

REPORT

A review of issues relating to unduly short training



Australian Government

Australian Skills Quality Authority



Letter of transmittal

The Hon Karen Andrews MP
Assistant Minister for Vocational Education and Skills
Parliament House
CANBERRA ACT 2600

Dear Minister

I am pleased to provide the report on the Australian Skills Quality Authority's (ASQA's) national strategic review of issues relating to unduly short training.

ASQA initiated this strategic review in response to concerns raised, through both its regulatory findings and previous strategic reviews, that unduly short training is preventing learners from gaining the skills and competencies required to be certified as competent from VET courses.

This national strategic review involved examining the websites of RTOs to determine the length of courses being advertised. The review has found that more than a quarter of VET training package qualifications are being advertised with course durations below the period recommended by the Australian Qualifications Framework.

ASQA is concerned that this is an indicator of 'unduly short training'—courses that do not deliver sufficient training to support learners to gain the required competencies. ASQA's regulatory work to date has found the impact of unduly short training to be widespread, posing fundamental challenges to ensuring high-quality training across the country.

The review was guided by a reference committee of key stakeholders drawn from industry, providers, regulators and government and chaired by ASQA's former Chief Commissioner, Chris Robinson. ASQA is grateful for the invaluable contribution of the reference committee—both collectively and individually—and also for the active support and contributions from other stakeholders.

Key recommendations of this review address the findings that:

- Regulation of duration in VET is complex and confusing, including different duration requirements for the two different types of nationally recognised training products.
- There is significant risk that in many cases the duration of training is not sufficient to enable learners to gain the competencies specified in the training, leading to loss of confidence in vocational education and training and long-term costs to industry, individuals, the community and governments.

- There is insufficient consistently presented and comparable information available to enable VET consumers to allow them to make informed choices between RTOs.
- Sensible and proportionate change to the VET regulatory framework will enable effective regulation of course duration, provide industry with a lead role in addressing the risks of poor-training by specifying their requirements, and empower industry and prospective learners with the information to more readily compare training providers and their offerings.

The implementation of this strategic review's recommendations will considerably strengthen the quality of training and assessment provided to learners. This is particularly important; not only for the integrity of the VET sector but also for other key industries, especially those related to public health and safety, that rely on the integrity of AQF qualifications to guarantee a skilled workforce.

I commend this report and its recommendations to you.

Yours sincerely,



Mark Paterson, AO
Chief Commissioner and
Chief Executive Officer

28 June 2017

Key findings

- Research, stakeholder reports and a number of ASQA's previous strategic industry reviews show that concern about unduly short training is widespread and longstanding.
- Regulation of duration in VET is complex and confusing, and includes different requirements for duration for the two different types of nationally recognised training products.
- Other countries provide greater specification of duration, demonstrating that in competency-based training systems there are still circumstances in which mandating duration is considered a necessary means of regulating quality.
- There is significant risk that in many cases learners are not gaining the competencies specified in VET qualifications, leading to loss of confidence in vocational education and training as well as long-term costs to industry, individuals, the community and governments.
- More than a quarter of the 11,677 advertisements reviewed on ASQA-regulated RTOs' websites that advertised duration for training package qualifications have a course duration below the minimum of the Australian Quality Framework (AQF) volume of learning range.
- Many providers offer good-quality training; however, these providers are facing increased pressure to either reduce quality or leave the market—because they cannot compete with providers offering unduly short and inadequate training programs.
- The long-term sustainability of the VET system is at risk unless the issue of unduly short training is definitively addressed.
- There is insufficient consistently presented and comparable information available to enable VET consumers to make informed choices between RTOs.
- Sensible and proportionate change to the VET regulatory framework will enable effective regulation of the amount of duration, provide industry with a lead role in addressing the risks of poor-quality training (by specifying their requirements), and empower industry and prospective learners with the information to more readily compare training providers and their offerings.

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Executive summary

About this review

Since its establishment in 2011, ASQA has become increasingly concerned by the incidence of unduly short training in Australian vocational education and training (VET). 'Unduly short training' refers to situations in which a registered training organisation (RTO) delivers an insufficient amount of training for a learner to acquire the requisite skills and knowledge specified in a unit of competency, skill set or qualification.

In previous strategic reviews, ASQA has found a significant number of training courses are delivered in timeframes below those required by the Australian Qualifications Framework (AQF).

In addition, ASQA's regulatory data shows that many RTOs are struggling to comply with the requirement in the national training standards—the *Standards for Registered Training Organisations 2015* (Standards for RTOs)—to provide a sufficient amount of training to ensure that learners have achieved competency. While time is not the only proxy for acquiring skills in a system based on competency training, it can be a strong indicator of a high risk that the competencies have not been achieved.

The impact of unduly short training is far-reaching, with significant consequences for learners, employers, RTOs, the community and governments, including financial, employability, and productivity impacts and individual, workplace and public safety risks.

It is these concerns that have led ASQA to identify 'short course duration' as a systemic risk across the VET sector. To better understand this situation, ASQA conducted this strategic review.

The review has involved:

- considering Australia's current VET regulatory framework and analysing various Australian reports and research, including ASQA's previous strategic reviews and reports by other regulators
- analysing information about RTOs' compliance with amount of training requirements in the Standards for RTOs for the period from 1 April 2015 to 31 March 2017
- analysing complaints made to ASQA about amount of training for the period from 1 April 2015 to 31 March 2017
- commissioning research into the regulatory approaches to course duration or amount of training adopted in other countries, and
- examining the websites of ASQA-regulated RTOs in the period between March 2015 and October 2015 to identify and analyse advertising about course duration.

The review was informed by a reference committee comprising key industry and government stakeholders. While the views of these stakeholders were an important consideration, the recommendations made in this report are made by ASQA.

What the review found

Regulation of duration in VET is complex and confusing

Competency-based training is at the core of the Australian VET system—as it is in many systems around the world. The central tenet of competency-based training is that a learner’s rate of progress is determined by their demonstrated competency, rather than by how long they have spent training.

The flexibility inherent in the AQF volume of learning requirements and the Standards for RTOs enshrines the concept of competency-based training and allows RTOs the flexibility to deliver the ‘amount of training’ that caters specifically to learners’ individual needs.

However, this flexibility may be confusing for some RTOs and is complex to regulate effectively. The system is open to inconsistent interpretations about the amount of training required due to:

- the AQF volume of learning range applying at qualification and not unit level, and including both supervised and unsupervised learning activity in its definition, without the requirement for these components to be separately specified
- the absence of a benchmark in training packages for the duration of training delivery in either units or qualifications, and
- reliance on RTOs exercising high-level professional judgement about the required amount of training.

