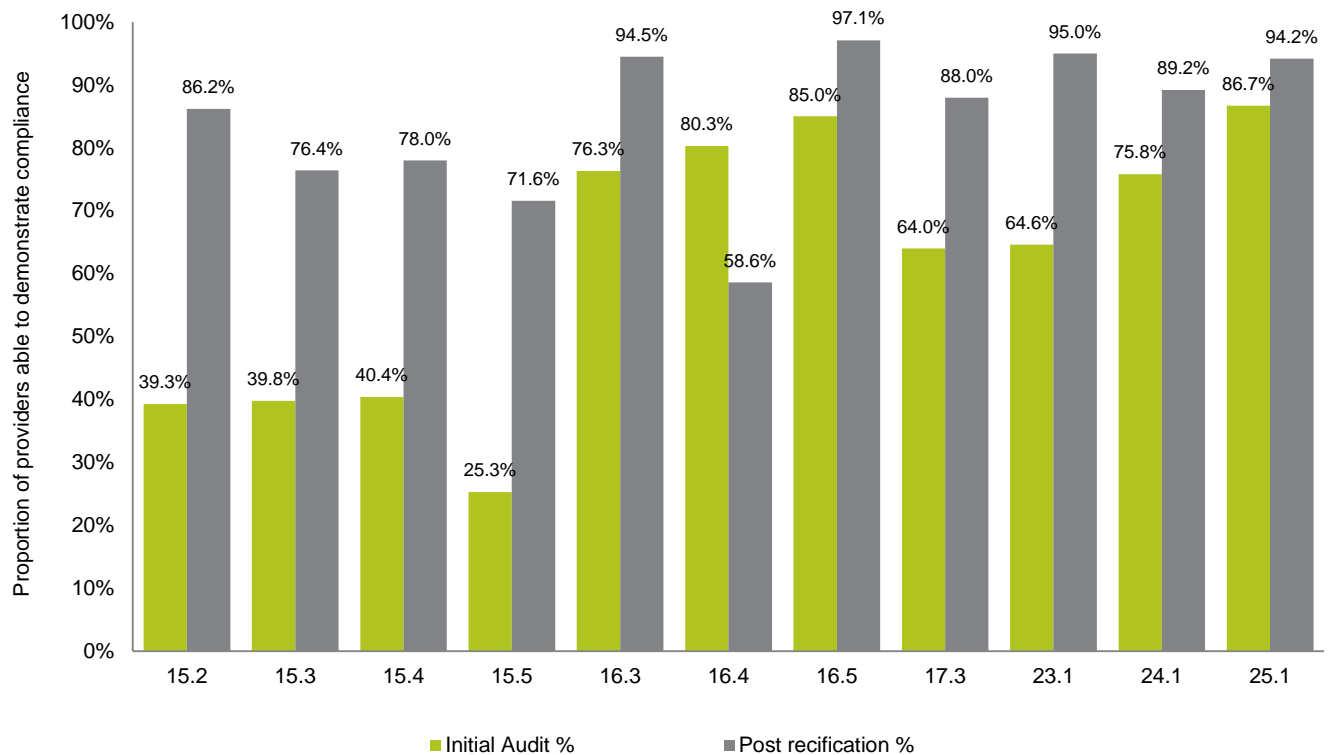
1. Consider the reasons for the decision, address the outstanding areas of non-compliance and submit a fresh application.
2. Ask ASQA to reassess its position.
3. Ask ASQA to reconsider the decision.
4. Apply to have the decision reviewed by the Administrative Appeals Tribunal (AAT).

Further information about the reconsideration process can be found at Appendix F.

Compliance against specific standards

Figure 16 shows the proportion of RTOs that were able to demonstrate compliance with relevant standards at the initial audit and after the rectification period.

Figure 16: Compliance demonstrated against relevant standards, at the initial audit and after a 20-day rectification period, by RTOs (77) audited as part of this review



Source: ASQA audits

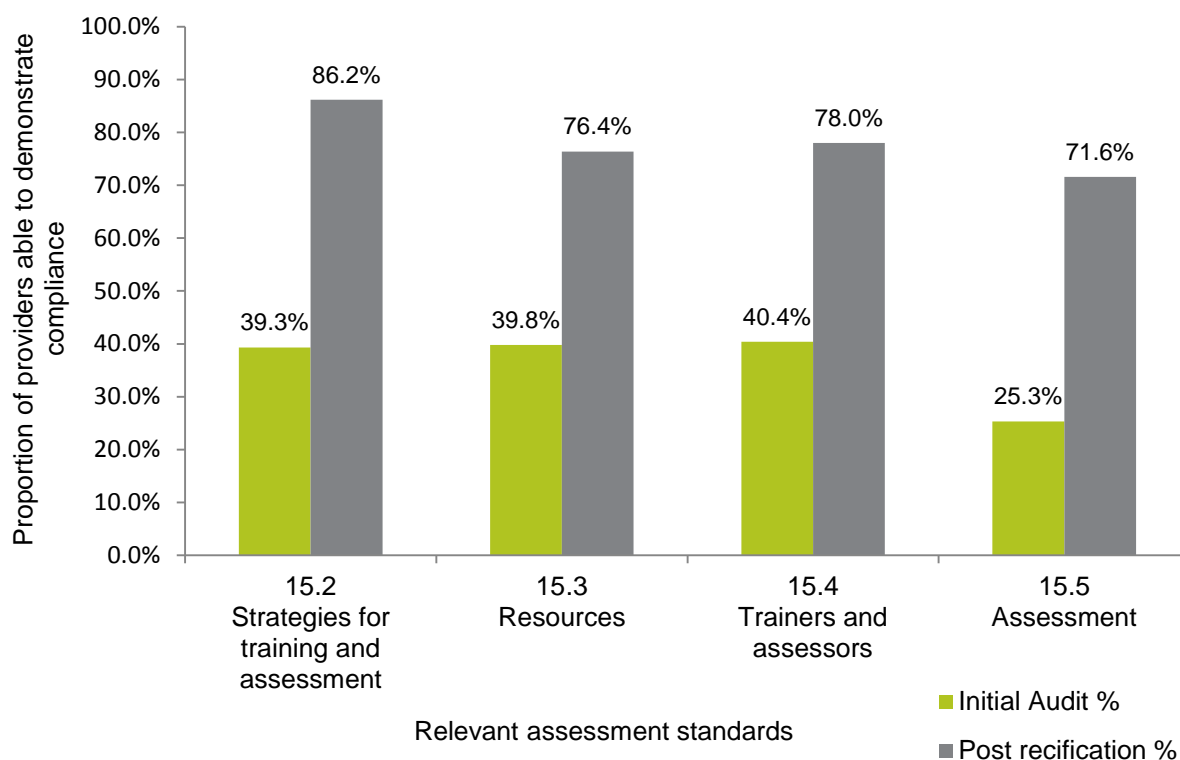
15.2 Strategies for training and assessment; 15.3 Resources; 15.4 Trainers and assessors; 15.5 Assessment; 16.3 Information provided to learners before enrolment; 16.4 Employer involvement; 16.5 Support services; 17.3 Partnerships; 23.1 Issuance; 24.1 Marketing; 25.1 Managing transition

Not all standards were reviewed at audit, as was the case for SNR 17.3 (Standard 2.4 of the 2015 Standards). Under this standard, RTOs are required to monitor all training and/or assessment services provided on their behalf to ensure that it complies with all aspects of the VET Quality Framework. Not all RTOs have such arrangements.

The greatest rate of non-compliance in the qualifications sampled was recorded against the training and assessment standard, Standard 15 (Standards 1.1, 1.3, 1.4, 1.5, 1.6, 1.8, 1.13, 1.14, 1.15, 1.16 and 2.2 of the 2015 Standards), specifically the assessment requirements standard, Standard 15.5 (Standard 1.8 of the 2015 Standards).

The proportion of RTOs that were able to demonstrate compliance with Standard 15 (Standards 1.1, 1.3, 1.4, 1.5, 1.6, 1.8, 1.13, 1.14, 1.15, 1.16 and 2.2 of the 2015 Standards) at audit and after the rectification period is shown in Figure 17, with each of the key elements of training and assessment strategies, resources, trainer and assessor qualifications and assessment requirements listed.

Figure 17: Compliance demonstrated against Standard 15* for by RTOs (77) audited as part of this review



Source: ASQA audits

*Standard 15 (Standard 15.2 {Standards 1.1, 1.4, 1.5 and 1.6 of the 2015 Standards}, Standard 15.3 {Standards 1.3, 1.5 and 1.6 of the 2015 Standards}, Standard 15.4 {Standards 1.13, 1.14, 1.15 and 1.16 of the 2015 Standards}, Standard 15.5 {Standard 1.8 of the 2015 Standards})

5.3 Training and assessment strategies—Standard 15.2

Requirements of the Standard

Standard 15.2 (Standards 1.1, 1.4, 1.5 and 1.6 of the 2015 Standards—see Appendix D) requires RTOs to have strategies for training and assessment which meet the requirements of the training package. These strategies are to guide trainers and assessors who are delivering a course (a cluster of units or a qualification) to students. The training and assessment strategies must be developed *through effective consultation with industry*.

There is no specific format for describing a strategy. However, it should include key parameters such as:

- whether the course is delivered in a classroom, a work-based setting or a blend of both
- assessment methods
- additional components, such as workplace training
- what (if any) prerequisites are required
- who the targeted learners are (for example school leavers, existing workers), and
- an outline of the units included.⁷

⁷ Further clarification of what could be in a training and assessment strategy is contained in the *AQTF Users' Guide to the Essential Conditions and Standards for Continuing Registration 2011*.

Where a qualification requires assessment in a workplace, the RTO should ensure the timing and quantity of work placement is clearly stated in the training and assessment strategy, given that this is a key parameter in supporting outcomes for students.

An RTO can change its training and assessment strategy at any time, and there is no requirement that the changes be reviewed by a regulator. Such changes might be made to reflect the needs of a new client group, or the availability of different resources. This flexibility is necessary and desirable. However, the requirement that the strategies are developed with effective consultation with industry should mean that the strategies (both as developed initially and as amended) would meet the needs of learners (and others affected, such as employers and children) and the requirements of the training package.⁸

In previous ASQA strategic reviews, which looked at training in aged care and in the construction industry, participants raised concerns about shortened duration of learning (or what is termed 'volume of learning' [ASQA 2014a and ASQA 2014b]). Issues raised included the effect shortened course duration may have on the quality of outcomes, and on the depth and rigour of training and assessment. The AQF (2013) benchmarks a certificate III and a diploma with a volume of learning of typically one to two years, with 1200 hours being the equivalent of a full-time year.

Requirements of the training package

Each qualification within the Community Services Training Package requires a mix of core and elective units. Each of these units of competency includes specific knowledge and skills. Before they can be found competent by the RTO, a learner must demonstrate the specific knowledge and skills:

- within the industry context ,and
- across the range of conditions, as described in the unit.

Between the different versions of the Community Services Training Package the assessment advice varies, with the CHC Community Services Training Package having greater specificity in the requirements, as shown in Table 19.

⁸ Training Packages are developed by industry, through extensive industry consultation and are 'owned' by Industry Skills Councils.

Table 19: Assessment requirements

CHC08 Community Services Training Package*	CHC Community Services Training Package† (Qualifications introduced in 2013)
<ul style="list-style-type: none"> Some units, for example <i>CHCPR301B Provide experiences to support children’s play and learning</i>, ‘must be assessed on the job under the normal workplace conditions for a range of age groups, a range of conditions over a number of assessment situations’. 	<ul style="list-style-type: none"> Some units, for example <i>CHCECE007 Develop positive and respectful relationships with children</i>, require that performance evidence must be completed ‘at least once’. Units of competency are required to be demonstrated in a ‘regulated education and care service’. Some units of competency in <i>CHC30113 Certificate III in Early Childhood Education</i> indicate that the performed activities are to be demonstrated ‘during a period of at least 120 hours of work⁹ in at least one regulated education and care service’. For <i>CHC50113 Diploma of Early Childhood Education and Care</i> it is for a period of 240 hours.

Note:

* *CHC30708 Certificate III in Children’s Services* (superseded), *CHC30712 Certificate III in Children’s Services* (superseded), *CHC50908 Diploma of Children’s Services* (Early Childhood Education and Care (superseded)

† *CHC30113 Certificate III in Early Childhood Education and Care*, *CHC50113 Diploma of Early Childhood Education and Care*

The training and assessment strategies developed by RTOs need to reflect these assessment requirements, especially:

- demonstration of competence in a regulated education and care service, and
- minimum hours of work placement for each qualification.

The 30 RTOs specifically audited for this review utilised a range of training and assessment strategies to explain the various modes of delivery. Some RTOs presented two or more training and assessment strategies, due either to different delivery modes or different target groups. For some of these 30 RTOs, the predominant mode of delivery was face-to-face with a work placement; however, distance delivery was the next major delivery method proposed. Distance delivery was generally either through text-based delivery or online, and was often described by RTOs as ‘flexible delivery’. A summary of the delivery modes utilised by the 30 RTOs specifically audited for the review is shown in Table 20.

⁹ *CHC30113 Certificate III in Early Childhood Education*

Table 20: Delivery modes used by the 30 RTOs specifically audited for this review

Delivery mode	Number of RTOs using
Traineeships	10
Distance (hard copy or online) learning, plus work placement or work-based ¹⁰	14
Face-to-face, plus work placement	26
Work-based	6
Face-to-face only	2

Source: ASQA audits 2014

A key focus of this review was to evaluate the duration of courses provided by RTOs. All RTOs specifically audited for the review were required to provide information on course durations for each early child education and care qualification, including:

- total number of weeks of each course including work placement
- total hours of course duration including work placement, and
- total hours of work placement.

Analysis of data collected on these 30 RTOs indicates course duration is considerably less than that set out in the requirements of the AQF.

For certificate III qualifications, course duration ranged from 14 weeks to 104 weeks, with the greatest variance in the delivery of *CHC30113 Certificate III in Early Childhood Education and Care*. The majority of RTOs were delivering certificate III courses over periods of between 27 and 52 weeks. In general, RTOs that had been delivering the *CHC30708 Certificate III in Children's Services* and the *CHC30712 Certificate III in Children's Services* increased the number of weeks of delivery following the introduction of the *CHC30113 Certificate III in Early Childhood Education and Care*.