At worst, this flexibility can open the door for RTOs to assert that the apparent short duration of their courses is due to the way they have allocated volume of learning across RTO supervised and learner directed learning activities. That is, they can assert that while the supervised activities may be of short duration, the bulk of the course is ‘self-directed’ and therefore the totality of the course duration is in line with the AQF requirements.

The review has highlighted an anomaly in how ‘amount of training’ is regulated for the two types of nationally recognised training products: training packages; and VET accredited courses. While training packages are generally silent on duration, accredited courses must include nominal hours for supervised training. This inconsistency in the structural and regulatory requirements has no clear rationale.

More than three quarters of VET enrolments are in training package qualifications. The current regulatory framework for training packages does not allow training package developers to set clear requirements for the amount of training that a new learner might expect to be required to undertake. While the amount of training will be different for different learners, a benchmark should be set for new learners where there is a demonstrated risk of unduly short training.

The review also found that course duration is determined and used by other agencies for a variety of purposes outside of the regulatory framework set for ASQA. In some cases these requirements are driven by lack of confidence in the quality of VET outcomes.

The impacts of these multiple arrangements—in terms of regulatory burden on RTOs and transparency for consumers—are significant.

Other countries provide greater specification of duration

ASQA's review of international examples demonstrates that Australia's approach differs significantly from other major VET systems, most of which allocate unique notional learning times to each individual qualification. Some assign both credit points and actual hours to individual qualifications. Some are adopting consistent and more specific approaches to setting supervised and unsupervised hours for each qualification.

Both local and international examples show that in a competency-based system there are still circumstances in which mandating duration is considered a necessary means of regulating quality.

RTOs are advertising large numbers of very short duration courses

ASQA's review collected information on 11,677 advertisements that showed course duration. The advertisements reviewed included 1098 training package qualifications across qualification levels (certificate 1 to advanced diploma) and qualification types. These courses were advertised by 1181 ASQA-regulated RTOs on their websites between March and October 2015.

The data collected was analysed to identify:

- whether course durations being advertised are within or below the volume of learning range set by the AQF for each qualification level and if below, by how much, and
- whether short duration courses are prevalent in particular industry sectors, specific qualifications or qualification levels.

The review also considered 2015 National Centre for Vocational Education Research (NCVER) enrolment data for ASQA-regulated RTOs, in order to show the level of training activity associated with particular qualifications. If qualifications with large enrolment numbers have high rates of short duration courses, the potential impact of poor-quality training outcomes is heightened.

The review found that more than a quarter of courses were advertising duration **of less than the minimum of the AQF volume of learning range**. Almost eight per cent of the courses reviewed were advertised with duration of **less than half the of the minimum AQF volume of learning range**.

Within each AQF level, this review has both:

- identified those qualifications with the highest rates of advertised short duration, and
- highlighted those qualifications for which unduly short training could have the greatest impact.

The impact is likely to be greater for those qualifications:

- with the highest enrolment numbers (which indicates market demand as well as the extent of risk if graduates are not adequately trained)
- needed to skill workers in growth industries
- offered to disadvantaged learners, and/or
- required for job roles with vulnerable clients or with implications for community or workplace health and safety.

This review also highlights the special case of the Certificate IV in Training and Assessment (TAE40110) based on its central role as the key qualification for teachers and trainers in the VET system.

The review has found the TAE40110 to be the Certificate IV qualification with the highest proportion of advertised course durations below 50 per cent of the AQF volume of learning minimum. This presents a significant risk to the entire VET system—as poor-quality delivery of the TAE has a compounding effect on the quality of delivery and assessment for all vocational training in Australia.

This review does not contend that all of the courses with an advertised duration below the minimum of the AQF volume of learning range are unduly short or of poor quality. RTOs may have valid reasons for advertising and delivering courses with duration below the AQF volume of learning range. However, in the context of ASQA's regulatory experience to date, there is a risk that a significant number of these advertisements will be the result of RTOs offering unduly short training—that is, training that is not enabling students to achieve competency in the skills required by the qualification.

Informed consumer choice in VET is challenging

Despite Australia's VET market including more than 4600 training providers, competition is currently not driving quality upwards, because consumers do not have sufficient information to make informed choices.

The review has found significant inconsistency in how RTOs advertise course duration, including different terminology, meanings of duration, and measures of time. This is likely to be confusing for industry and learners trying to choose the most appropriate course. In particular, this lack of consistency makes any direct comparison between courses challenging, as there can be significant variation in the advertised course duration of the same qualifications offered by different RTOs.

However, ASQA's review of international systems reveals there are opportunities to consider approaches being taken to improve the consistency, accessibility and transparency of VET consumer information in other countries.

Other quality concerns

ASQA recognises that in addition to course duration there are other issues affecting the quality of training outcomes. Often these quality concerns are interrelated and there is a need for complementary measures to address their impact in a holistic manner. For example, ASQA's regulatory work has found that the

quality of assessment continues to pose a significant challenge for RTOs and there are high rates of non-compliance with the relevant Standard.

In September 2015, Senator the Hon. Simon Birmingham, the-then Assistant Minister for Education and Training, established the Training and Assessment Working Group to develop reform options to improve the quality of assessment in VET in consultation with stakeholders. The working group consisted of representatives from industry and the VET sector. ASQA was represented on this working group and contributed to the development of these recommendations. The recommendations of the Training and Assessment Working Group are available at: www.education.gov.au/improving-quality-assessment-vet.

As a result of this work, the relevant training package was revised and the new TAE qualifications enhanced. ASQA initiated a strategic risk project to ensure that RTOs seeking to transition to the new TAE qualification are quality providers. This is discussed further in Chapter 4.

The recommendations in this strategic review are designed to contribute to the work to improve the quality of assessment in VET, as well as to broader reform initiatives, including:

- the review of the Australian Qualifications Framework
- the review of the *National Vocational Education and Training Regulator Act 2011* and its subordinate legislation, and
- ongoing enhancements to the My Skills website to improve the quality and accessibility of information available for VET consumers.

The way forward

ASQA is of the view that the quality of VET outcomes would be improved by a sensible and proportionate change to the VET architecture that:

- sets a consistent definition of 'amount of training' across all nationally recognised qualifications
- ensures industry risks are proactively addressed, and
- allows industry, where warranted, to set specific training and assessment delivery requirements, including course duration requirements, in the relevant training packages.

While the review has focused on the risk posed by unduly short training, the recommendations in this review have been developed to enable training package developers to respond to the broader risks to quality associated with the training covered by their industry-specific training packages.

Supplementing this initiative by providing improved consumer information would also improve the quality of VET outcomes by enhancing the transparency of the VET system and enabling industry and learners to make informed choices based on accurate and consistently presented information.

Over time if duration is able to be effectively regulated in certain industry sectors and there is a corresponding lift in the quality of outcomes, occupational licensing regulators may have the confidence to

remove the additional regulatory requirements they currently impose, reducing regulatory burden and the current inconsistencies in requirements that exist across jurisdictions.

Proposed strategy and recommendations

ASQA recommends a single, coherent strategy (comprising three related recommendations) to address the unacceptable risk that unduly short training poses to individual learners, employers, industry, the community and the quality of the VET system. The recommended strategy supports the COAG Industry and Skills Council objectives established in 2014 to guide the reform of Australia's VET system and complements other reform initiatives underway.

Although focused on the issue of unduly short training, ASQA contends that the strategy proposed will provide the vehicle to address a range of VET quality concerns and as a result drive significant, long lasting improvements for all stakeholders of the system.

The strategy recommends:

1. Strengthening the *Standards for Registered Training Organisations 2015* by defining the term 'amount of training' to include the supervised learning and assessment activities required for both training packages and VET accredited courses.
2. Ensuring effective regulation of training by enabling Industry Reference Committees (IRCs) to respond to identified risk by including appropriate training delivery requirements, including the amount of training:
 - a) in the endorsed component of training packages (as mandatory) where they judge this is warranted, and/or
 - b) in the companion volume of the training packages (as recommended) where this is judged as a more proportionate response to the risk
3. Enhancing transparency by requiring public disclosure of the amount of training in product disclosure statements, presented in a consistent way to enable comparisons across courses.

Recommendation 1

That the *Standards for Registered Training Organisations 2015* be amended to include a definition of the 'amount of training' that focuses on supervised learning and assessment activities

Under Standard 1 of the *Standards for Registered Training Organisations 2015*, RTOs must establish an 'amount of training' for each qualification they deliver. To do so, they are required to take into account the existing skills, knowledge and experience of the learner; the mode of delivery; and the requirements of the training package or VET accredited course.

The Standards for RTOs do not, however, contain an explicit definition of what is actually meant by or included in the amount of training. This gives rise to misunderstandings and differing interpretations across and within RTOs. In the absence of an explicit definition of amount of training, it has been taken to be analogous to the AQF volume of learning.

The AQF defines the volume of learning as including all teaching and learning activities and assessment activities that a typical student is required to undertake to achieve the learning outcome. The AQF volume of learning does not differentiate between the component parts which make up the total volume of learning.

This is causing uncertainty for RTOs, learners and the regulator about both:

- the total required amount of training, and
- what proportion of training should be undertaken as supervised training activities.

The omission of a definition of amount of training continues to be a weakness of the current legislative framework, given the pivotal role that the amount of training plays in assuring the quality of learning outcomes.

The inclusion of a definition of amount of training that specifies the supervised learning and assessment activities that are included would strengthen the current legislative framework. The amount of training, so defined, would form a component of volume of learning and enable greater guidance to be given to RTOs about the amount of supervised learning and assessment activities that should be delivered.

It is recommended that the amount of training include all formal teaching, learning and assessment activities that a new learner would need to undertake to achieve the learning outcomes specified, expressed in hours. It is recognised that the definition requires further consideration to ensure it is workable and does not lead to unintended consequences.

As a starting point for this consultation, it is proposed that amount of training could include:

- supervised or guided learning, such as:
 - > tuition and other trainer-directed workshops or activities
 - > structured self-paced study

- > structured work placement
- > projects and prescribed set tasks, and
- Assessment activities.

It would not include unsupervised learning, such as:

- private study or preparation, including prescribed reading, or
- self-initiated learning or research.

It is not intended that each of these activities must be included in the delivery of training.

This proposed definition draws upon good practice identified in the regulatory models of other countries with competency-based training systems. The proposal aims to provide clarity for RTOs, learners, industry and the regulator about the time a learner (who is new to the industry area) would be required to undertake in supervised learning and assessment activities.


As is currently the case, learners may be required to undertake further unsupervised learning activities in addition to the supervised learning and assessment activities to ensure their total training activities are in line with the AQF volume of learning requirements. ASQA notes that the Australian Government has announced a review of the AQF Framework and it is recommended that this review give consideration to the matters raised in this report.

It is recommended that the definition of amount of training included in the *Standards for Registered Training Organisations 2015* be replicated in the *Standards for VET Accredited Courses 2012* and the *Standards for Training Packages 2012* (and the associated policies and procedures) to ensure a consistent definition is adopted across the three sets of standards.

ASQA recommends that the views of industry, government and RTOs are considered in finalising the 'amount of training' definition. This will ensure that any definition takes account of the practical issues associated with the delivery of supervised training and assessment activities across a range of modes of delivery.

It is recommended that:

- 1.1. A comprehensive definition of the term 'amount of training' be included in the *Standards for Registered Training Organisations 2015*, specifying the supervised learning and assessment activities that are included.
- 1.2. The definition of 'amount of training' be agreed through a consultative process commissioned by the Department of Education and Training, led by the Chair of the Australian Industry Skills Committee, and involving key stakeholders including industry, RTO and government representatives.
- 1.3. Once finalised, the term 'amount of training' be adopted in the *Standards for VET Accredited Courses 2012* and associated VET Accredited Course requirements and documentation, the



Standards for Training Packages 2012 and the associated Training Package Development and Endorsement Process Policy.

- 1.4. The current review of the Australian Qualifications Framework give consideration to the issues raised in this report in relation to the application of the AQF to the VET sector.

Recommendation 2

That training package developers be able to respond to industry-specific risks by setting mandatory requirements, including an amount of training.

The review has found that depending on the drivers at play, certain industries and qualifications are more vulnerable to the risk of unduly short training than others. It is also acknowledged that there are other risks to quality training, often interrelated with course duration.

This review has documented the training package qualifications most at risk of unduly short training. It has also documented that there are training package qualifications which appear to be less at risk. There are risks that relate to, for example, the quality of assessment and the mode of delivery. As a result, the response to these risks should not be a 'one size fits all' solution. Rather, industry should be supported to develop a proportionate response to the risk in particular industries.

The current VET regulatory architecture does not allow for industry to systematically identify and respond to risks by strengthening the requirements governing the delivery of training and assessment. ASQA recognises that the response to unduly short training must be driven by industry and must be proportionate to the risk.

A more comprehensive and structured approach to the timely identification of emerging risks across the VET sector and for specific industries is needed to inform the developers of training products.


It is recommended that where widespread poor quality-training poses an unacceptable risk—including a risk to the learner, the workplace, the community or the environment—or where there are already systemic issues with the quality of training, IRCs must respond to this risk.