For diploma qualifications, course duration ranged from 18 weeks to 156 weeks, with the greatest variance in the delivery of *CHC50113 Diploma of Early Education and Care*. The majority of diploma courses were delivered over periods of 80 to 104 weeks. Again, RTOs that had been delivering *CHC50908 Diploma of Children's Services (Early Education and Care)* increased the number of weeks of delivery following the introduction of the *CHC50113 Diploma of Early Education and Care*.

Under the requirements of the AQF, the duration of a certificate III and a diploma is from one to two years, anticipating full-time delivery and a range of activities. This equates to between 1200 hours and 2400 hours, based on the advice that 1200 hours is equivalent to one year of full-time study. Notwithstanding that the information provided by RTOs addressed only classroom delivery and work placement, a significant proportion of the courses fell short of the recommended minimum duration.

There was variation in the way RTOs designed courses in terms of classroom delivery (or other approaches, such as online) and the blend of work placements or employment. The courses that included a traineeship were often longer in duration than those courses based on traditional classroom delivery accompanied by a work placement. Some RTOs did not estimate the number of hours in the workplace if it was a traineeship, or if students were employed in the sector, or if the course was delivered online. There were two RTOs that indicated that they provided only classroom delivery for *CHC30708 Certificate III in Children's Services* and/or for *CHC50908 Diploma of Children's Services*

¹⁰ Sometimes referred to by RTOs as 'flexible'.

(*Early Education and Care*). There were four RTOs that nominated self-paced delivery accompanied either with a work placement or employment.

The analysis of hours within a course provides a different picture from that of the number of weeks allocated. In general, the hours for certificate III courses for *CHC30113 Certificate III in Early Childhood Education and Care* and superseded courses are similar. However, in the diploma courses, the *CHC50908 Diploma of Children's Services (Early Education and Care)* had fewer hours than the *CHC50113 Diploma of Early Education and Care*. The variance of the range is similar in the three certificate III qualifications, although for the diploma courses the variance in hours is greater in the *CHC50113 Diploma of Early Education and Care*.

Although there are no specific or mandatory work placement requirements in the *CHC08 Community Services* qualifications, some units of competency require workplace observation. In addition, some units implicitly cannot be assessed without being demonstrated in the workplace. There is a mandatory work placement component in *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Education and Care*; however, six RTOs in the random sample had not complied with this requirement.

Analysis of work placement hours—which are achieved through placement, traineeship or employment—indicates that this is the factor most affecting course duration.

The ranges of work placement hours indicated by RTOs were:

- *CHC30708 Certificate III in Children's Services* and *CHC30712 Certificate III in Children's Services* between 0 hours and 1196 hours
- *CHC30113 Certificate III in Early Childhood Education and Care* between 110 hours and 1976 hours
- *CHC50908 Diploma of Children's Services (Early Education and Care)* between 0 hours and 3952 hours, and
- *CHC50113 Diploma of Early Education and Care* between 20 hours and 1196 hours.

Those RTOs that estimated work placement hours below that of the mandatory hours for the most current qualifications¹¹ did not comply with the requirements listed in units of competency and in the *Implementation Guide for CHC Community Services Training Package* (October release 2013).

Areas of non-compliance

Just over a third (39.3%) of the 77 RTOs audited were able to demonstrate that their training and assessment strategies were compliant with the Standards. Following the rectification period, the level of compliance rose to 86.2%.

For the 30 RTOs specifically audited for this review, the main reasons for the level of non-compliance at audit related to inaccurate or insufficient information. Their training and assessment strategies did not provide an accurate or sufficiently detailed framework for delivery and assessment and had not been adapted to meet the needs of the various target groups. Specific issues are shown in Table 21.

These findings substantiate the notion that the percentage of RTOs offering early childhood education and care training that are able to demonstrate that their training and assessment strategies are compliant, is similar to the percentage of all RTOs able to demonstrate this.

¹¹ *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Education and Care*

Table 21: Summary of issues related to training and assessment among the 30 RTOs specifically audited for this review

Issue	Specifics
Accuracy and sufficiency of information	<ul style="list-style-type: none"> • inaccurate qualification titles and codes • inaccurate units of competency titles and codes • inaccurate trainer and assessor details • inaccurate information pertaining to delivery and assessment, including unclear or unspecified mode, duration/hours • inaccurate assessment methods described in strategy that do not reflect methods used • inaccurate packaging for completion of qualification, including not enough units of competency, incorrect packaging and too many units of competency without justification or additional information to ensure that the qualification would be issued when completed • does not accurately describe the resources required • clustering of unit of competencies was inaccurate • validation information inaccurate • insufficient detail regarding when assessment will occur • various documents describing the strategy are not obviously linked and hold inconsistent information • superseded units of competency still included in strategy, for example in <i>CHC30712 Certificate III in Children’s Services</i> the revised unit <i>HLTFA311A Apply first aid</i> was not included
Work placement	<ul style="list-style-type: none"> • information related to workplace assessment was inaccurate as there was no workplace assessment • no work placement when the units of competency require observation in the workplace • no information or insufficient information about work placement, including number of hours, when it will occur and how it will be organised to ensure that assessment methods can be met • insufficient hours for mandatory work placement for <i>CHC30113 Certificate III in Early Childhood Education and Care</i> and <i>CHC50113 Diploma of Early Childhood Education and Care</i> • indicated that there was no work placement and did not provide sufficient advice as to how ensure a simulated environment • lack of explanation as to role of the key participants in the learning and assessment undertaken in the workplace
Approach	<ul style="list-style-type: none"> • strategies not adapted to meet the different needs of target groups • no evidence of trainers’ involvement in the learning process other than providing students with work booklets and marking assessment activities submitted by students
Effective industry consultation	<ul style="list-style-type: none"> • lack of evidence of consultation with industry or of informing the strategy

Source: ASQA audits

The large proportion of RTOs that are unable to document an accurate training and assessment strategy indicates that many do not fully appreciate the importance of these plans. Evidence collected during this review suggests that RTOs do not fully read or interpret the training package requirements, specifically units of competency requirements, and then develop a strategy to ensure that the requirements will be met. In addition, RTOs did not demonstrate that they can apply the advice in the AQF in terms of volume of learning and ensure that the volume of learning in their RTO's course design is consistent with the needs of specific target groups.

Finally, the *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care* have been newly added to existing RTOs' scope of delivery through a process of automatically updating the register. Of the 30 randomly sampled RTOs found to be non-compliant with this standard, 14 RTOs were found to be non-compliant wholly or partly with this Standard, as they could not demonstrate that their strategies met the requirements of *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care*.

Examples of good practice

The following examples of good practice were noted at the randomly sampled audits:

- One RTO worked for a long time with a partnering services organisation to design a training and assessment strategy that was effective for the particular target group.
- Another RTO demonstrated effective industry consultation and engagement in the development of individual courses.
- Another RTO demonstrated ongoing improvements were being made to the training and assessment strategies, including adjusting the conduct of the workplace assessment.

5.4 Resources required—Standard 15.3

Requirements of the Standard

Standard 15.3 (Standards 1.3, 1.5 and 1.6 of the 2015 Standards) requires RTOs to have the resources (staff, facilities, equipment, training and assessment materials) required by the training package and the training and assessment strategies to deliver the courses. It intersects with some other standards, for example, if the trainers do not have appropriate qualifications (Standard 15.4 [Standards 1.13, 1.14, 1.15 and 1.16 of the 2015 Standards]) or assessment is non-compliant with requirements (Standard 15.5 [Standard 1.8 of the 2015 Standards]), then the RTO is generally also not compliant with Standard 15.3 (Standards 1.3, 1.5 and 1.6 of the 2015 Standards).

Requirements of the training package

Between the different versions of the Community Services Training Package the assessment advice varies; however, access to a workplace underpins both versions of the Community Services Training Package.

Some units of competency within the *CHC30708 Certificate III in Children's Services*, *CHC30712 Certificate III in Children's Services* and the *CHC50908 Diploma of Children's Services (Early Childhood Education and Care)*—for example, *CHCPR301B Provide experiences to support children's play and learning*—'must be assessed on the job under the normal workplace conditions for a range of age groups, a range of conditions over a number of assessment situations'.

For some units in *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care*—for example, in *CHCECE007 Develop positive and respectful relationships with children*—performance evidence must be completed ‘at least once’, and the ‘skills must be demonstrated in a regulated education and care service’.

For *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care*, the units of competency indicate that the performed activities are to be demonstrated ‘during a period of at least 120 hours of work in at least one regulated education and care service’ or 240 hours with the diploma.

Therefore, training and assessment materials and strategies need to ensure that the scope of the knowledge and skills development required by the units of competency is met.

Areas of non-compliance

At audit, just over a third of RTOs (39.8%) were able to show that they had sufficient resources to deliver and assess the early childhood education and care courses properly. Following the rectification period this level of compliance rose to 76.4%.

Reasons for non-compliance at the initial audit included:

- trainers and assessors not meeting requirements of Standard 15.4 (Standards 1.13, 1.14, 1.15, and 1.16 of the 2015 Standards)—for example, trainers did not have vocational competence (see Appendix D)
- assessment not meeting the requirements of Standard 15.5 (Standard 1.8 of the 2015 Standards) —for example, assessment did not meet the principals and rules of evidence (Appendix E)
- training materials were inadequate or incomplete,
- learners had inadequate access to facilities and equipment, including for simulation, or
- inaccurate training and assessment strategies.

The predominant reasons for non-compliance were that staff did not meet Standard 15.4 (Standards 1.13, 1.14, 1.15 and 1.16 of the 2015 Standards) and/or assessment did not meet Standard 15.5 (Standard 1.8 of the 2015 Standards) or had not been fully developed for the new qualifications (*CHC50113 Diploma of Early Childhood Education and Care*, and/or *CHC30113 Certificate III in Early Childhood Education and Care*) even though these qualifications had been added to their scope of registration. Non-compliances related to inadequate training materials were again predominantly for the same reason—resources had not been fully developed for the *CHC50113 Diploma of Early Childhood Education and Care*, and/or *CHC30113 Certificate III in Early Childhood Education and Care* even though these qualifications had been added to their scope of registration.

In the case of one RTO, ASQA found the ratio of one staff member to 126 students inadequate to ensure the quality of training and assessment outcomes—especially as students were undertaking part of their training in the workplace and required assessment and support by the trainer/assessor. In another instance, a training organisation was relying on a third party to supply equipment for a simulated workplace in the classroom, yet there was no agreement and no evidence of the facilities and equipment. In at least two instances, lack of facilities and equipment plus lack of access to children meant that the RTO could not simulate scenarios to meet the requirements of *CHC30708 Certificate III in Children’s Services* and *CHC30712 Certificate III in Children’s Services*.

As mentioned previously, CHC30113 *Certificate III in Early Childhood Education and Care* and CHC50113 *Diploma of Early Childhood Education and Care* have been newly added to RTOs' scope of delivery through a process of automatically updating the register. Four RTOs were found to be non-compliant as they could not demonstrate that they had access to training materials for all of the new units of competency at the time of the initial audit.

Examples of good practice

The following examples of good practice were noted at the randomly sampled audits:

- One RTO purchased resources and implemented a continuous improvement process to adapt and adjust resources to better suit the student cohort.
- Another RTO had excellent resources in place for simulation, including programmable electronic babies.
- Another RTO had substantial resources including a large library, online references and an online booking system.

5.5 The adequacy of trainers—Standard 15.4

Requirements of the Standard

Standard 15.4 (Standards 1.13, 1.14, 1.15 and 1.16 of the 2015 Standards) requires that trainers and assessors:

- have training and assessment competencies—currently defined as holding the *TAE40110 Certificate IV in Training and Assessment* or demonstrated equivalent competencies
- have relevant vocational competencies
- have current industry skills, and
- continue to develop their knowledge and skills related to VET, their training and assessing competence, and their industry currency.

Vocational competency is defined as 'broad industry knowledge and experience, usually combined with a relevant industry qualification'. A person who has vocational competency will be familiar with the content of the vocation and will have relevant current experience in the industry. Vocational competency must be considered on an industry-by-industry basis and with reference to any guidance provided in the relevant training package or accredited course (National Skills Standards Council 2013).

The notion of vocational competency, therefore, is linked to both *current industry skills* and *industry currency* which are independently included within the Standard. The findings of the audits for this review indicated that the majority of RTOs employ trainers and assessors who:

- do not hold 'relevant vocational qualifications', and
- do not have current industry experience.

Coupled with the notion of vocational competency is the requirement that trainers/assessors should also continue to develop their VET knowledge, and their training and assessment competence. Audit findings for the 30 RTOs specifically audited for this review indicate that most RTOs do not meet this requirement.

Requirements of the training package

The relevant training packages do not require additional requirements beyond that of the Standards and the then National Skills Standards Council's determination. However, given the high level of non-compliance with the assessment standard (Standard 15 [Standards 1.1, 1.3, 1.4, 1.5, 1.6, 1.8, 1.13, 1.14, 1.15, 1.16 and 2.2 of the 2015 Standards]), it is worth noting that the *TAE40110 Certificate IV in Training and Assessment* does not include *TAEASS502B Design and develop assessment tools* as a core unit. Nor do the Standards require somebody within the organisation to hold this specialist unit and be able to advise assessors in the RTO.

Areas of non-compliance

At the initial audit, 40.4% of all audits showed that RTOs were compliant with the standard and had trainers and assessors who met the qualifications, vocational skills, experience and currency requirements. Following the rectification period, the level of compliance rose to 78%.

The high level of non-compliance at the initial audit is consistent with the findings of the 2013 strategic review of aged care. The highest level of non-compliance related to trainers/assessors lacking current industry skills; and an inability to demonstrate that trainers/assessors have continued to develop their knowledge and skills related to VET, training and assessing competence and their industry currency.

Table 22 outlines the audit findings relevant to trainer and assessor qualifications and experience.

Table 22: Proportion of the RTOs specifically audited for this review that were not compliant against each aspect of Standard 15.4*at initial audit

Staff	Proportion not compliant (%)
Trainers and assessors hold training and assessing qualifications	20.0
Trainers and assessors hold relevant vocational qualifications	57.0
Trainers and assessors have current industry experience (within the past 5 years)	73.0
Trainers and assessors continue to develop their skills and knowledge	63.0

Source: ASQA 2014

* Standards 1.13, 1.14, 1.15 and 1.16 of the 2015 Standards

These audit findings indicate that:

- RTOs need to be proactive in ensuring the currency of trainers/assessors
- RTOs need to have a system in place to determine and verify vocational equivalence, and
- RTOs need to ensure that trainers/assessors continue to develop their knowledge and skills about VET and training and assessing competence.