The IRC response would involve specifying training delivery and assessment requirements, including the amount of training appropriate for a new learner.

This process would involve the IRCs:

- assessing the risk to determine the significance of its impact, and
- recommending a strategy to effectively mitigate the risk which may include:
 - > specifying mandatory training delivery or assessment requirements (including the amount of training where this is warranted), and/or
 - > providing enhanced guidance to RTOs through the inclusion of recommended training delivery or assessment requirements, including the amount of training.

Such requirements could be set at the unit of competency level and could sit in either the endorsed components of training packages (so that they are mandatory for RTOs and auditable by the regulator) or in the companion volume (where they would be advisory only).



It is recommended that the Australian Industry and Skills Committee (AISC), in consultation with industry, governments, IRCs, Skills Service Organisations (SSOs), VET regulators, and the National Centre for Vocational Education Research (NCVER), establish a formal risk-identification process that would be used by the IRCs when developing or revising training products.

A formal risk-identification process would ensure that IRCs have access to the most current data and information, allowing them to fully assess the risk to their training package products. As part of this process, ASQA would publish an annual statement of risks based on its intelligence, compliance data and complaints data. This statement would include both risks at the whole of sector level as well as any qualifications of concern.

RTOs would be required to implement the training delivery and assessment requirements specified in the endorsed components of training packages, including the amount of training for a new learner, unless they present a rationale that justifies their delivery arrangements (for example, that their learner cohort had previous industry experience).

This recommended industry-driven and risk-based approach is appropriate, given that the VET system is a competency-based system, and not a system based on training time. A competency-based system is intended to deliver that which is needed to ensure the student acquires the skills and is assessed as competent. Each learner or group of learners can bring to the training either pre-existing skills and experience, or a set of challenges that requires more intensity.

An IRC's decision to set these mandatory requirements would need to be evidence-based and presented as part of the Case for Endorsement to the AISC. The AISC would ensure the proposed training delivery requirements are targeted, proportionate and without unintended consequences as part of the endorsement process.

Where an IRC does not recommend either a mandatory or recommended amount of training to the AISC for product endorsement, RTOs and VET regulators would continue to exercise their own professional judgement about what a sufficient amount of training is, in line with the training package or VET accredited course requirements.

Through its strategic reviews into specific industry areas and in this review, ASQA has provided an assessment of the risks that confront certain industries and it is recommended these be treated as a priority for IRC consideration.

It is recommended that:

- 2.1 The Australian Industry and Skills Committee, in consultation with industry, IRCs, SSOs, VET regulators, NCVET and government training agencies, develop a formal process to identify and address risks to the quality of training and assessment, which is to be applied consistently by IRCs when developing or revising training products.
- 2.2 Where there is evidence that the consequences of poor-quality training delivery pose an unacceptable risk to the learner, workplace, community or environment, IRCs be required to develop a risk-mitigation strategy which may include specifying training delivery and assessment requirements, including the amount of training appropriate for a new learner. These requirements may be specified in the endorsed components of training packages (as a mandatory requirement); and/or the companion volume (as guidance).
- 2.3 As part of its role in approving training packages for implementation, the Australian Industry and Skills Committee confirm the appropriateness of any training delivery and assessment requirements specified by an IRC and their capacity to mitigate the identified risk(s).
- 2.4 RTOs be required to implement the 'training delivery and assessment requirements' where they are specified in the endorsed components of training packages, unless the RTO can present a rationale that justifies their delivery arrangements (for example, that their learner cohort had previous industry experience).
- 2.5 Given the considerable risks already documented by ASQA in this and previous reviews, the IRCs responsible for the following training packages and skill sets be asked to respond to these risks. This should include giving consideration to specifying a mandatory amount of training appropriate for a new learner as a matter of priority for the following sectors:
 - > aged and community care
 - > early childhood education and care
 - > security operations
 - > equine programs
 - > construction safety induction ('White Card')
 - > training and education.

Recommendation 3

That RTOs be required to publish Product Disclosure Statements that include the range of learning activities expected, including the amount of training, for each training product on their scope of registration.

This recommendation addresses the lack of transparency and consistency in the way training products are advertised and described to potential learners through the introduction of a Product Disclosure Statement for every training product on an RTO's scope.

This review has found that RTOs' current advertising practices vary significantly and, as a result, are confusing for VET consumers.

Clause 5.1 of the *Standards for Registered Training Organisations 2015* requires that:

' ... prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides advice to the prospective learner about the training product appropriate to meeting the learner's needs, taking into account the individual's existing skills and competencies.'

Clause 5.2 provides details of the required content which includes reference to the 'estimated duration' and requires that the advice 'be in print or through referral to an electronic copy'.

ASQA proposes that these current requirements form the basis of the Product Disclosure Statement, which would prescribe the format for how this advice is to be communicated to potential learners.

It is recommended that a template be developed for the Product Disclosure Statement that standardises how the requirements of Clause 5.2, including estimated duration, are expressed.

The template would include requirements for estimated duration; RTOs would be required to specify:

- the amount of training to be provided in **hours** (as defined in Recommendation One), and
- the other activities that learners are expected to complete to make up the AQF volume of learning requirements.

In effect, this simply requires an RTO to formally document what, under the Standards for RTOs, an RTO already needs to establish when developing a training and assessment strategy.

Importantly, a standard Product Disclosure Statement would provide learners with easy-to-understand information about the total time commitment required to complete a qualification, including the amount of supervised learning activity that will be delivered by an RTO.

In its capacity as the national directory of VET organisations and courses, the My Skills website would also be significantly strengthened through the mandatory inclusion of each RTO's Product Disclosure Statements for all training products on their scopes of registration. Importantly, this would deliver on My Skills' stated goal of enabling 'consumers to search for, and compare, VET courses and training providers'.

It is recommended that:

- 3.1 The Department of Education and Training, in consultation with industry stakeholders, develop a template for a Product Disclosure Statement in a standard, easy-to-understand format. This template would require RTOs to specify the key features of their training and assessment strategy, including specifying in hours the estimated duration for the
 - > amount of training, and
 - > other non-supervised learning activities that contribute to the course outcomes.
- 3.2 The *Standards for Registered Training Organisations 2015* be amended to require every RTO to publish a corresponding 'Product Disclosure Statement' that conforms to an agreed template for each training product on its scope of registration.
- 3.3 Every RTO be required to provide each prospective and current learner with the relevant Product Disclosure Statement.
- 3.4 All Product Disclosure Statements be made freely available through each RTO's website and the information included in or linked to any marketing of qualifications.
- 3.5 Every RTO be required to make their Product Disclosure Statement(s) available through the Australian Government's My Skills website so that employers and prospective learners can:
 - > easily understand what is needed to achieve the training outcome;
 - > be clear about the RTO effort that will go into the learning and assessment a learner will receive (in return for the cost of the training program); and
 - > be able to more readily compare the offerings of RTOs.

A summary of proposed changes to existing standards and policy is included at page 119.

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 was established through the *National Vocational Education and Training Regulator Act 2011* (NVR Act).

ASQA regulates courses and registered training organisations (RTOs) to ensure nationally approved quality standards are met, so that learners, employers and governments can 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:

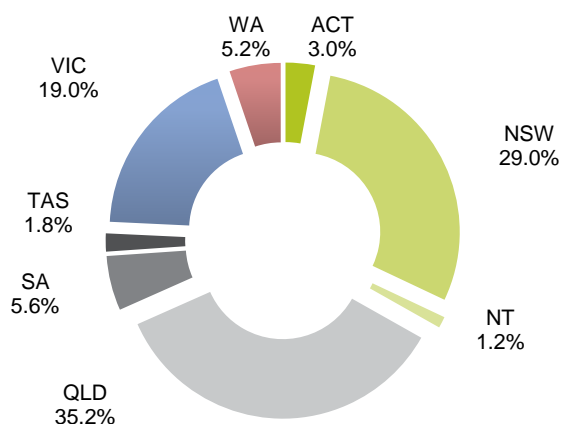
- Australian Capital Territory
- New South Wales
- Northern Territory
- South Australia
- Queensland, and
- Tasmania.

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.

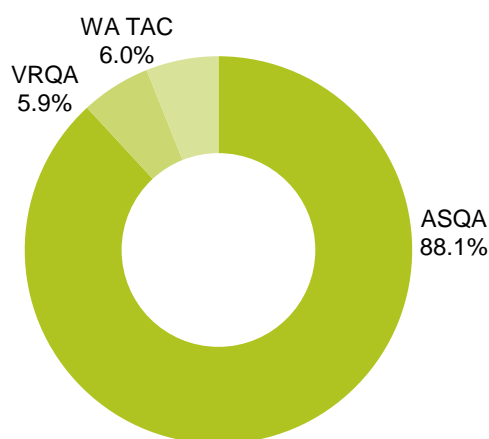
Figure 1 shows the distribution of ASQA-regulated RTOs by the state and territory of their registration.

Figure 1: ASQA-regulated registered training organisations by state/territory as at 30 June 2016



As at 30 June 2016, ASQA was responsible for the regulation of 4082 of the 4632 RTOs nationally. This represents 88.1 per cent of the total national provider market. The Victorian Registration and Qualifications Authority (VRQA) and Western Australian Training Accreditation Council (WA TAC) regulate 5.9 per cent and 6.0 per cent of the national training provider market respectively (Figure 2).

Figure 2: Regulators' market share of registered training organisations as at 30 June 2016



In addition to regulating VET providers, ASQA also regulates accredited VET courses and is a designated authority under the *Education Services for Overseas Students Act 2000* (ESOS Act). Under the ESOS Act, ASQA regulates the courses and providers listed on the Commonwealth Register of Institutions and Courses for Overseas Students, including those delivering English Language Intensive Courses to Overseas Students. This paper focuses on ASQA's role as the national VET regulator and does not include any further detail on its role as the regulator under the ESOS Act.


1.2. ASQA strategic reviews

As the national regulator, ASQA is committed to maintaining world-class vocational education and training standards across Australia. ASQA is responsible for managing risks to the quality of VET outcomes for learners, employers and the community. As a contemporary regulator, ASQA applies a risk-based regulatory approach, focusing on both provider and systemic risks.

Section 157(1) (e) of the *National Vocational Education and Training Regulator Act 2011* states that the National VET regulator has the following function:

'... if requested to do so by the Minister, or on the Regulator's own initiative, to advise and make recommendations to the Minister on matters relating to vocational education and training.'

ASQA's strategic reviews conduct in-depth analysis of particular issues, sectors, qualifications or methods 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.



To date, ASQA has released reports on seven strategic reviews targeting training 'hot spots'—that is, areas where intelligence has identified risks to the quality of outcomes achieved by training delivery and assessment:

- *Training for aged and community care in Australia* (released December 2013)
- *Training for the White Card for Australia's Construction Industry* (released December 2013)
- *Marketing and advertising practices of Australia's registered training organisations* (released December 2013)
- *Training for early childhood education and care in Australia* (released August 2015)
- *Targeted audit of VET FEE-HELP providers 2015* (released October 2015)
- *Training in equine programs in Australia* (released December 2015)
- *Training in security programs in Australia* (released January 2016).

Copies of these reports may be accessed at <https://www.asqa.gov.au/news-publications/publications/strategic-review> .

1.3. Drivers of this strategic review

1.3.1. Findings of ASQA's previous strategic reviews

A note about terminology

In previous strategic review reports and this current report, ASQA has referred to the length of training programs as 'course duration'. Course duration does not have a technical meaning and is used to describe the time taken to undertake a course from its commencement to completion.

ASQA also uses the term 'unduly short training' to distinguish those courses that are being delivered in significantly shorter timeframes or durations than reasonably required to ensure learners gain the competencies specified in the training.

Chapter 2 outlines the various technical terms used in the VET sector to define measures of course duration or components of course duration.

The findings of successive strategic reviews which have included evidence of unduly short training occurring or being advertised have been a key driver of this review.

ASQA's 2013 strategic review, *Marketing and advertising practices of Australia's registered training organisations*, found that, of the 421 RTO websites reviewed, 227 (53.9%) market what many consumers and stakeholders referred to as unrealistically short duration programs.

Other previous strategic reviews into the quality of training provided in key industry sectors—including aged and community care; construction; early childhood education and care; security; and equine—documented the extent and the impact of unduly short training in these industry sectors.


The reviews found a number of sector-wide factors driving the demand for short courses, including legitimate expectations for cost-effective and timely training. However, the impacts of such demand on market behaviour, public and worker safety, and confidence in the VET system can be considerable.

In many cases, learners and employers are looking for training that is conducted as quickly and efficiently as

possible. Where high-volume national qualifications are delivered by multiple RTOs, this learner/employer demand has seen some RTOs choose the amount of training as their point of difference in what is often a highly competitive market.

While discerning or well-informed clients may be sceptical when programs promote extremely short periods of training, a reduced time commitment can be a major attraction for some potential clients. These include people already in work, or people for whom the actual testamur—as distinct from the skills and knowledge—is the primary goal. Understandably, employers can also prefer shorter training to ensure that productivity is disrupted as little as possible.