CHC30113 Certificate III in Early Childhood Education and Care and *CHC50113 Diploma of Early Childhood Education and Care* have been newly added to RTOs' scope of delivery through a process of automatically updating the register. Eight RTOs could not demonstrate that they had training and assessing staff that demonstrated vocational competence and current industry experience.

Example of good practice

At the 30 audits conducted specifically for this review, the following examples of good practice were noted:

- One enterprise RTO employed trainers and assessors who were working within the sector to ensure vocational currency.
- Another RTO ensured that its trainers and assessors could demonstrate training and assessment currency and vocational skills currency by managing professional development, utilising a log and a professional development plan undertaken on a yearly basis.

5.6 Assessment—Standard 15.5

Requirements of the Standard

Standard 15.5 (Standard 1.8 of the 2015 Standards) requires that assessment (including recognition of prior learning) must:

- meet the requirements of the training package
- be in accordance with the principles of assessment—that is, be valid, reliable, flexible and fair¹²
- be conducted according to the rules of evidence—that is, for sufficient, valid, authentic and current evidence to be collected
- meet workplace requirements, and
- be systematically validated.

The *Standards for RTOs 2015* also require RTOs to:

- demonstrate that assessment is conducted in accordance with the principles of assessment and with the rules of evidence, and
- develop assessment tools and use, them in line with the instructions within the tools. An assessment tool includes the following components:

‘... context and conditions of assessment, tasks to be administered to the student, an outline of the evidence to be gathered from the candidate and evidence criteria used to judge the quality of performance (that is the assessment decision-making rules). This term also takes in the administration, recording and reporting requirements, and may address a cluster of competencies as applicable for holistic assessment.’ (ASQA 2014a)

Validation involves checking that the assessment tool has produced valid, reliable, sufficient, current and authentic evidence to enable reasonable judgements to be made as to whether the requirements of the relevant aspects of the training package have been met. It includes reviewing and making recommendations for future improvements to the assessment tool, process and/or outcomes (National Quality Council 2009).

¹² Refer to Appendix D for definitions of these terms.

Requirements of the training package

Between the different versions of the Community Services Training Package, the detail and clarity of assessment requirements vary.

Some units of competency within the superseded qualifications¹³ require assessment in the workplace. For example, *CHCPR301B Provide experiences to support children's play and learning* requires that this unit 'must be assessed on the job under the normal workplace conditions for a range of age groups, a range of conditions over a number of assessment situations'.

Some units of competency in *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care*—for example, *CHCECE007 Develop positive and respectful relationships with children*—require performance evidence to be completed 'at least once', and that the 'skills must be demonstrated in a regulated education and care service'. The *Implementation Guide for CHC Community Services Training Package* (October release 2013) defines a regulated education and care service 'as any service providing education and care to children less than 13 years of age that is licensed or approved under state or territory legislation. This would include long day care, family day care, preschools/kindergartens and outside school hours care (which are typically regulated under national regulations), as well as occasional care and mobile services (which are typically regulated under state or territory specific legislation)' (p. 46).

Some units of competency in *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care* require a range of contexts—for example, *CHCECE026 Work in partnership with families to provide appropriate education and care for children* requires candidates to demonstrate working 'collaboratively with at least three different families'. The *Implementation guide for CHC Community Services Training Package* (October release 2013) refers to these requirements (for varying ages of children, range of families etc.) as 'frequency and volume' requirements.

The Community Services and Health Industry Skills Council advises that assessment of performance in the workplace should be undertaken by an RTO's assessors and/or enterprise-qualified assessors. Any reviews of performance undertaken by unqualified workplace staff for the purposes of providing evidence to the RTO's assessor are considered 'third-party reports', and do not equate to observation by an assessor.

For *CHC30113 Certificate III in Early Childhood Education and Care*, some units of competency indicate that the performed activities are to be demonstrated 'during a period of at least 120 hours of work in at least one regulated education and care service'.

For *CHC50113 Diploma of Early Childhood Education and Care*, some units of competency indicate that 240 hours of work applies.

The *Implementation guide for CHC Community Services Training Package* (October release 2013) indicates that ideally assessment should be integrated, and that if workplace assessment of a unit of competency is not practical, a simulated environment may be used to supplement assessment in the workplace. The guide specifies that the simulated environment:

- must replicate real-life working conditions with all the required equipment and conditions of a working environment, including interactions with clients and co-workers, and
- should include conditions where learners perform the skills:

¹³ *CHC50908 Diploma of Children's Services (Early Childhood Education and Care)* (superseded), *CHC30708 Certificate III in Children's Services* (superseded) and *CHC30712 Certificate III in Children's Services* (superseded)

- as a component of multiple tasks
- within a team, and
- with interruptions, with difficult clients and in unexpected situations.

Areas of non-compliance

At the initial audit, just a quarter (25.3%) of all audits (registration audits and randomly sampled audits) showed that RTOs were compliant with all aspects of the assessment standard (SNR 15.5 [Standard 1.8 of the 2015 Standards]). Following the opportunity to address the non-compliances identified in their audit reports, the compliance rate rose to 71.6%.

Assessment

At the initial audit the main reasons for non-compliance with the *CHC50908 Diploma of Children's Services (Early Childhood Education and Care)*, *CHC30708 Certificate III in Children's Services* and *CHC30712 Certificate III in Early Childhood Education and Care* included:

- poorly developed assessment tools that:
 - did not ensure that the requirements of the unit of competency would be met
 - provided insufficient advice to assessors on how to determine sufficient evidence and make a decision of competence
 - lacked tasks to be observed by the assessor or the workplace supervisor, and
 - lacked expected performance indicators
- although assessment tools indicated that the assessor was to undertake observations in the workplace, there was no evidence of assessors undertaking these assessments, or assessors were defaulting to workplace supervisors for all or part of these observations
- observations of skills on only one occasion (even though units of competency required assessments to include 'a range of age groups, a range of conditions over a number of assessment situations')
- observation checklists were inadequate and comprised copied elements and/or performance criteria and/or required skills, or observation checklists did not include behaviours that were observable
- assessment implementation indicated that the assessment tools were not fully utilised or completed for individual students
- over-reliance on the workplace supervisor as the main or only observer of workplace performance
- purchased assessment tools that were not contextualised to the student cohort or specific workplace environments
- no advice as to how to simulate a workplace, and
- the only evidence of workplace performance was evidence provided by students (workplace documents which they had prepared and students' self-reflection on how they had demonstrated the competencies in the workplace).

The assessment issues identified with the three qualifications listed above were similar to those identified with the *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care*. In addition, specific reasons for non-compliance related to these two qualifications included:

- students had been deemed competent on generic statements

- RTOs provided no evidence of the regulated environment (education and care service) or a workplace for assessment purposes
- assessments did not meet the 'frequency and volume' requirements
- students were asked to provide evidence, and self-reflect on how they had demonstrated the competencies in the workplace, and this comprised the only evidence from the workplace, and
- group assessment tasks did not have clear guidance as to how to determine individual performance.

In addition, the *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care* had been newly added to the RTOs' scope of delivery through a process of updating the register. Four RTOs were found to be non-compliant with this Standard as they could not demonstrate that they had developed assessment tools for all of the units of competency at the time of the initial audit.

Recognition of prior learning

Recognition of prior learning is an assessment process that assesses an individual's formal, non-formal and informal learning to determine the extent to which that individual has achieved the required learning outcomes, competency outcomes, or standards for entry to, and/or partial or total completion of, a VET qualification.

For almost a third of the RTOs audited specifically for this review, ASQA made adverse findings in relation to recognition of prior learning. Recognition of prior learning is seen as an assessment process that assesses an individual's competence (unconnected to training) for partial or total completion of a qualification. As recognition of prior learning is viewed as an assessment process under Standard 15.5 (Standard 1.8 of the 2015 Standards), RTOs providing recognition services must:

- have in place assessment tools for this process, and
- be able to demonstrate implementation of these tools if recognition has occurred.

The main issues identified were:

- workplace assessment merely listed elements from the unit of competency and did not provide sufficient advice about how competence should be demonstrated
- although in many cases assessment tools were robust evidence collection devices, assessment tools did not provide sufficient advice to assessors about how to synthesise evidence to make a decision of competence, and
- there were no assessment tools developed for the *CHC50113 Diploma of Early Childhood Education and Care*.

The high level of non-compliance with this standard, even following the rectification period, is partly due to the difficulty RTOs had in demonstrating that they had developed assessment tools for the *CHC50113 Diploma of Early Childhood Education and Care*.

Validation

A third of the RTOs audited specifically for this review either:

- had not validated units of competency related to the qualifications under review, or
- had undertaken validation that was ineffective and/or inadequate to ensure that assessment met the Standard.

The fact that a third of the RTOs were not compliant with this aspect of the Standard raises concern about the quality of assessment—given that validation is a critical component of quality assurance and continuous improvement of assessment in the VET sector.

Examples of good practice

The following examples of good practice were noted at the randomly sampled audits:

- Some RTOs assessed all units in the workplace.
- RTOs' assessors worked alongside students in the workplace.
- Recognition of prior learning assessment tools and information were comprehensive. The RPL process included the RTO and the learner coming to an agreement on what evidence is acceptable prior to the student collecting the evidence.

5.7 Information to clients—Standard 16.3

Requirements of the Standard

Standard 16.3 (Standards 5.1 and 5.2 of the 2015 Standards) requires that before clients enrol or enter into an agreement, the RTO informs them about:

- the training, assessment and support services to be provided, and
- client rights and obligations.

This Standard is closely linked to Standard 24.1 (Standard 4.1 of the 2015 Standards).

Requirements of the training package

Specific information about what should be provided to applicants (in addition to what is listed in the Standard) is not included in the training package.

However, depending on the qualification, the training package requires RTOs to communicate key information to potential learners:

- the requirement for a work placement, and
- the requirement to have been cleared—through a Working With Children Check—to be able to undertake the work placement or work in the sector.

Areas of non-compliance

At the 77 audits conducted for this review, 76.3% of the audited RTOs were able to demonstrate that they provided information to potential learners in a way that met the requirements of the Standard. Following the opportunity to address the non-compliances identified in their audit reports, the rate of compliance rose to 94.5%.

The majority of issues identified related to:

- lack of information pertaining to required work placements and to the requirement to be cleared for working with children
- lack of information relating to rights and obligations
- lack of information relating to support services, and
- inaccurate or insufficient information relating to the units of competency to be completed.

The lack of information about the requirement for students to be cleared for working with children is important for any potential student that may not be able to meet this requirement.

Eight of those RTOs audited specifically for this review were found to be not compliant at initial audit. Of these, three were found not-compliant wholly or partly due to providing either no information, or insufficient information, about mandatory work placement requirements.

RTOs had difficulty meeting this Standard in relation to the qualifications that had been newly added to their scope of registration through an automatic update by ASQA—*CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care*.

Examples of good practice

The following examples of good practice were noted at the randomly sampled audits:

- RTOs providing clear information regarding work placement duration and workplace expectations.
- An RTO providing learners with comprehensive information prior to enrolment, through documentation and a mandatory induction session. Trainers at this RTO meet with learners prior to commencement.

5.8 Engagement with industry—Standard 16.4

Requirements of the standard

Standard 16.4 (Standards 1.5 and 1.6 of the 2015 Standards) requires that employers and other parties who contribute to learners' training and assessment are engaged in the development, delivery and monitoring of training and assessment. Put simply, the Standard requires that:

- employers are engaged in the development of training and assessment for students, and
- the RTO and employers understand the contribution employers will make (for example by providing a mentor or supervisor).

Requirements of the training package

The training package requires that *CHC30113 Certificate III in Early Childhood Education and Care* and the *CHC50113 Diploma of Early Childhood Education and Care* include a set number of hours to be completed in the workplace: 120 hours and 240 hours respectively. In addition, some units of competency require assessment to occur in a regulated environment (education and care service).

The Community Services and Health Industry Skills Council's *Implementation guide for CHC Community Services Training Package* indicates that 'evidence of work placement must be collected as part of the performance evidence in the units in which the requirement appears. Evidence may include timesheets, log books, meeting minutes or other forms of workplace documentation' (p. 46).

Some units of competency in the earlier qualifications from the *CHC08 Community Services Training Package* require assessment to occur 'on the job under the normal workplace conditions'. However, this training package provides no information about:

- how employers should contribute to learners, training and assessment, or
- how employers should be engaged in the development, delivery and monitoring of training and assessment.

Areas of non-compliance

At the initial audit, 80.3% of all RTOs audited were able to demonstrate that employers were informed and engaged in contributing to learners' training and assessment.

The training packages—either through specified work placement hours or through the requirements of individual units of competency—require students to undertake some of their training and assessment in the workplace. It is therefore essential that RTOs engage with employers.

There were a range of reasons for RTOs' non-compliance with this standard, including:

- The training organisation used purchased assessment materials that had not been contextualised or adapted to suit workplace contexts (and therefore the employer had not been involved in developing the assessment).
- The RTO provided insufficient information to employers and/or supervisors to enable them to adequately engage in training and assessment (for example, the record book which employers were asked to complete was merely a tick sheet against the performance criteria and did not outline tasks and observable behaviours).
- The RTO lacked processes to evaluate the suitability of worksites, or lacked processes to inform employers about requirements, such as requirements for access to facilities and equipment, but also requirements relating to access to the various contexts and job tasks required by particular units of competency.
- Prior to the work placements, the RTO did not provide employers with sufficient information about the skills that learners had already attained or about what skills the employer is to assist the learners to acquire and practise.
- Candidates were required to find their own work placements.
- RTOs provided insufficient information to host employers about the purpose of the placement, expectations of the placement, and their roles and responsibilities for both training and assessment.
- RTOs provide insufficient information to host employers on those employed students who are studying in distance or traineeship mode, to support their engagement in the delivery and monitoring of training and assessment.
- Employers were required to complete workplace reports, but had been provided with little guidance in relation to level of performance, as for the most part, the required skills [are] taken from the relevant unit of competency and are unsuitable for measuring the level of each student's performance.
- The workplace log merely recorded attendance—and therefore is not a suitable tool for monitoring student progress.
- There was no satisfactory agreement between the training organisation and the employer outlining the responsibilities of each of the parties in the training and assessment process.