Few RTOs may consciously set out to do the wrong thing, but the impact of those that do unduly shorten course duration is significant, as market pressure may then lead others to compromise their standards to varying degrees. Rather than concede quality and reputation, some RTOs may simply opt to leave the training market or cease the delivery of the relevant qualification. This possibility was raised by a number of RTOs ASQA surveyed during previous strategic reviews.



Where VET qualifications are required for employees to gain or maintain their employment (due to industry specific legislative or occupational licensing requirements) there can be strong consumer demand for courses of short duration.

In some industries and for some occupations, nationally recognised qualifications, skill sets or units of competency are used as the basis for ensuring safe practice and to mitigate risks to the individual, the workplace, the community at large or the environment. The potential for unduly short training has proven to be high where mandatory qualifications are required (for example, to gain or maintain employment).

In the case of training for the 'White Card'¹ for Australia's construction industry, ASQA's strategic review found that the potential impact of very short duration training is extremely serious. Workers' lives may be at risk on construction sites as a result of the issuance of qualifications to new workers who do not have the required skills to work safely in a high risk environment.

ASQA's strategic review on training in security programs in Australia was initiated in response to successive reports by Coroners investigating the deaths of patrons during or as a result of restraint or intervention by security personnel in the course of incident control, particularly around licensed premises. The Coroners' reports suggest that a number of training and assessment issues are potentially contributing factors to fatalities. ASQA's review found that one of the biggest threats to quality training in the security industry is the prevalence of extremely short courses which do not allow people to gain the required skills and competencies.

While mandatory requirements are often introduced to improve service quality and protect consumers, this can lead to risks emerging in the VET sector, as indicated in the findings of ASQA's strategic reviews into training for aged and community care in Australia and training for early childhood education and care in Australia. These reviews noted that in recent years, the growth of qualifications in these areas has been driven by government requirements to improve the standards and quality of care in these industries.

ASQA's previous strategic reviews have also highlighted that the Certificate IV in Training and Assessment (TAE40110) is of fundamental importance to quality in the entire VET system. The reports resulting from these reviews have advocated strongly for improvements to the Certificate IV—to ensure that people who are responsible for training and assessing others have sound training and assessment skills so that they can fully and properly assess learner competence. Course duration advertisements in relation to this qualification were therefore specifically examined in this review and detailed analysis of the findings is provided in Chapter 4.

The findings and impacts of ASQA's previous strategic reviews, as well as the relevant course duration findings of this review, are outlined in more detail in Appendix A.

¹ *CPCCOHS1001A Work safely in the construction industry*, also known as the White Card, is a mandatory entry-level unit for people seeking to work on construction sites in Australia.

1.3.2. Other reviews and research

The findings of ASQA's strategic reviews have been supported by the findings of other regulators' reviews of training for licensed job roles.

The report on a Western Australian Training and Accreditation Council (WA TAC) strategic audit of units of competency that lead to high-risk licences being issued in that state found that one of the main concerns of the stakeholders was

*'... the amount of training allocated for training and assessment for each learner was not sufficient to enable them to meet the requirements of the unit of competency.'*²

The WA TAC strategic audit report stressed that safety and the potential for serious consequences are a risk when training and assessment is not compliant. Significantly, this review found *'a direct relationship between delivery of courses in shorter timeframes and high non-compliance with the standards.'*³ This report also found that RTOs claimed they were shortening training because of pressure from industry clients.⁴

A NSW Fair Trading review of training for licensed occupations in the property service industry identified the short duration of training offered by some RTOs as a key issue in the industry.⁵

VET practitioners have also expressed concerns about unduly short training. The National Centre for Vocational Education Research paper, *Assessment issues in VET—minimising the level of risk*, found that practitioners believed that short duration courses presented a significant risk that students would not:

- obtain the necessary skills, and/or
- be assessed rigorously:

*'... Without exception, all the trainers, assessors and industry representatives who took part in this study commented that the duration of a course is important. Trainers and assessors argued that a course delivered in a shortened timeframe cannot deliver the rigour or depth of training and the competency required by industry or the client group. The emphasis on a fast-paced delivery was deemed to be flawed—industry may need qualified workers quickly but that there is a greater need for a competent workforce.'*⁶

² Government of Western Australia 2016, *Training and Accreditation Council: Strategic Industry Audit into Units of Competency that lead to High Risk Work Licences in Western Australia*, p. 8.

³ Ibid p 10.

⁴ Ibid p 38.

⁵ NSW Fair Trading 2016, *A review of training for licensed occupations in the New South Wales property services industry Final Report June 2016*, p. 8.

⁶ Halliday-Wynes, S and Misko, J, 2013, *Assessment issues in VET—minimising the level of risk*, National Centre for Vocational Educational and Training Research.

1.3.3. RTOs' non-compliance with Standards relevant to amount of training

In addition to the findings of its previous strategic reviews, ASQA's general regulatory experience to date demonstrates that many RTOs are struggling to comply with the Standards for RTOs that set out the course duration or 'amount of training' requirements.

Under Clauses 1.1 and 1.2 of the Standards for RTOs, RTOs are required to ensure the 'amount of training' provided meets the requirements of the training package or VET accredited course qualifications they deliver. (Further detail about the regulatory framework for course duration in VET is in Chapter 2).

To assess an RTOs compliance with the Standards for RTOs, ASQA conducts an audit. The audit includes the preparation of an initial audit report, which ASQA provides to the RTO at the end of the audit process. If ASQA has identified non-compliance, the RTO has 20 days to rectify this.⁷ In many cases, the RTO is able to address the issues leading to the non-compliance during this rectification period. If they are unable to do so, ASQA will then pursue appropriate regulatory action against the RTO.

Since 1 April 2015, when the current Standards for RTOs were implemented, ASQA has found significant rates of non-compliance with Clauses 1.1 and 1.2.

Between 1 April 2015 and 31 March 2017, ASQA finalised 1772 audits.⁸ Each ASQA audit has a defined 'scope' and assesses RTO compliance with a selection of clauses from the Standards for RTOs. Of these 1772 audits:

- 1441 audits assessed compliance with Clause 1.1, and
- 1392 audits assessed compliance with Clause 1.2.

Levels of RTO compliance with Clause 1.1 since 1 April 2015

Where ASQA assessed RTO compliance with Clause 1.1:

- At the initial audit, ASQA found non-compliance with this clause on 706 occasions (49 per cent of the total 1441 audits), that is, at almost half the audits conducted against Clause 1.1, RTOs were found not compliant with the requirement to offer a 'sufficient amount of training' consistent with the requirements of the training package or VET accredited courses.

⁷ On 1 August 2016, ASQA changed its audit process. From this date, if a compliance audit identifies highly concerning non-compliances, RTOs may not be offered a rectification period but rather be required to respond to a 'Notice of intent to impose an administrative sanction'. RTOs have 20 days to respond to such a Notice.