The findings of non-compliance with this Standard indicate that although students may be undertaking work placements, in many cases, there is no systematic strategy to ensure that this work placement is integrated with structured learning and assessment.

This notion of ensuring that the work placement is about structured work-based learning is not explicitly stated in the training package.

The *Standards for NVR Registered Training Organisations 2012* require that:

Employers and other parties who contribute to each learner's training and assessment are engaged in the development, delivery and monitoring of training and assessment (16.4), and

Learners receive training, assessment and support services that meet their individual needs (16.5)

However, the Standards do not include the concept of work placement focusing on structured learning, practice and consolidation of skills and knowledge.

Example of good practice

The following examples of good practice were noted during audit:

- The RTO had excellent documentation in place for all parties, including documentation on roles and responsibilities; on the frequency and length of workplace visits for pastoral care; and for assessment purposes. The RTO conducts a workplace assessment and employer capacity check to ensure that the site is suitable. There is an interim progress report to ensure learners' progress during the work placement.
- The RTO undertakes a capacity check of workplaces to ensure learners have access to the range of contexts required in the training package (such as access to different ages of children). Employers are informed that if the workplace does not enable access to the range of contexts, their workers will need to undertake a placement at another site.
- The RTO consults employers about the program design, delivery and assessment of courses.

5.9 Support services—Standard 16.5

Requirements of the Standard

Standard 16.5 (Standard 1.7 of the 2015 Standards) requires RTOs to ensure that students receive training, assessment and support services that meet their individual needs. There is no defined approach as to how this support will be evaluated and provided; however, there is an assumption that the purpose of the support is to maximise the outcomes for the learner.

As mentioned in Chapter 3, between 23% and 25% of students enrolled in the certificate III and diploma courses do not speak English at home. Given that English is for these students at least a second language, RTOs need to consider how best to support students in their learning.

Requirements of the training package

There are no specific comments within the CHC08 Community Services Training Package or the CHC Community Services Training Package as to the level of support that the students are to be provided with. However, the *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care* specify a set number of hours that are to be completed in the workplace and some units of competency require assessment to occur in a regulated education and care service. For the earlier qualifications from the CHC08 Community Services Training Package some units of competency require assessment to occur 'on the job under the normal workplace conditions'. How students are supported in their work placements and how progress is monitored is not specified either in the CHC08 Community Services Training Package or the CHC Community Services Training Package.

Areas of non-compliance

At the initial audit, 85% of the 77 RTOs audited demonstrated that RTOs had appropriate support services to meet individual needs. Following the opportunity to address the non-compliances identified in their audit reports, the rate of compliance rose to 97.1%.

The reasons for the non-compliance at the initial audit varied. For some organisations, the issues were with a language, literacy and numeracy test that the organisation considered an appropriate method for determining the needs of learners.

In these instances, the issues resulted from:

- not applying the test to all students
- the test not being sufficiently robust to identify numeracy issues, and/or
- insufficient guidance as to how to interpret the score achieved and identify appropriate support interventions.

In one instance, the organisation (distance, online provider) did not implement a strategy to monitor the progress of students in their work placements.

Example of good practice

The following example of good practice was noted at audit:

- If a learner has a special need and requires additional support, and/or has inadequate language, literacy and numeracy skills, the RTO Manager develops a reasonable adjustment and support program for that learner in consultation with the learner and their trainers/assessors.

5.10 Monitoring of services provided on the RTO's behalf—Standard 17.3

Requirements of the standard

Standard 17.3 (Standard 2.4 of the 2015 Standards) requires RTOs to monitor all training and/or assessment services provided on their behalf to ensure that each RTO complies with all aspects of the VET Quality Framework.

This means that if an RTO delegates the provision of training and/or assessment services to another organisation, the RTO is still responsible for meeting the VET Quality Framework requirements.

In such cases, the RTO:

- is the organisation that has the qualification on its scope of delivery, and
- will be issuing the qualification or statement of attainment.

The RTO cannot devolve the responsibility of quality assuring the provision of services, and the compliance requirements relate to all Standards.

Requirements of the training package

There are no specific requirements within the training packages for how an RTO can manage these arrangements. However, as a guide, the *AQTF Users' Guide to the Essential Conditions and Standards for Continuing Registration* (2010, p. 64) suggests the following:

- *Documented agreements are in place with each organisation that provides training and/or assessment on the RTO's behalf. The agreements describe the responsibilities of each party and the management strategies to be implemented, including monitoring arrangements.*
- *The implementation of the agreement is monitored to ensure that it is being adhered to and that improvements are made, where required.*
- *Improvements to arrangements for the establishment, monitoring and implementation of agreements are demonstrated.*

Areas of non-compliance

At the initial audit, 64% of those RTOs that had agreements with other organisations to deliver training and assessment services met the requirements of the Standard. Following the opportunity to address the non-compliances identified in their audit reports, the rate of compliance rose to 88%.

The main reasons for non-compliance were:

- unsigned agreements
- out-of-date agreements (for example, agreements including inaccurate reference to units of competency)
- lack of implementation of monitoring strategies (such as orientation of training staff, validation or review of assessments), and
- lack of monitoring of workplaces for work placement (in an international setting).

5.11 Issuance of qualifications or statements of attainment— Standard 23.1

Requirements of the Standard

Standard 23.1 (Standards 3.1, 3.2, 3.3 and 3.4 of the 2015 Standards) requires RTOs to issue a person assessed as competent (in accordance with the requirements of the training package) with a VET qualification or VET statement of attainment¹⁴, as appropriate.

The qualification or statement of attainment must:

- meet the requirements of the AQF, and
- include the RTO's provider number and the Nationally Recognised Training (NRT) logo.

The AQF requirements noted in the issuance policy include that:

- AQF qualifications are correctly identified in certification documentation.
- AQF qualifications are protected against fraudulent issuance.
- A clear distinction can be made between AQF qualifications and non-AQF qualifications.
- Records of AQF qualifications issued must be kept (Australian Qualifications Framework AQF Council 2013).

¹⁴ A statement of attainment is issued for partial completion of a qualification. It includes all units of competency successfully achieved.

In addition, the National Skills Standards Council issued a policy in regards to applying the AQF requirements to the vocational education and training sector, which states that RTOs must also use the AQF logo and the Nationally Recognised Training logo (according to each of their specifications).

Consequently, RTOs are to access a range of advice to ensure compliance with the Standard.

Requirements of the training package

The training package does not include specific requirements for issuing qualifications. However, RTOs need to ensure that specific details listed within the training package (such as qualification codes and titles) are reported accurately on qualifications and statements of attainment.

Areas of non-compliance

At audit, 64.6% of the 77 RTOs complied with the Standard. Following the opportunity to address the non-compliances identified at audit, the rate of compliance rose to 95%.

The issues of concern ASQA identified at audit included:

- outdated course nomenclature and references to outdated information (such as legislation, employability skills, superseded units of competency)
- lack of identification of the RTO
- inaccurate register or no register of testamurs issued
- inappropriate use of AQF logo on statement of attainment
- lack of distinction between a statement of attainment and that of a certificate
- lack of fraud protection, and
- lack of information about the language of instruction (for an organisation that was providing training offshore).

Examples of good practice

The following examples of good practice were noted among the RTOs specifically audited for this review:

- The RTO had procedures, timeframes and a checklist to ensure certificates are issued in a timely manner.
- An RTO verified the identity of online learners through a face-to-face or Skype induction, which is completed before learners progress with the course. A tour of Moodle is conducted and learners are guided through the module and shown how to access key documents (such as policies and procedures).
- To verify the learner's work is his or her own, trainers at an RTO conduct at random a 'verification assessment' task that tests learners on the tasks submitted. These forms are available on the server for each cluster of work. Trainers select a sample of learners each month to conduct the verification on and are encouraged to use these questions if they doubt the work is not a learner's own at any stage of the assessment process.
- Proof of identification is required as part of the RTOs general enrolment process.

5.14 Ethical and accurate marketing—Standard 24.1

Requirements of the Standard

Standard 24.1 (Standard 4.1 of the 2015 Standards) requires an RTO to ensure its marketing and advertising of AQF and VET qualifications to prospective clients is ethical, accurate and consistent with its scope of registration.

Requirements of the training package

The training package does not have specific requirements in relation to marketing; however, RTOs need to ensure accurate details within the training package (such as qualification codes and titles and completion requirements) are included in marketing material.

Areas of non-compliance

At audit, 75.8% of the 77 RTOs complied with the Standard. Following the opportunity to address the non-compliances identified in their audit report, the rate of compliance rose to 89.2%.

The reasons for non-compliance were varied but generally related to:

- inaccurate unit of competency codes or titles
- inaccurate code or title of qualifications
- reference to superseded qualifications beyond the transition period
- inaccurate information in relation to the training and assessment strategy (such as information on hours, duration, core and elective mix and entry requirements)
- inaccurate information in relation to mandatory work placement requirements for newly added CHC Community Services Training Package qualifications
- inaccurate reference to partnering arrangements with another organisation (arrangements that were not in place)
- out-of-date references (e.g. to the Australian Quality Training Framework rather than the VET Quality Framework), and
- inaccurate use the Nationally Recognised Training logo and/or logo of the state/territory regulator.

5.15 Transition to training packages—Standard 25.1

Requirements of the Standard

Standard 25.1 (Standards 1.26 and 1.27 of the 2015 Standards) requires RTOS to manage the transition from superseded training packages within 12 months of their publication on the national register so that RTOs only deliver currently endorsed training packages.

ASQA has also provided additional guidance about transition arrangements.

An RTO must transfer current students of a superseded qualification or unit of competency into the replacement qualification or unit:

- as soon as practicable, and
- no later than 12 months from the date the superseded training product is updated on the national register.

Students who have not completed a superseded qualification within 18 months—or a superseded unit of competency within 12 months—following the item being superseded on the national register must be

immediately issued with any AQF testamur for which they are eligible and transferred to a new qualification or another RTO.

Once a replacement qualification or unit of competency is published on the national register, an RTO may still commence training or assessment of a new student in that training product for a limited period. Once the superseded qualification or unit is removed from the RTO's scope of registration on the national register, the RTO cannot commence training/assessing a student in that qualification.¹⁵

During the audit of the 30 RTOs specifically audited for this review, the teach-out period (the period allowed to continue teaching a superseded qualification) ended on 6 November 2013 for *CHC30708 Certificate III in Children's Services*. RTOs should have transitioned all current students to the later qualification *CHC30712 Certificate III in Children's Services* or the *CHC30113 Certificate III in Early Childhood Education and Care*.

Requirements of the training package

The development and endorsement process for training packages is managed by an Industry Skills Council. This body is contracted by the Australian Government to develop and maintain training packages. Once a training package is approved it has an endorsement date. It is this date that informs the transition process.

Areas of non-compliance

At audit, 86.7% of all 77 RTOs audited were able to show compliance with the Standard. Following the opportunity to address the non-compliances identified in their audit report, the rate of compliance rose to 94.2%.

Focusing only on the 30 RTOs specifically audited for this review, for which more information is available, five organisations (16%) were not compliant with this Standard at initial audit.

This means that five RTOs had students (between one and 202) enrolled in an expired qualification. All organisations should have either:

- completed the students in the expired qualification, or
- issued them with a statement of attainment and enrolled them in a current qualification and applied any credit transfer requirements.

Example of good practice

An example of good practice noted was:

- An RTO was planning well ahead for transition, identifying students and preparing resources.

¹⁵ ASQA removes a superseded training package qualification or unit of competency from an RTO's scope of registration on the national register upon expiry of the 12 month period following publication of it having been replaced unless a provider specifically applies to ASQA to have the qualifications/unit removed earlier.

Chapter 6 Findings

Responsibility for early childhood education and care training extends to RTOs, government agencies, organisations and individuals. This final section of the report reflects on what is already being done by some agencies, and makes recommendations for further actions that could be taken by agencies to improve the quality of training outcomes in the early childhood education and care training sector.

The findings of the early childhood education and care training strategic review are similar to those of ASQA's aged and community care strategic review (2013) and in many instances the same recommendations apply here.

Because of the levels of non-compliance among the RTOs that offer early childhood education and care qualifications, ASQA should continue to focus on short course delivery in its regulatory activity. By doing this, ASQA can monitor changes to the quality of training outcomes and give a high priority to the areas of concern identified by this review—particularly assessment.

As previously mentioned in this report, ASQA requires all RTOs to demonstrate compliance with the requirements of the relevant national standards and the training package. Where there are non-compliances found at an audit, RTOs have the opportunity to provide evidence that they have taken action to rectify this non-compliance. Where non-compliance remains, ASQA takes further regulatory action, including imposing sanctions. The high levels of non-compliance at initial audit are of concern and RTOs offering early childhood education and care training will require further and ongoing regulatory scrutiny.

Through the stakeholder consultation undertaken for this review, many providers of early childhood education and care expressed the view that some RTOs that issued qualifications to learners were not adequately preparing them for the workforce by providing proper training and assessment. That is, the learners and their future employers were 'being let down'. This perception was reinforced by the audit results and levels of RTO compliance discussed in Chapter Five. The audit findings indicate that in many instances, work placements that are supposed to provide structured learning and appropriate assessment for students are not managed correctly.

A significant issue that has been identified through this review is that too many RTOs are delivering courses in much less time than the AQF specifies. It is likely that short course delivery has contributed to the poor training and assessment identified by stakeholders and the auditing of RTOs.

Recommendation 1

It is recommended that—as a matter of urgency—the new training package arrangements which are currently being developed include minimum benchmarks around the amount of training required for each unit of competency and each VET qualification across the whole VET system.

ASQA's risk-based regulation relies on data and intelligence to enable it to regulate effectively and, where appropriate, sanction RTOs. It would assist ASQA considerably if providers of early childhood education and care could report their concerns about RTOs directly to ASQA in order for ASQA to evaluate those concerns and take action.

Recommendation 2

It is recommended that ASQA, Australian Children’s Education and Care Quality Authority, and other relevant stakeholders work with the peak bodies that represent the providers of early childhood education and care to improve the process for, and coverage of, early childhood education and care providers informing ASQA of concerns they may have about the quality of training and assessment provided by RTOs.

During the period of this strategic review, the training packages and their qualifications were in transition from an older version of the package to a newer version. As mentioned in Chapter 5, during the audits of the 30 RTOs specifically audited for this review, the ‘teach out’ period ended for *CHC30708 Certificate III in Children’s Services* and this qualification expired on 6 November 2013. Therefore, RTOs should have transitioned all current students to the current qualification *CHC30712 Certificate III in Children’s Services* or the *CHC30113 Certificate III in Early Childhood Education and Care*.

The end of the ‘teach-out’ period was 29 December 2014 for *CHC50908 Diploma of Children’s Services (Early Childhood Education and Care)*—this qualification expired on 30 December 2014. In addition, *CHC30712 Certificate III in Children’s Services* expired on 1 January 2015. The *CHC30113 Certificate III in Early Childhood Education and Care* and the *CHC50113 Diploma of Early Childhood Education and Care* were therefore not fully implemented within RTO’s training and assessment services at the time of this review.

The systemic poor practices identified through this review indicate that many RTOs delivering early childhood qualifications are not complying with the training packages or the Standards relating to employment in the early childhood education and care sector. This demonstrates:

- a clear need for these RTOs to improve their training and assessment services, and
- the need for ASQA and the relevant training package developer to explain the key findings of this review to all RTOs delivering early childhood education and care qualifications.

Recommendation 3

It is recommended that ASQA—working with the relevant training package developer—develop and implement a systematic communications strategy to engage with RTOs delivering early childhood education and care, in order to explain and reinforce the key findings of this review.

The findings of this review indicated that RTOs may have had difficulty with transitioning to the CHC Community Services Training Package (2013 release) and this may have led to some not being able to demonstrate compliance with the Standards. It is important that this proposition is tested once the new training packages have been in place for a year.

In addition, the findings of the review indicated that there was a high proportion of distance learning (including online) occurring. Both employers and the Productivity Commission report (2011a) queried the suitability of this mode of delivery.

Recommendation 4

It is recommended that towards the end of 2015 ASQA undertakes:

- a targeted strategic audit on the implementation of *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care*, and
- a targeted strategic audit of distance learning, including online delivery of early childhood education and care training.

The Community Services and Health Industry Skills Council is responsible for the development and maintenance of the Community Services Training Package (which includes the early childhood care and education qualifications). The Productivity Commission (2011) recommended that the training package should:

- contain rigorous, auditable assessment requirements for each unit of competency
- require practical skills to be demonstrated in a workplace environment (p. XLVII).

Since the publication of the Productivity Commission research report *Early Childhood Development Workforce* (November 2011), the Industry Skills Council developed and released the Community Services Training Package (in 2013). The assessment requirements have changed since the *CHC08 Community Services Training Package*. For example, units of competency within the *CHC08 Community Services Training Package* required that:

The individual being assessed must provide evidence of specified essential knowledge and skills.

This unit must be assessed on the job under the normal workplace conditions for a range of age groups, a range of conditions over a number of assessment situations.

Assessment of competency may be conducted on one or more occasions.

From *CHCPR301B Provide experiences to support children's play and learning*

Whereas units of competency in the CHC Community Services Training Package released in 2013 require, for example, that:

Skills must be demonstrated in a regulated education and care service.

In addition, simulations and scenarios must be used where the full range of contexts and situations cannot be provided in the workplace or may occur only rarely.

and for performance evidence:

There must be demonstrated evidence that the candidate has completed the...tasks at least once...including...provided care and responded appropriately to at least three children of varying ages'.

From *CHCECE003 Provide care for children*

For both versions of units of competency, the Community Services and Health Industry Skills Council advised that assessors need to undertake the assessment in the workplace, or at least assess the performance evidence (as opposed to the knowledge evidence in the CHC Community Services Training Package units of competency) in the workplace. In the case of the CHC Community Services Training Package, the Community Services and Health Industry Skills Council advised that the simulation and scenarios are to be used only for the gap (in performance) not able to be observed in the workplace by the assessor.

As noted in [Chapter 4 Stakeholder Perspectives](#), there was no common understanding of the term 'workplace assessment'. As early as 1993, Hager defined workplace assessment, as 'any assessment of performance in an actual workplace setting' (Hager 1993, p. 88). He noted that workplaces differ from training sites, in terms of both physical environment and time demands.

The audit findings indicated that RTOs were unclear about what comprises 'workplace assessment'. Analysis of audit evidence indicated that there are a range of possible methods that RTOs could use to meet the *assessment in the workplace* requirement. As discussed in Chapter 5, RTOs have differing interpretations of this requirement, with interpretations including:

- expecting an assessor to observe performance of the candidate while on work placement
- using only third-party reports as evidence of workplace performance, and
- requiring that candidates submit a portfolio of workplace documents and note how they have demonstrated the tasks.

At least 10 of the 30 RTOs specifically audited for this review had difficulty demonstrating that they could meet the requirement for the assessor to observe (at least in part) behaviours in the workplace. It appears that the advice contained in the unit of competency's Assessment Requirements may provide insufficient guidance to RTOs to ensure that they comply with the explicit (or implicit) requirements.

As noted above, in the CHC Community Services Training Package (2013 release), the revised units of competency outline in the performance evidence section of the Assessment Requirements that 'there must be demonstrated evidence that the candidate has completed the ... tasks at least once ... including ... provided care and responded appropriately to at least three children of varying ages' (*CHCECE003 Provide care for children*), whereas older versions of competencies require assessment 'for a range of age groups, a range of conditions over a number of assessment situations'.

Competency is defined as the 'consistent application of knowledge and skill to the standard of performance required in the workplace. It includes the ability to transfer and apply skills and knowledge to new situations and environments.' (National Quality Council 2010). Competency-based assessment requires the assessor to synthesise evidence and make a decision of competence (either 'not yet competent' or 'competent'). The summative assessment, as such, occurs only once but the evidence may be gathered or observed and evaluated over a period of time.

Units of competency in the CHC Community Services Training Package (2013 release) require the learner to be observed completing tasks at least once; however, this may not elicit sufficient evidence to determine competence. In addition, the training package's emphasis on observation of specific tasks ignore other attributes that underpin competent performance (Hager 1993, p. 96) and may also lead to 'an observer simply ticking off a checklist of discrete tasks' (Hager 1993, p. 96).

Early literature pertaining to development of competency standards (such as Bowden and Masters 1993) cautions against developing narrowly defined competency standards. 'Bodies developing competency standards in Australia are encouraged to begin with a consideration of the general purpose and function of an occupation rather than the tasks and procedures required of specific jobs' (Bowden and Masters 1993, p. 46). Narrowly defined tasks in effect become the competency and the heavy reliance of RTOs on assessing units of competency in isolation 'ignores the possibility that the coming together of tasks might lead to their transformation, that is it is assumed that the whole is not greater than the sum of its parts' (Hager 1993, p. 95).

Getting the balance right is a difficult task for training package developers; there has been a tendency to put further detail and requirements related to performance and assessment into units of competency with the aim of improving the validity of assessment decisions. Although the CHC Community Services Training Package adheres to the new streamlined format, the balance between broad occupation

functions and narrowly defined competencies may have been compromised, possibly leading to over-specification of tasks, and a loss of the holistic nature of competence.

Recommendation 5

It is recommended that any revisions of the Community Services Training Package include reviewing the clarity of wording and expectations of assessment evidence in the units of competency, in order to ensure that advice is unambiguous, clear, and aligned with the definition of competency and the rules of evidence.

The Community Services Training Packages require work placements—to undertake assessment and also for students to learn and consolidate skills and knowledge—either:

- implicitly, through requirements of units of competency (as is the case with units for the CHC08 package), or
- explicitly, where the requirement is stated clearly within specific units of competency (as is the case with the new package introduced in 2013).

In almost all instances, RTOs included work placement within their delivery mode. However, findings of the review of Standard 15.5 (Standard 1.8 of the 2015 Standards) (assessment) and Standard 16.4 (Standards 1.5 and 1.6 of the 2015 Standards) (engagement with industry) demonstrated that RTOs were not engaging well with employers in order to provide structured workplace learning to maximise the outcomes for learners and provide adequate strategies for assessment.

The Community Services and Health Industry Skills Council in the *Implementation guide for CHC Community Services Training Package* (2013, pp. 44 and 45) indicated that:

To successfully conduct training and assessment in the workplace, the RTO must provide the learner and workplace supervisor with an agreed, structured learning plan that indicates the purpose of the work placement and the minimum requirements for training and assessment in the specified units of competency. It should also clearly identify training, monitoring and assessment roles and responsibilities of both parties... which states that employers and other parties who contribute to each learner's training and assessment must be engaged in the development, delivery and monitoring of training and assessment.

Work placements should always involve the appropriate supervision and guidance from individuals in the workplace and trainers and assessors from the RTO.

The importance of work placement in vocational education and training is an issue that is internationally recognised. However, structured workplace learning involves more than just placing learners in the workplace in the hope that they learn skills and knowledge. It involves the trainer/assessor planning, with the workplace representatives and the learning that needs to occur. The purpose of structured workplace learning and engaging employers in this process is included in Standard 16.3 (Standards 5.1 and 5.2 of the 2015 Standards), which requires:

Employers and other parties who contribute to each learner's training and assessment are engaged in the development, delivery and monitoring of training and assessment.

The inability of RTOs to structure workplace learning and assessment raises a range of other issues, including:

- poor development of workplace skills and knowledge, and
- poor workplace assessment practice.

Examples of poor development of skills and knowledge included the inability of RTOs to provide work placements as 'structured learning', rather than as 'work experience'. Examples of poor workplace assessment practice included the RTOs' inability to schedule work placements to enable timely assessment of units of competency, or indeed to undertake workplace assessments at all. These issues were further demonstrated by:

- certain RTOs' lack of engagement with employers
- RTOs not informing employers of their roles and responsibilities in the process
- RTOs failing to inform employers of the status of individual student progress prior to commencement of the placement, and
- RTOs' inability to support and monitor the progress of students while in work placement.

Recommendation 6

Given that most RTOs reviewed did not effectively embed structured work placement into the learning and assessment strategies—as well as the high level of non-compliance against the assessment standard (Standard 15.5 [Standard 1.8 of the 2015 Standards])—it is recommended that RTOs strengthen engagement with industry employers to ensure that structured workplace learning and assessment is embedded in course delivery.

The issue of insufficient or inadequate resources becomes critical when there is no work placement linked to the training and assessment strategy.

ASQA's analysis of the audit findings indicated that some RTOs require students to find their own work placements. This approach means that:

- the RTO may not be compliant with Standard 15.3 (Standards 1.3, 1.5 and 1.6 of the 2015 Standards—resources and facilities—as it may not be able to demonstrate the capacity to deliver and assess according to the requirements of the training package, and
- the RTO may not be able to demonstrate the ability to simulate a workplace environment for assessment, and therefore, may not be able to meet the requirements of Standard 15.5 (Standard 1.8 of the 2015 Standards).

The resources to adequately simulate a workplace environment are critical to meeting the requirements of the most recent Community Services Training Package qualifications. The *Implementation Guide for CHC Community Services Training Package* (October release 2013) indicates that ideally assessment should be integrated, and that if workplace assessment of a unit of competency is not practical, a simulated environment may be used to supplement assessment in the workplace.

Therefore, to ensure that all aspects of a unit of competency can be demonstrated, RTOs require an adequately simulated environment. The implementation guide also emphasises that the simulated environment must replicate real-life working conditions, providing all the required equipment and conditions of a working environment, including interactions with clients and coworkers.

Analysis of the audit findings indicates that a large proportion of RTOs could not adequately simulate a workplace environment to supplement workplace assessment, despite some good practice being demonstrated. Coupled with this were examples provided by RTOs where workplaces did not allow students to undertake typical workplace tasks, such as changing babies' nappies.

Recommendation 7

It is recommended that any revisions to training packages clearly identify any requirements in each unit of competency for:

- workplace delivery and assessment
- delivery and assessment to be undertaken in a simulated workplace context (including what constitutes an appropriate workplace assessment in each case), and
- repeated demonstration of competencies in the workplace (including what that means for each unit of competency).

Concerns have been raised about the quality of assessments and the relative comparability of qualifications issued by individual RTOs across the Australian VET sector (for example AWPA, 2013; Skills Australia, 2011; Hoeckel, Moonhee, Simon, and Troy, 2008; Precision Consultancy, 2008; Service Skills SA, 2012).

Recent research into VET practitioners' capability in interpreting competencies indicated that 'the process of reading, analysing and interpreting texts is highly complex' (Hodge 2014 p. 7) and that VET practitioners were experiencing difficulty reading, analysing and interpreting competencies. The research indicated 'that close alignment between the content of competencies and the interpretation of this content may not be the reality of VET practice in Australia' (p. 27).

The findings of this strategic review confirm that the highest level of non-compliance is with the assessment standard (Standard 15.5 [Standard 1.8 of the 2015 Standards]) and that RTOs have the most difficulty complying with this standard and to gain compliance following a period of rectification. The findings of the strategic review indicate that assessors and assessment-tool developers lack the capability to interpret the requirements of the units of competency. In addition, RTOs lack the capacity to put into practice assessment approaches that meet the requirements of the training package.

Hodge (2014) noted the research 'indicates that the difficulties VET practitioners have in interpreting competencies may be due to limitations in initial training and education, as well as few opportunities to engage in continuing training education focused on interpretation' (p. 7). Hodge (2014) also noted that the language (jargon) of training packages inhibits interpretation. Hodge (2014) stated that the acquisition of complex skills may require longer periods of professional support and that appropriate models—such as supervised practice—could be utilised to support learning. He recommended that both initial training, and continuing education and professional development opportunities, further emphasise interpretation of competencies as a key component.

Recommendation 8

It is recommended that at the next review of the Certificate IV in Training and Assessment:

- the assessment related units of competency emphasise the analysis and interpretation of competencies, and
- consideration is given to the development of qualifications in VET assessment that could be introduced to supplement the current assessment capabilities of many assessors who currently hold the *TAE40110 Certificate IV in Training and Assessment* (or other qualifications that are considered to be equivalent).

It is recommended that when RTOs develop training materials for a revised Certificate IV in Training and Assessment, that they strengthen the learning and formative assessment activities related to the analysis and interpretation of competencies, in order to enhance the skills and knowledge of assessors in this area.