⁸ These are discrete finalised audits. The 1772 audits were conducted across 1355 RTOs.

- After an opportunity to rectify the non-compliance with Clause 1.1 identified at these 706 audits, 223 RTOs were still unable to demonstrate compliance (that is, 15 per cent of the 1441 audits conducted were finalised with non-compliance against Clause 1.1).

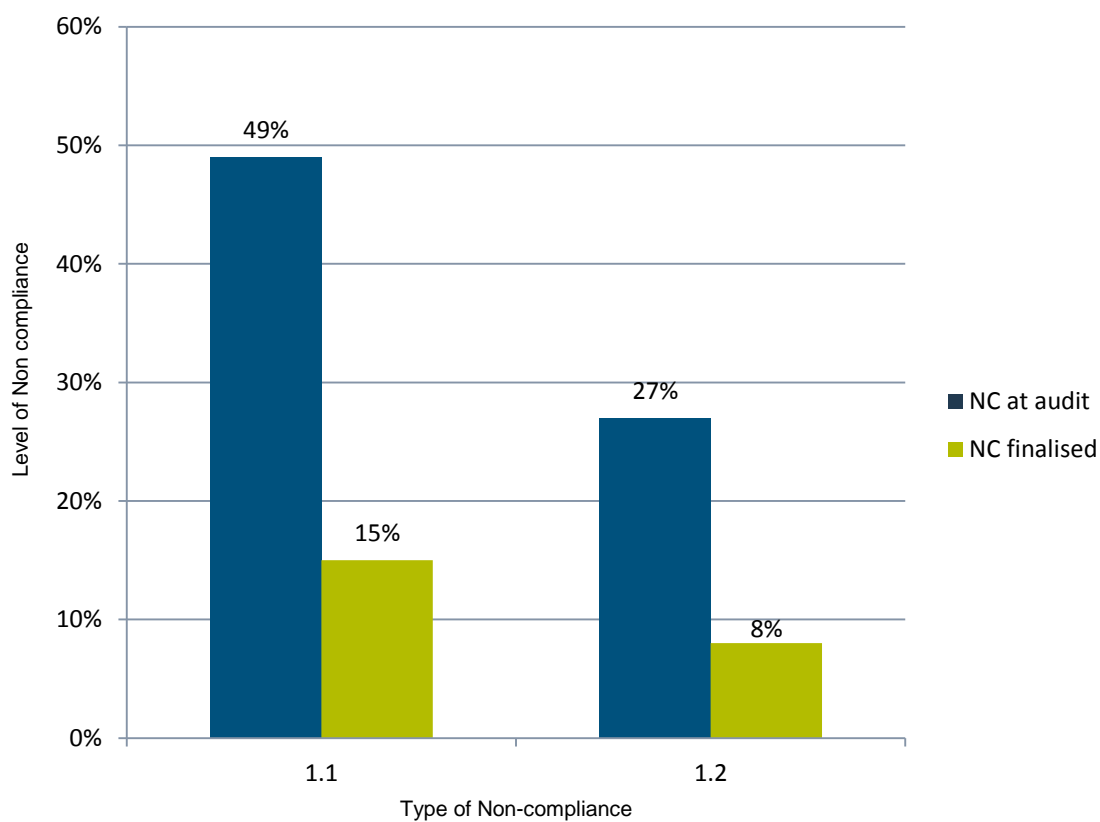
Levels of RTO compliance with Clause 1.2 since 1 April 2015

Where ASQA assessed compliance with Clause 1.2:

- At the initial audit, ASQA found non-compliance with Clause 1.2 on 375 occasions (27 per cent of the 1392 audits).
- After an opportunity to rectify the non-compliance with Clause 1.2 at these 375 audits, 117 RTOs were still unable to demonstrate compliance (that is, eight per cent of the 1392 audits conducted were finalised with non-compliance against Clause 1.2).

These results are shown in Figure 3.

Figure 3: Outcomes of audits against Clauses 1.1 and 1.2 of the Standards for RTOs, 1 April 2015 – 31 March 2017



Clause 1.1 is in the top four clauses against which RTOs are found to be non-compliant both at initial audit and after rectification.⁹

1.3.4. Complaints to ASQA about amount of training

ASQA's analysis of complaints received between 1 April 2015 and 31 March 2017 has found there were a large number of complaints about amount of training.

In the period 1 April 2015 to 31 March 2017, ASQA received 4303 reports of non-compliance by RTOs. Of these, 663 (or 15 per cent) included concerns about course duration. Course duration attracted the highest number of complaints.

1.4. Establishment of this strategic review

As a result of growing concern about the prevalence of unduly short training—evidenced by the findings of previous strategic reviews; related reviews and research; poor levels of compliance with amount of training requirements by RTOs; and the number of complaints about the issue—ASQA began researching advertised course durations on RTO websites in 2015. The preliminary findings of this research reinforced ASQA's previously identified concerns, and as a result ASQA identified 'short course duration' as a systemic risk across the VET sector.

In April 2016, ASQA released its first Regulatory Strategy¹⁰, which outlined how ASQA manages risk at both an operational (provider risk) and strategic (systemic risk) level. Systemic risk is defined as any risk likely to exist across the sector or in a concerning proportion of providers. If left untreated, significant risks of this type can have a detrimental impact on the quality of training and assessment for individuals, industry and the wider community and may lead to loss of confidence in the sector.

ASQA's Regulatory Strategy acknowledges that the complexity of systemic risks often means that ASQA cannot address the issues alone and effective outcomes require collaboration with policy, funding and regulatory agencies.

The strategy prioritised three target areas of systemic risk for focused regulatory effort in 2016-17:

1. Learner protection
2. Amount of training, and
3. The capability of VET trainers and assessors.

⁹ Where RTOs were still unable to demonstrate compliance after being provided with a rectification period, ASQA applied appropriate regulatory sanctions.

¹⁰ Australian Skills Quality Authority 2016, *Regulatory strategy report 2016-17*, viewed March 2017, http://www.asqa.gov.au/verve/_resources/ASQA_Regulatory_Strategy_2016-17.pdf

To address the systemic risk arising from the second target area, amount of training, on 21 April 2016 ASQA announced this strategic review.¹¹

The review was established to:

- examine the duration of VET courses leading to Australian Qualifications Framework (AQF) qualifications
- define and document the impact of unduly short courses on learners' ability to gain the competencies required for different industry sectors
- document the current regulatory architecture that governs the course duration requirements, including the ability of the national VET regulator to effectively regulate course duration under these arrangements
- consider the regulatory framework that applies in comparable overseas jurisdictions, and
- propose options to ensure VET quality is not compromised by unduly short training.