Coupled with the issue of quality of assessment practices is the effectiveness of validation processes to drive continuous improvement of assessment. The current standard (Standard 15.5 [Standard 1.8 of the 2015 Standards]) states that validation should be systematically implemented. However, the findings of the strategic review found that although validation was systematically implemented, it did not necessarily identify issues with assessment and therefore did not provide for continuous improvement of assessment.

The newly revised national Standards (released October 2014) indicate that validation of assessment is again to be undertaken 'systematically' but is to be undertaken by person/s who are not directly involved in the training or assessment delivery of that qualification. The aim of this strengthened standard is to improve the rigour of validation and the validity of assessment.

Recommendation 9

Given the issues with assessment that have been identified in this and the 2013 strategic reviews (ASQA 2013a and 2013b), it is recommended that ASQA:

- continue to focus on assessment and the implementation of validation strategies in its regulatory work, and
- continue to monitor the effectiveness of the strengthened validation requirements.

The findings of this strategic review support stakeholder concerns about the qualifications, vocational skills, experience and currency requirements of trainers and assessors delivering early childhood education and care training. The findings of recent research (Clayton, Jonas, Harding, Harris and Toze 2013) consider:

'... industry currency (or the lack of it) to be a significant risk factor for audit compliance, particularly for the assessment of training. Trainers and assessors with a limited understanding of how the industry operated would be unable to ensure that training was relevant and that the assessment met the needs and standards of industry. The auditors considered that the ability to exercise professional judgment in assessment would be compromised by a lack of currency' (Clayton et al 2013, p. 19).

The findings of the research also indicated that strategies to maintain currency, which varied across the groups interviewed (employers, knowledge-based organisations and auditors), included strategies such as:

- attendance at trade events, reading industry magazines, undertaking online research and engaging in industry networks (favoured by employers)
- participation in conferences, technical seminars, industry events and networking (favoured by knowledge-based organisations), and
- evidence of planning for maintaining industry currency and the application of any learning gained through updating activities (the focus of auditors).

Therefore the emphasis was not about the strategies themselves, but rather, how the ongoing learning was taken up and used to inform teaching practice (Clayton et al 2013, p. 8).

The findings of the research (Clayton et al 2013) indicated that there was some confusion within the 2012 Standards relating to industry currency and competence. The findings indicated that there needed to be 'clarification of the terms and greater consideration of what constituted appropriate evidence of industry currency' (p. 8).

Clayton et al (2013) indicated the auditors interviewed:

viewed industry currency as a component of vocational competence but not necessarily as interchangeable with industry competence, which was a broader concept. One auditor described industry currency as being 'the maintenance and extension of vocational competence' (Clayton et al 2013, p. 18).

Whereas industry skills council representatives interviewed indicated that:

Industry currency was an element of vocational competency, with one commenting that vocational competence was a deeper level of understanding and experience, one that underpinned a person's knowledge and lasted longer than industry currency. (Clayton et al 2013, p. 18).

The new national Standards (October 2014) include revised requirements for trainers and assessors. The focus of the revised Standards is clearly on vocational competence and currency. The findings from this strategic review indicate that establishing vocational competence of trainers and assessors, as well as maintaining vocational and training and assessment currency is difficult for RTOs to demonstrate. Good practice examples indicate that well planned and implemented professional development forms the basis for meeting these requirements.

Recommendation 10

It is recommended that RTOs develop or enhance their ongoing professional development processes by:

- providing advice as to relevant professional development for trainers and assessors, and
- investigating more systematic models that will assist trainers and assessors to demonstrate compliance with the Standard.

Concluding comment

The future projections for the early childhood education and care sector indicate that there will be a continuing national shortage of child care workers, especially those with a diploma level qualification. In 2013, the Community Services and Health Industry Skills Council also indicated that—in order to meet the new requirements and increased demand for services—the number of child carers employed in Australia needed to increase by 15,500 (13%) between 2012 and 2017 (CSHISC 2014b). Projections by the Department of Employment (2014) indicate that this figure may be higher, and that employment in child care services is projected to grow by 21,600 (or 21.8%) between 2013 and 2018.

The role that RTOs play in meeting this demand is critical and the findings of this strategic review indicate that the VET sector may not be adequately equipped to ensure that there are suitably skilled workers in the sector.

List of acronyms

Acronym	Definition
ACECQA	Australian Children's Education and Care Quality Authority
AQF	Australian Qualifications Framework
AQTF	Australian Quality Training Framework
ASQA	Australian Skills Quality Authority
CCB	Child Care Benefit
CCR	Child Care Rebate
COAG	Council of Australian Governments
CSHISC	Community Services and Health Industry Skills Council
ECA	Early Childhood Australia
ECEC	Early Childhood Education and Care
ESOS	Education Services for Overseas Students
FDC	Family day care
LDC	Long day care
NQF	National Quality Framework
NRT	Nationally recognised training
NSSC	National Skills Standards Council
NVR	National VET Regulator
OCC	Occasional child care
OSHC	Outside school hours care
RPL	Recognition of prior learning
RTO	Registered training organisation
VET	Vocational Education and Training
VRQA	Victorian Registration and Qualifications Authority

Glossary

Term	Definition
Assessment	<p>Means the process of collecting evidence and making judgements on whether competency has been achieved, to confirm that an individual can perform to the standard expected in the workplace, as expressed by the relevant endorsed industry/enterprise competency standards of a training package or by the learning outcomes of a VET accredited courses</p> <p>Source: <i>Standards for NVR Registered Training Organisations 2012</i> www.comlaw.gov.au</p>
Assessment tools	<p>An assessment tool includes the following components: the context and conditions for the assessment, the tasks to be administered to the candidate, an outline of the evidence to be gathered from the candidate and the evidence criteria used to judge the quality of performance (that is the assessment decision-making rules). It also includes the administration, recording and reporting requirements.</p>
Authenticity	<p>One of the rules of evidence. To accept evidence as authentic, an assessor must be assured that the evidence presented for assessment is the candidate's own work.</p>
Compliance audit	<p>An audit conducted, under Section 35.1 of the <i>National Vocational Education and Training Regulator Act 2011</i>, to assess whether or not NVR RTOs continue to comply with the Act or the VET Quality Framework.</p>
Course	<p>Course means a course of vocational education and training.</p>
Non-compliance	<p>The evidence reviewed during an audit indicates that the requirements of VET Quality Framework have not been met.</p>
Principles of assessment	<p>To ensure quality outcomes, assessment should be fair, flexible, valid, and reliable.</p> <p>Fairness</p> <p>Fairness in assessment requires consideration of the individual candidate's needs and characteristics, and any reasonable adjustments that need to be applied to take account of them.</p> <p>It requires clear communication between the assessor and the candidate to ensure that the candidate is fully informed about, understands, is able to participate in, the assessment process, and agrees that the process is appropriate. It also includes an opportunity for the person being assessed to challenge the result of the assessment and to be reassessed if necessary.</p> <p>Flexibility</p> <p>To be flexible, assessment should reflect the candidate's needs; provide for recognition of competencies no matter how, where or when they have been acquired; draw on a range of methods appropriate to the context, competency and the candidate; and, support continuous competency development.</p>

Term	Definition
	<p>Reliability</p> <p>One of the principles of assessment. There are five types of reliability: internal consistency, parallel forms, split-half, inter-rater and intra rater. In general, reliability is an estimate of how accurate or precise the task is as a measurement instrument. Reliability is concerned with how much error is included in the evidence.</p> <p>Validity</p> <p>One of the rules of evidence and one of the principles of assessment.</p> <p>There are five major types of validity: face, content, criterion (that is predictive and concurrent), construct and consequential. In general, validity is concerned with the appropriateness of the inferences, use and consequences that result from the assessment. In simple terms, it is concerned with the extent to which an assessment decision about a candidate (for example competent/not yet competent, a grade and/or a mark), based on the evidence of performance by the candidate, is justified.</p> <p>It requires determining conditions that weaken the truthfulness of the decision, exploring alternative explanations for good or poor performance, and feeding them back into the assessment process to reduce errors when making inferences about competence.</p> <p>Unlike reliability, validity is not simply a property of the assessment tool. As such, an assessment tool designed for a particular purpose and target group may not necessarily lead to valid interpretations of performance and assessment decisions if the tool was used for a different purpose and/or target group.</p>
recognition of prior learning (RPL)	<p>Means an assessment process that assesses an individual's formal, non-formal and informal learning to determine the extent to which that individual has achieved the required learning outcomes, competency outcomes, or standards for entry to, and/or partial or total completion of a VET qualification.</p> <p>Source: <i>Standards for NVR Registered Training Organisations 2012</i> www.comlaw.gov.au</p>
Registration audit	<p>An audit undertaken to assess an application for:</p> <ul style="list-style-type: none"> • initial registration as an RTO • renewal of registration as an RTO, or • change to the scope of registration of an RTO. <p>Any audit undertaken under the NVR Act that is not a registration audit is a compliance audit.</p>
Registered training organisation (RTO)	<p>A training organisation registered by a national, state or territory registering body.</p>

Term	Definition
Rules of evidence	<p>These are closely related to the principles of assessment and provide guidance on the collection of evidence to ensure that it is valid, sufficient, authentic and current.</p> <p>Validity</p> <p>There are five major types of validity: face, content, criterion (that is predictive and concurrent), construct and consequential.</p> <p>In general, validity is concerned with the appropriateness of the inferences, use and consequences that result from the assessment.</p> <p>In simple terms, it is concerned with the extent to which an assessment decision about a candidate (for example competent/not yet competent, a grade and/or a mark), based on the evidence of performance by the candidate, is justified.</p> <p>It requires determining conditions that weaken the truthfulness of the decision, exploring alternative explanations for good or poor performance, and feeding them back into the assessment process to reduce errors when making inferences about competence.</p> <p>Unlike reliability, validity is not simply a property of the assessment tool. As such, an assessment tool designed for a particular purpose and target group may not necessarily lead to valid interpretations of performance and assessment decisions if the tool was used for a different purpose and/or target group.</p> <p>Sufficiency</p> <p>One of the rules of evidence. Sufficiency relates to the quality and quantity of evidence assessed. It requires collection of enough appropriate evidence to ensure that all aspects of competency have been satisfied and that competency can be demonstrated repeatedly.</p> <p>Supplementary sources of evidence may be necessary. The specific evidence requirements of each unit of competency provide advice on sufficiency.</p> <p>Authenticity</p> <p>To accept evidence as authentic, an assessor must be assured that the evidence presented for assessment is the candidate's own work.</p> <p>Currency</p> <p>In assessment, currency relates to the age of the evidence presented by candidates to demonstrate that they are still competent. Competency requires demonstration of current performance, so the evidence must be from either the present or the very recent past.</p>

Sampled audit
(randomly sampled
audit)

Reviews and examinations of any aspects of NVR RTOs operations to determine any systemic issues relating to the quality of vocational education and training.

Term	Definition
Simulated work environment	<p>The requirement for a unit of competency to be assessed in a simulated workplace environment may be identified either within the unit of competency itself or within the relevant training package assessment guidelines.</p> <p>A simulated workplace may be required for the following reasons:</p> <ul style="list-style-type: none"> • the learner may not have access to a workplace • the available workplace may not use the relevant skill, equipment or process, and • conducting assessments may be disruptive or interfere with work requirements—for example there may be ethical, privacy or confidentiality issues to consider • it may not be appropriate to apply the skills in the workplace due to potential risks such as health and safety, or equipment being damaged <p>For the purposes of assessment, a simulated workplace may be described as one in which all of the required skills are performed with respect to the provision of paid services to an employer or the public can be demonstrated as though the business was actually operating.</p> <p>In order to be valid and reliable, the simulation must closely resemble what occurs in a real work environment.</p> <p>The simulated workplace should involve a range of activities that reflect real work experience. The simulated workplace should allow the performance of all of the required skills and demonstration of the required knowledge.</p> <p>It is critical that when a simulated workplace is being set up, the assessor is thoroughly familiar with the competency standard/s, as well as experienced in the current circumstances and environment of the workplace.</p> <p>In deciding whether a simulation or an assessment environment has been adequately set up, the following should be considered.</p> <p>Are there opportunities to:</p> <ul style="list-style-type: none"> • test the full range of equipment • use up-to-date equipment and software • reflect times and deadlines • show the complexity of dealing with multiple tasks • involve prioritising among competing tasks • deal with customers, including difficult ones • work with others in a team • communicate with diverse groups • find, discuss and test solutions to problems • explore health and safety issues • answer practically oriented, applied-knowledge questions, and • show the level of written and verbal expression sufficient for, but not exceeding, the work requirements. <p><i>Source: 2010 AQTF User's Guide to the Essential Conditions and Standards for Initial Registration. http://natese.gov.au/?a=69353</i></p>

Term	Definition
Training and assessment strategy	A framework that guides the learning requirements and the teaching, training and assessment arrangements of a vocational education and training qualification. It is the document that outlines the macro-level requirements of the learning and assessment process, usually at the qualification level.
Unit of competency	Means the specification of industry knowledge and skill, and the application of that knowledge and skill to the standard of performance expected in the workplace.
Vocational education and training (VET)	Post-compulsory education and training, excluding degree and higher-level programs delivered by higher education institutions, which provides people with occupational or work-related knowledge and skills. VET also includes programs that provide the basis for subsequent vocational programs. Alternative terms used internationally include technical and vocational education and training (TVET), vocational and technical education and training (VTET), technical and vocational education (TVE), vocational and technical education (VTE), further education and training (FET), and career and technical education (CTE).
VET Quality Framework	<p>At the time of this review, it comprised:</p> <ul style="list-style-type: none"> • the <i>Standards for NVR Registered Training Organisations 2012</i> • the Fit and Proper Person Requirements • the Financial Viability Risk Assessment Requirements • the Data Provision Requirements, and • the Australian Qualifications Framework.
training.gov.au	Training.gov.au is the official National Register of VET in Australia and is the authoritative source of information on training packages, qualifications, accredited courses, units of competency, skill sets and registered training organisations.

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Appendix A: List of Steering Committee representatives

Christopher Robinson (Chair)

Australian Skills Quality Authority (ASQA)

Dorothy Rao

Community Services and Health Industry Skills Council (CSHISC)

Don Hudgson

Victorian Registration and Qualifications Authority (VRQA)

Genevieve Watson

Australian Government Department of Industry (Department of Education and Training)

Gerard Westenberg

Training Accreditation Council Western Australia

Jeremy Hodes

Australian Government Department of Industry (Department of Education and Training)

Kim Bertino

Australian Community Children's Services

Michael Farrell

Family Day Care Australia

Rhonda Livingstone

Australian Children's Education and Care Quality Authority (ACECQA)

Samantha Page

Early Childhood Australia (ECA)

Suzanne Northcott

Australian Government Department of Education (responsibility for early childhood education and care workforce matters are now the responsibility of Department of Social Services)

Tamika Hicks

United Voice

Appendix B: Review methodology

The findings of the review were informed by three components: context and background; audits of RTOs offering training in child care and early childhood learning; and consultation with and surveying of RTOs. The following strategies were used.

A2.1 Context and background data

Various reports, environmental scans and census data were reviewed to inform the review. This included especially:

- the Productivity Commission's 2011 report, *Early Childhood Development Workforce*
- data related to delivery of training by RTOs including: RTO numbers, national distribution of RTOs and student numbers, and
- data related to the provision of early childhood education and care including provider type and number, national distribution and early childhood enrolments and graduations.

A2.2 Consultations and survey

Consultations

Consultation with key stakeholders occurred in a number of ways through:

- opportunities identified by committee members such as attendance at forums and workshops
- focus groups, and
- formal roundtable meetings with stakeholders initiated for the review.

Consultations with stakeholders in the early childhood sector were undertaken in May 2014 in Brisbane, Melbourne and Sydney with teleconferences to NSW (Bondi Junction), Tasmania (Hobart) and South Australia (Robe).

Organisations consulted included:

- not-for-profit organisations
- peak bodies
- RTOs, and
- associations and other stakeholder groups.

Survey

As part of this review, one survey was conducted of ASQA registered training organisations offering early childhood education and care training.

In 2014, ASQA surveyed ASQA-regulated RTOs approved to deliver early childhood education and care qualifications at the Certificate III and diploma levels.

The aim of the survey was to:

- provide more detailed information about the nature of early childhood education and care training delivery by RTOs that were registered with ASQA to deliver such training, and
- inform the development of any audits undertaken for this national strategic review of early childhood education and care training.

There is a range of qualifications delivered by RTOs for the early childhood education and care sector. The most current of these include:

- *CHC30708 Certificate III in Children’s Services* (superseded)
- *CHC30712 Certificate III in Children’s Services* (superseded)
- *CHC30113 Certificate III in Early Childhood Education and Care*
- *CHC50908 Diploma of Children’s Services (Early Childhood Education and Care)* (superseded)
- *CHC50113 Diploma of Early Childhood Education and Care*.

RTOs delivering these qualifications were targeted for the survey.

Of the 3948 RTOs regulated by ASQA (at 4 July 2014), 309 had one or more of the specific early childhood education and care qualifications within their scope of registration. As at May 2014 (when the survey was issued) there were 289 RTOs regulated by ASQA with one or more of the specific early childhood education and care qualifications within their scope of registration. All 289 RTOs were notified about the survey and required to complete an online questionnaire within 14 days. Of this number, 289 RTOs submitted a survey response (although may not have responded to all questions), an overall response rate of 100%.

Information on the early childhood education and care courses offered, the location of delivery, the mode of delivery and data on enrolments and completions was provided by RTOs in this survey.

A2.3 Interviews with students, RTO representatives and employers in early childhood education and care training—the voices

Through contact with the 30 RTOs specifically audited for this review, the strategic review team also was able to consult with employers, students, trainers and the RTO management, to gather ideas and concerns on how training and assessment could be improved. This has been of considerable value to the review.

During the audit or post-audit visit, 156 people were interviewed. Of these, 41 were RTO representatives, 62 were early childhood education and care RTOs and 53 were students (past or present).

Table A1: Stakeholder interviews during the sampled audits

Provider type	RTO number	Employers	Trainers	Students
Public	6	14	12	16
Community	5	11	7	9
Enterprise	1	2	2	0
Association	2	2	2	2
Private	16	33	18	26
TOTAL	30	62	41	53

Source: ASQA randomly sampled audit notes 2014

A2.4 Complaints

Complaints made to ASQA about early childhood education and care training were analysed to determine if there were any specific issues and trends related to early childhood education and care training.

A2.5 Audits of RTOs offering early childhood education and care training

The core aspect of this review has been to carry out audits of RTOs providing early childhood education and care training to test the level of compliance with required national Standards for training. The primary purpose of these audits was to determine the compliance or otherwise of RTOs with the *Standards for NVR Registered Training Organisations 2012*.

Essential standards for the continuing registration of an RTO relate to:

- the quality of training and assessment provided by the RTO (SNR 15 [Standards 1.1, 1.3, 1.4, 1.5, 1.6, 1.8, 1.13, 1.14, 1.15, 1.16 and 2.2 of the 2015 Standards])
- adhering to principles of access and equity to maximise trainee outcomes (SNR 16 [Standards 1.5, 1.6, 1.7, 5.1, 5.2, 6.1 and 6.2 of the 2015 Standards])
- RTO management systems that are responsive to client, staff and stakeholder needs (SNR 17 [Standard 2.4 of the 2015 Standards])
- appropriate governance arrangements (SNR 18 [Standard 2.1 of the 2015 Standards]);
- appropriate interactions with ASQA as the national VET regulator (SNR 19 [Standard 8.1 of the 2015 Standards])
- compliance with legislation (SNR 20 [Standards 8.5 and 8.6 of the 2015 Standards]);
- adequate insurance (SNR 21 [Standard 7.4 of the 2015 Standards])
- proper financial management (SNR 22 [Standards 5.3 and 7.2 of the 2015 Standards])
- appropriate arrangements for issuing and recognising VET qualifications and statements of attainment (SNR 23 [Standards 3.1, 3.2, 3.3, 3.4, 3.5, 3.6 and 7.5 of the 2015 Standards])
- the accuracy and integrity of marketing material put out by the RTO (SNR 24 [Standards 4.1 and 4.2 of the 2015 Standards]), and
- the transition of courses to new training package requirements (SNR 25 [Standards 1.26 and 1.27 of the 2015 Standards]).

There are similar standards which applicants for initial registration as a provider need to meet. The Standards are set out in a legislative instrument, *Standards for NVR Registered Training organisations 2011*, in accordance with subsection 185 (1) of the *National Vocational Education and Training Regulator Act 2011*. An extract from the relevant Standards is set out in Appendix D.

RTOs must be compliant at all times with these standards. At the time of the review, to fulfil the requirements for registration as a training provider, RTOs are required to renew their registration every five years. Applications for renewal are risk assessed, and for most, the process will also involve an audit of their compliance against all the standards required for continuing registration. Moreover, all RTOs that have only recently been registered for the first time will have a compliance audit after 12 months of operation. In addition, ASQA can require a compliance monitoring audit of an RTO at any time during the registration cycle, irrespective of whether or not they have submitted an application for registration renewal to ASQA.

ASQA audits RTOs offering child care and early childhood learning training and the results of these audits, particularly data on RTO compliance with the Standards, was used to inform the review's findings. In the report these audits are referred to 'ASQA registration audits'.

This compliance data is taken from audits conducted after 1 January 2013 and finalised before 30 April 2014, where the audit was conducted for one of the following reason:

- provider change application to add scope items
- provider renewal application to renew registration
- monitoring, or
- post initial compliance assessment

Excluded from this review are audits that ASQA has undertaken for initial registration as an RTO where the applicant was seeking to establish a new RTO that would have the relevant Certificate III and/or the diploma on its scope of registration.

In addition, of the 309 RTOs delivering training in child care and early childhood education and care, a random sample of 30 RTOs was audited. In the report these audits are referred to as the 'RTOs specifically audited for this review'.

The focus of the audits was on the following qualifications:

- *CHC30708 Certificate III in Children's Services* (superseded)
- *CHC30712 Certificate III in Children's Services* (superseded)
- *CHC30113 Certificate III in Early Childhood Education and Care*
- *CHC50908 Diploma of Children's Services (Early Childhood Education and Care)* (superseded); and
- *CHC50113 Diploma of Early Childhood Education and Care.*

The units of competency sampled at these audits included for each qualification in are shown in Table A2.

Table A2: Units of competency sampled

Qualification	Units
<ul style="list-style-type: none"> • <i>CHC30708/CHC30712 Certificate III in Children's Services</i> 	<ul style="list-style-type: none"> • <i>CHCPR301B Provide experiences to support children's play & learning</i> • <i>CHCIC301E Interact effectively with children</i>
<ul style="list-style-type: none"> • <i>CHC30113 Certificate III in Early Childhood Education and Care</i> 	<ul style="list-style-type: none"> • <i>CHCECE003 Provide care for children</i> • <i>CHCECE007 Develop positive & respectful relationships with children</i> • <i>CHCECE004 Promote and provide healthy food and drink</i> • <i>CHCECE005 Provide care for babies and toddlers</i>
<ul style="list-style-type: none"> • <i>CHC50908 Diploma of Children's Services (Early Childhood Education and Care)</i> 	<ul style="list-style-type: none"> • <i>CHCPR502E Organise experiences to facilitate & enhance children's development</i> • <i>CHCCN511B Establish & maintain a safe & healthy environment for children</i>

Qualification	Units
<ul style="list-style-type: none"> • <i>CHC50113 Diploma of Early Childhood Education and Care</i> 	<ul style="list-style-type: none"> • <i>CHCECE026 Work in partnership with families to provide appropriate education & care for children</i> • <i>CHCECE002 Ensure the health & safety of children</i> • <i>CHCECE007 Develop positive and respectful relationships with children</i>

Source: training.gov.au

This review focused on a specific subset of the Standards (15 [Standards 1.1, 1.3, 1.4, 1.5, 1.6, 1.8, 1.13, 1.14, 1.15, 1.16 and 2.2 of the 2015 Standards]) that particularly relates to training delivery and assessment, and that was particularly relevant to issues that were raised by the Productivity Commission in its report, namely:

- the strategies for training and assessment, including the student target group; whether the course is delivered in the workplace or classroom or in some other way; the duration of the course; and whether strategies were developed through *effective consultation with industry* (SNR 15.2 [Standards 1.1, 1.4, 1.5 and 1.6 of the 2015 Standards]);
- what staff, facilities, equipment and training and assessment materials the RTO uses to deliver the course (SNR 15.3 [Standards 1.3, 1.5 and 1.6 of the 2015 Standards]);
- the qualifications of trainers and assessors, including their industry experience and vocational competence (SNR 15.4 [Standards 1.13, 1.14, 1.15 and 1.16 of the 2015 Standards]);
- assessment material to be used by the RTO to determine student competence (SNR 15.5 [Standard 1.8 of the 2015 Standards]);
- whether the RTO provided clear information to learners prior to enrolment (SNR 16.3 [Standards 5.1 and 5.2 of the 2015 Standards]);
- how employers were involved in assisting with training and assessment of learners (SNR 16.4 [Standards 1.5 and 1.6 of the 2015 Standards]);
- whether learners receive training, assessment and support service that meet their individual needs (SNR 16.5 [Standard 1.7 of the 2015 Standards]);
- whether the RTO monitors training and/or assessment services provided on its behalf (SNR 17.3 [Standard 2.4 of the 2015 Standards]);
- whether the RTO issues to persons who it has assessed as competent in accordance with various requirements (SNR 23.1 [Standards 3.1, 3.2, 3.3 and 3.4 of the 2015 Standards]);
- whether the RTO ensure its marketing and advertising of and VET qualifications is ethical, accurate and consistent with its scope of registration (SNR 24.1 [Standard 4.1 of the 2015 Standards]); and
- whether the RTO has managed the transition of superseded training packages and qualifications (SNR 25.1 [Standards 1.26 and 1.27 of the 2015 Standards]).

In addition, the review looked at how workplace training and assessment (if any) was organised. Provision of workplace training was a concern for those who made submissions to the Productivity Commission.

The location of the RTOs audited through the registration process and through the RTOs specifically audited for this review audit activity is shown in Table A3.

Table A3: Summary of RTO delivery qualifications and those audited

Jurisdiction	Total number of RTOs approved to deliver these qualifications	Re-registration audits 1 Jan 2013 to 30 April 2014	Audits conducted specifically for this review	Total number of audits	Proportion - all RTOs in jurisdiction (%)
Australian Capital Territory	6	0	1	1	16.7
New South Wales	94	18	9	27	28.7
Northern Territory	4	2	1	3	75.0
Queensland	62	14	8	22	35.5
South Australia	18	2	2	4	22.2
Tasmania	6	0	1	1	16.7
Victoria	65	11	7	17	26.2
Western Australia	8	0	1	1	12.5
Total	263	47	30	76	28.9

Source: RTOs regulated by ASQA

Appendix C: Volume of learning: an explanation

An extract from Australian Qualifications Framework Council www.aqf.edu.au

© Australian Qualifications Framework Council, Issued May 2014

The volume of learning, and the breadth and depth of the knowledge, skills and application of the knowledge and skills determined for a qualification, define the complexity of the qualification.

The volume of learning determined for a qualification must fall within the range provided in the descriptor for the qualification type.

The concept of 'typically' used to describe the volume of learning is intended to provide some flexibility in relation to pathways into and from AQF qualifications that are incorporated into the design of the qualification. It is not intended as justification for not applying the requirement.

Volume of learning applied

It is the responsibility of organisations developing and/or accrediting qualifications to exercise professional judgment to ensure that the design of programs of learning leading to qualifications enables students to achieve the learning outcomes for both the qualification type and the discipline. Decisions about design of qualifications must take into account students' likelihood of successfully achieving qualification outcomes and also must ensure that integrity of qualification outcomes is maintained. Those developing and/or accrediting qualifications should be able to provide a pedagogical rationale to justify a decision about the volume of learning.

The volume of learning allocated to a qualification should include all teaching, learning and assessment activities that are required to be undertaken by the typical student to achieve the learning outcomes. These activities may include some or all of the following: guided learning (such as classes, lectures, tutorials, online study or self-paced study guides), individual study, research, learning activities in the workplace and assessment activities.

The teaching, learning and assessment activities are usually measured in equivalent full-time years. The generally accepted length of a full-time year, used for educational participation, is 1200 hours.

The volume of learning allocated in the design of a qualification may vary depending upon:

- the level of the previous qualification required for entry
- whether the purpose of the qualification is for deepening or broadening of knowledge and skills, or
- whether the qualification leads to professional outcomes or is generalist in purpose.

It would be usual for a greater volume of learning to be allocated to qualifications designed to:

- build on a previous qualification in a different discipline regardless of the level of the previous qualification
- build on a qualification from any lower level, or
- require workplace, clinical or professional practice.

If a lesser volume of learning is allocated to a qualification, the components of the program of learning must be predominately or entirely at the level of the qualification type.

If credit—such as through articulation arrangements—contributes to the volume of learning, the learning outcomes for the qualification must be achievable despite the reduced volume of learning.

Volume of learning applied in delivery

The duration of the delivery of the qualification may vary from the volume of learning specified for the qualification.

Providers may offer the qualification in more or less time than the specified volume of learning, provided that delivery arrangements give students sufficient opportunity to achieve the learning outcomes for the qualification type, level and discipline.

Students may be fast-tracked through the qualification, for example by providers offering three semesters per year, longer study hours in the traditional two semester model, or intensive periods of study. Conversely, some cohorts of students may be offered a longer duration of delivery to support their successful achievement of the qualification outcomes. Students may be offered more self-paced methodologies, including online delivery and workplace delivery, which will vary the duration required to achieve the learning outcomes. The duration may be reduced for individual students if credit towards the qualification is given in the form of recognition of prior learning, advanced standing or credit transfer.

Provider decisions about the duration of the delivery of a qualification must take into account the students' likelihood of successfully achieving the learning outcomes and ensure that the integrity of the qualification outcomes is maintained. If the duration of delivery is substantially different from the volume of learning specified by the qualification type specification, providers should be able to provide pedagogical rationale to support the variation.

Volume of learning for each qualification type

Senior Secondary Certificate of Education	typically two years
Certificate I	typically 0.5-1 year
Certificate II	typically 0.5-1 year
Certificate III	typically 1-2 years. Up to 4 years may be required to achieve the learning outcomes though a program of indentured training/employment.
Certificate IV	typically 0.5-2 years. There may be variations between short duration specialist qualifications that build on knowledge and skills already acquired and longer duration qualifications that are designed as entry level work.
Diploma	typically 1-2 years
Advanced Diploma	typically 1.5-2 years
Associate Degree	typically 2 years
Bachelor Degree	typically 3-4 years
Bachelor Honours Degree	typically 1 year following a Bachelor Degree.
Graduate Certificate	typically 0.5-1 year
Graduate Diploma	typically 1-2 years
Refer to Australian Qualifications Framework qualification type specifications for information about Masters Degree and Doctoral Degree.	

Source: © Australian Qualifications Framework Council, Issued November 2012

Appendix D: Excerpts from the *Standards for NVR Registered Training Organisations 2012*

SNR 15 The NVR registered training organisation provides quality training and assessment across all of its operations, as follows:

- 15.2 Strategies for training and assessment meet the requirements of the relevant training package or VET accredited course and have been developed through effective consultation with industry.
- 15.3 Staff, facilities, equipment and training and assessment materials used by the NVR registered training organisation are consistent with the requirements of the training package or VET accredited course and the NVR registered training organisation's own training and assessment strategies and are developed through effective consultation with industry.
- 15.4 Training and assessment is delivered by trainers and assessors who:
 - (a) have the necessary training and assessment competencies as determined by the National Skills Standards Council or its successors; and
 - (b) have the relevant vocational competencies at least to the level being delivered or assessed; and
 - (c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken; and
 - (d) continue to develop their vocational education and training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.
- 15.5 Assessment including recognition of prior learning (RPL):
 - (a) meets the requirements of the relevant training package or VET accredited course; and
 - (b) is conducted in accordance with the principles of assessment and the rules of evidence; and
 - (c) meets workplace and, where relevant, regulatory requirements; and
 - (d) is systematically validated.

SNR 16 The NVR registered training organisation adheres to principles of access and equity and maximises outcome for its clients, as follows:

- 16.3 Before clients enrol or enter into an agreement, the NVR registered training organisation informs them about the training, assessment and support services to be provided, and about their rights and obligations.
- 16.4 Employers and other parties who contribute to each learner's training and assessment are engaged in the development, delivery and monitoring of training and assessment.
- 16.5 Learners receive training, assessment and support services that meet their individual needs.

SNR 17 Management systems are responsive to the needs of clients, staff and stakeholders, and the environment in which the NVR registered training organisation operates, as follows:

17.3 The NVR registered training organisation monitors training and/or assessment services provided on its behalf to ensure that it complies with all aspects of the VET Quality Framework.

SNR 23 Certification, issuing and recognition of qualifications & statements of attainment

23.1 The NVR registered training organisation must issue to persons whom it has assessed as competent in accordance with the requirements of the training package or VET accredited course, a VET qualification or VET statement of attainment (as appropriate) that:

- (a) meets the *Australian Qualifications Framework (AQF)* requirements;
- (b) identifies the NVR registered training organisation by its national provider number from the National Register and
- (c) includes the NRT logo in accordance with current conditions of use.

SNR 24 Accuracy and integrity of marketing

24.1 The NVR registered training organisation must ensure its marketing and advertising of AQF and VET qualifications to prospective clients is ethical, accurate and consistent with its scope of registration.

SNR 25 Transition to training packages/expiry of VET accredited course

25.1 The NVR registered training organisation must manage the transition from superseded training packages within 12 months of their publication on the National Register so that it delivers only currently endorsed training packages.

Appendix E: Definitions—principles of assessment and rules of evidence

From the *Standards for NVR RTOs 2012*:

Principles of assessment are required to ensure quality outcomes. Assessments should be fair, flexible, valid and reliable as follows:

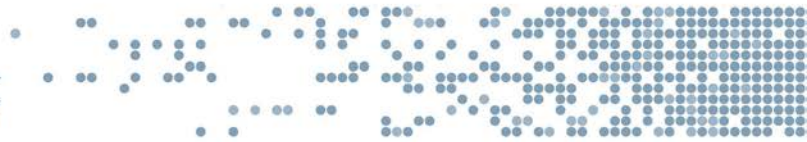
- a) **Fairness:** Fairness requires consideration of the individual candidate's needs and characteristics, and any reasonable adjustments that need to be applied to take account of them. It requires clear communication between the assessor and the candidate to ensure that the candidate is fully informed about, understands, and is able to participate in, the assessment process, and agrees that the process is appropriate. It also includes an opportunity for the person being assessed to challenge the result of the assessment and to be reassessed if necessary.
- b) **Flexible:** To be flexible, assessment should reflect the candidate's needs; provide for recognition of competencies no matter how, where or when they have been acquired; draw on a range of methods appropriate to the context, competency and the candidate; and, support continuous competency development.
- c) **Validity:** There are five major types of validity: face, content, criterion (that is predictive and concurrent), construct and consequential. In general, validity is concerned with the appropriateness of the inferences, use and consequences that result from the assessment. In simple terms, it is concerned with the extent to which an assessment decision about a candidate (for example competent/not yet competent, a grade and/or a mark), based on the evidence of performance by the candidate, is justified. It requires determining conditions that weaken the truthfulness of the decision, exploring alternative explanations for good or poor performance, and feeding them back into the assessment process to reduce errors when making inferences about competence.

Unlike reliability, validity is not simply a property of the assessment tool. As such, an assessment tool designed for a particular purpose and target group may not necessarily lead to valid interpretations of performance and assessment decisions if the tool was used for a different purpose and/or target group.

- d) **Reliability:** There are five types of reliability: internal consistency; parallel forms; split-half; inter-rater; and, intra-rater. In general, reliability is an estimate of how accurate or precise the task is as a measurement instrument. Reliability is concerned with how much error is included in the evidence.

Rules of evidence are closely related to the principles of assessment and provide guidance on the collection of evidence to ensure that it is valid, sufficient, authentic and current as follows:

- a) **Validity:** see Principles of assessment.
- b) **Sufficiency:** Sufficiency relates to the quality and quantity of evidence assessed. It requires collection of enough appropriate evidence to ensure that all aspects of competency have been satisfied and that competency can be demonstrated repeatedly. Supplementary sources of evidence may be necessary. The specific evidence requirements of each unit of competency provide advice on sufficiency.
- c) **Authenticity:** To accept evidence as authentic, an assessor must be assured that the evidence presented for assessment is the candidate's own work.
- d) **Currency:** Currency relates to the age of the evidence presented by candidates to demonstrate that they are still competent. Competency requires demonstration of current performance, so the evidence must be from either the present or the very recent past.



FACT SHEET

Appendix F: Reconsideration of a decision by ASQA (Fact sheet)

The Australian Skills Quality Authority (ASQA), the national VET regulator, makes decisions about the registration of training providers as registered training organisations (RTOs) and the accreditation of VET courses.

If you are dissatisfied with a decision made by ASQA, you have a number of options:

1. Consider the reasons for the decision, address the outstanding areas of non-compliance and submit a fresh application.
2. Ask ASQA to reassess its position
3. Ask ASQA to reconsider the decision.
4. Apply to have the decision reviewed by the Administrative Appeals Tribunal (AAT). Refer to the ASQA fact sheet '[Administrative Appeals Tribunal review of an ASQA decision](#)'.

This fact sheet tells you about **Option 3, the reconsideration process**.

Which decisions can be reconsidered?

Not all decisions can be reconsidered.

Only 'reviewable decisions' as specified in section 199 of the [National Vocational Education and Training Regulator Act 2011](#) (the NVR Act) can be reconsidered. These are listed on Page 2 of this fact sheet.

How do I apply for reconsideration?

You must apply to ASQA for reconsideration using the [Application for reconsideration of reviewable decision](#) form.

You must apply either within 30 days after you are informed of ASQA's decision, or—if you have requested an extension to submit your application and ASQA has granted the extension—within the extended period.

You will receive an email acknowledging receipt of the application.

Is there a fee?

The fee payable for an application for reconsideration is identified in ASQA's [Schedule of fees and charges](#).

Will ASQA place a stay on its decision?

A stay is a decision to suspend the implementation of the decision that you have asked ASQA to reconsider. A stay may be granted subject to conditions.

ASQA will consider whether to place a stay on its decision if:

- your organisation's registration is likely to expire before the completion of the reconsideration process, or
- you request ASQA to do so.



Reviewable decisions under s 199 of the NVR Act

A decision to grant an application for registration (including renewal of registration) as an NVR registered training organisation.

A decision determining the period for which a national VET regulator (NVR) registered training organisation is registered.

A decision to impose a condition on an NVR registered training organisation's registration.

A decision to reject an application for registration (including renewal of registration) as an NVR registered training organisation.

A decision to vary a condition on an NVR registered training organisation's registration.

A decision not to determine a shorter period for making an application for renewal of registration as an NVR registered training organisation.

A decision to change, or refuse to change, an NVR registered training organisation's scope of registration.

A decision to suspend all or part of an NVR registered training organisation's scope of registration.

A decision to shorten the period of an NVR registered training organisation's registration.

A decision to defer making a decision to change an NVR registered training organisation's scope of registration until the organisation addresses issues identified by the National VET Regulator.

A decision not to allow an NVR registered training organisation's registration to be withdrawn.

A decision to cancel an NVR registered training organisation's registration.

A decision to grant an application for accreditation of a course (including renewal of accreditation) as a VET accredited course.

A decision to impose conditions on the accreditation of a VET accredited course.

A decision to vary a condition on the accreditation of a VET accredited course.

A decision to reject an application for accreditation of a course (including renewal of accreditation) as a VET accredited course.

A decision to amend a VET accredited course.

A decision to cancel the accreditation of a VET accredited course.

A decision to give a written direction to an NVR registered training organisation under paragraph 36(2)(a) or (b).

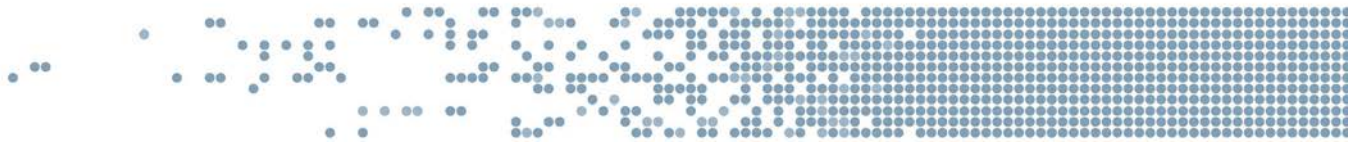
A decision to issue, or not issue, a VET qualification.

A decision to issue, or not issue, a VET statement of attainment.

A decision to cancel, or not cancel, a VET qualification.

A decision to cancel, or not cancel, a VET statement of attainment.

A decision to enter details on the register under subsection 216(4).



What is the process for reconsidering a decision?

In most cases, an ASQA Commissioner or ASQA staff member, who was not involved in making the original decision, will reconsider the decision.

If an ASQA staff member made the original decision, only a Commissioner or more senior member of staff may reconsider the decision.

The person reconsidering the decision has the authority to affirm, vary or revoke the decision.

As part of the reconsideration process, ASQA will consider the reconsideration application, any additional information provided with the application and the evidence on which the original decision was made.

How long does it take for a decision to be reconsidered?

It may take up to 90 days from the day a complete 'Application for reconsideration of reviewable decision' is received for ASQA to make a decision about the application.

You will be advised in writing of ASQA's decision, and receive a statement of reasons for the decision, within 30 days of the decision being made.

Further rights of review

The [Administrative Appeals Tribunal](#) (AAT) provides independent review of a wide range of administrative decisions made by the Australian Government (and some non-government bodies).

The AAT aims to provide fair, impartial, high-quality and prompt review with as little formality and technicality as possible. Both individuals and government agencies use the services of the AAT.

The AAT has the power to set aside decisions made by ASQA, including decisions made as part of the reconsideration process. An application can also be made to the AAT for a stay of ASQA's decision.

An appeal to the AAT must usually be made within 28 days of receiving ASQA's decision.

If you submit an 'Application for reconsideration of reviewable decision' to ASQA and apply to an external review body such as the AAT before ASQA has made its reconsideration decision, ASQA will stop the reconsideration process and affirm its original decision.

Additional information

Freedom of information

You have the right to obtain access to documents about the decision under the Freedom of Information Act 1982. Information about how to make an application to ASQA to access documents is available from the ['About' section of ASQA's website](#).