1.4.1. Reference committee

In light of the shared responsibility for VET quality across a range of government, industry and provider organisations, the review was informed by a reference committee, which comprised ASQA and representatives from:

- Australian Chamber of Commerce and Industry
- Australian Industry Group
- Business Council of Australia
- Australian Council of Private Education and Training
- TAFE Directors Australia
- Training Accreditation Council Western Australia
- Victorian Registration and Qualifications Authority
- Australian Industry and Skills Committee
- Department of Education and Training (Victoria)
- Department of State Development (South Australia)
- Australian Government Department of Education and Training.

¹¹ Australian Skills Quality Authority 2016, Media statement, 'ASQA to launch two new national strategic reviews, viewed March 2017, <https://www.asqa.gov.au/news-publications/news/asqa-launch-two-new-national-strategic-reviews>

A list of individuals representing these organisations is included in [Appendix B](#).

The committee's terms of reference were to provide advice to ASQA in the development of the Course Duration Strategic Review, specifically to:

- review ASQA's analysis of the course durations advertised on RTO websites
- advise on the impact of unduly short courses in relation to the importance of training outcomes to the Australian economy, industry sectors and the community, and
- advise on proposed options to ensure that the durations of VET courses are sufficient to meet the needs of Australian industries by ensuring that learners are gaining the necessary skills and competencies from each training package product.

1.4.2. Methodology

As part of this review, ASQA:

- reviewed various Australian reports and research, including its previous strategic reviews and reports by other regulators
- analysed information about RTOs' compliance resulting from audits conducted between 1 April 2015 and 31 March 2017
- analysed complaints made to ASQA about amount of training between 1 April 2015 and 31 March 2017
- commissioned research into the regulatory approaches to course duration adopted in other countries, and
- reviewed the websites of ASQA-regulated RTOs to identify and analyse advertising about course duration between March and October 2015.

1.5. Structure of this report

Chapter 2: Describes the Australian VET regulatory architecture at the general level and in relation to the regulation of course duration.

Chapter 3: Outlines how other countries regulate course duration to identify approaches relevant to Australia.

Chapter 4: Analyses the course duration advertised by RTOs to identify whether short duration courses are prevalent in particular industry sectors, specific qualifications or qualification levels.

Chapter 5: Outlines the findings of the review and makes recommendations to address the risks based on the findings and the advice of the reference committee.

2. Australia's VET sector and VET regulatory architecture

This chapter provides an overview of the VET regulatory environment and of how course duration, with varying terminology and definitions, is specified and regulated across the relevant regulatory instruments. It explains the context in which ASQA, as the national VET regulator, must operate.

It also outlines the way that course duration is determined and used by other agencies for a variety of purposes outside of the regulatory framework set for ASQA.

This chapter also demonstrates the complexity of the regulatory environment for RTOs and the challenges of providing information in a way that enables industry and learners to make informed choices about their training. Finally, it considers the question of whether duration matters in a competency-based training system.

2.1 The Australian VET sector

In the past decade, the Australian VET sector has undergone substantial reform. This reform has focused on creating an efficient, flexible and market-driven national VET system that is both engaged with and responsive to the needs of industry.

Over this period, successive governments have introduced significant regulatory reforms to the sector, including the establishment of the national regulator, ASQA; substantial enhancements to the various standards for the regulation of VET; and a strengthening of the *Australian Qualifications Framework* to improve pathways between qualifications with the intention to promote lifetime learning.

Reforms have also introduced a regulatory environment that adopts a risk-based approach while seeking to minimise the administrative burden placed on providers.

Most recently, the Australian Government introduced new arrangements for training product development to strengthen the role of industry so that training outcomes deliver the skills and competencies necessary for the workforce. The Council of Australian Governments (COAG) Industry and Skills Council (CISC) which consists of Australian Government, and state and territory ministers responsible for industry and skills portfolios oversees and directs the VET reforms.

In Australia, VET programs are provided by industry, schools, and public and private RTOs.

VET programs on offer are diverse and include:

- **Training packages**—these include nationally recognised portable qualifications. Training packages are developed by and for industry and are nationally endorsed.
- **VET accredited courses**—which are developed in response to a particular industry or niche need where no training package qualification exists. These courses are accredited by a VET regulator and are also nationally recognised.

- **Skill sets**—are groupings of nationally recognised units of competency combined to provide a clearly defined statement of the skills and knowledge required by an individual to meet industry needs or a licensing or regulatory requirement.
- **Non-accredited training**—training that is developed to meet local needs.
- **Foundation skills**— training in language, literacy and numeracy and English-language programs.

Qualifications offered in the VET sector are primarily in training packages or accredited courses, which account for more than 88 percent of program enrolments. In 2015, more than 77 per cent of program enrolments were in a training package qualification.

As at 30 June 2015, the Australian VET sector included:

- 76 endorsed training packages (containing 1672 qualifications, 1147 skill sets and 18,101 units of competency), and
- 1145 VET accredited courses.¹²

Qualifications in VET range from the certificate I to graduate diploma levels.

Qualifications in the VET sector are based on competency standards (known as units of competency) designed by industry consultation. These are also known as subjects.

In 2015, there were an estimated 4.5 million students enrolled in VET,¹³ including 3.5 million program enrolments with 4930 RTOs.¹⁴


There were also 3.2 million subject-only enrolments in 2015. Students may choose to enrol only in subjects where, for example, completion of a unit or subject is required for employment or licensing purposes (for example, a student may enrol in the unit of competency *CPCCWHS1001 Prepare to work safely in the construction industry* in order to meet the requirements to work on a construction site).

In 2015, subject-only enrolments as a proportion of total subject enrolments increased 3.5 per cent (from 7.3 per cent in 2014 to 10.8 per cent in 2015). This issue is discussed later in Chapter 2. In the absence of a benchmark in the VET regulatory framework for the amount of training to be delivered at the unit of

¹² Australian Skills Quality Authority 2015, *Australian Skills Quality Authority annual report 2014–15*.

¹³ National Centre for Vocational Educational Research 2015, *Total VET students and courses 2015*. This review uses 2015 data as the website reviews occurred in 2015.

¹⁴ Ibid. Program enrolment is the qualifications, courses and skill sets in which students are enrolled in a given period. For students enrolled in multiple programs, all programs are counted. Program enrolments do not include enrolments for students who have only enrolled in subjects (units of competency). As a result, VET program enrolments are less than the total number of students but are a more accurate measure of VET activity for the purposes of this report.



competency level, the risk of poor-quality training is increasing as the number of subject-only enrolments increases.

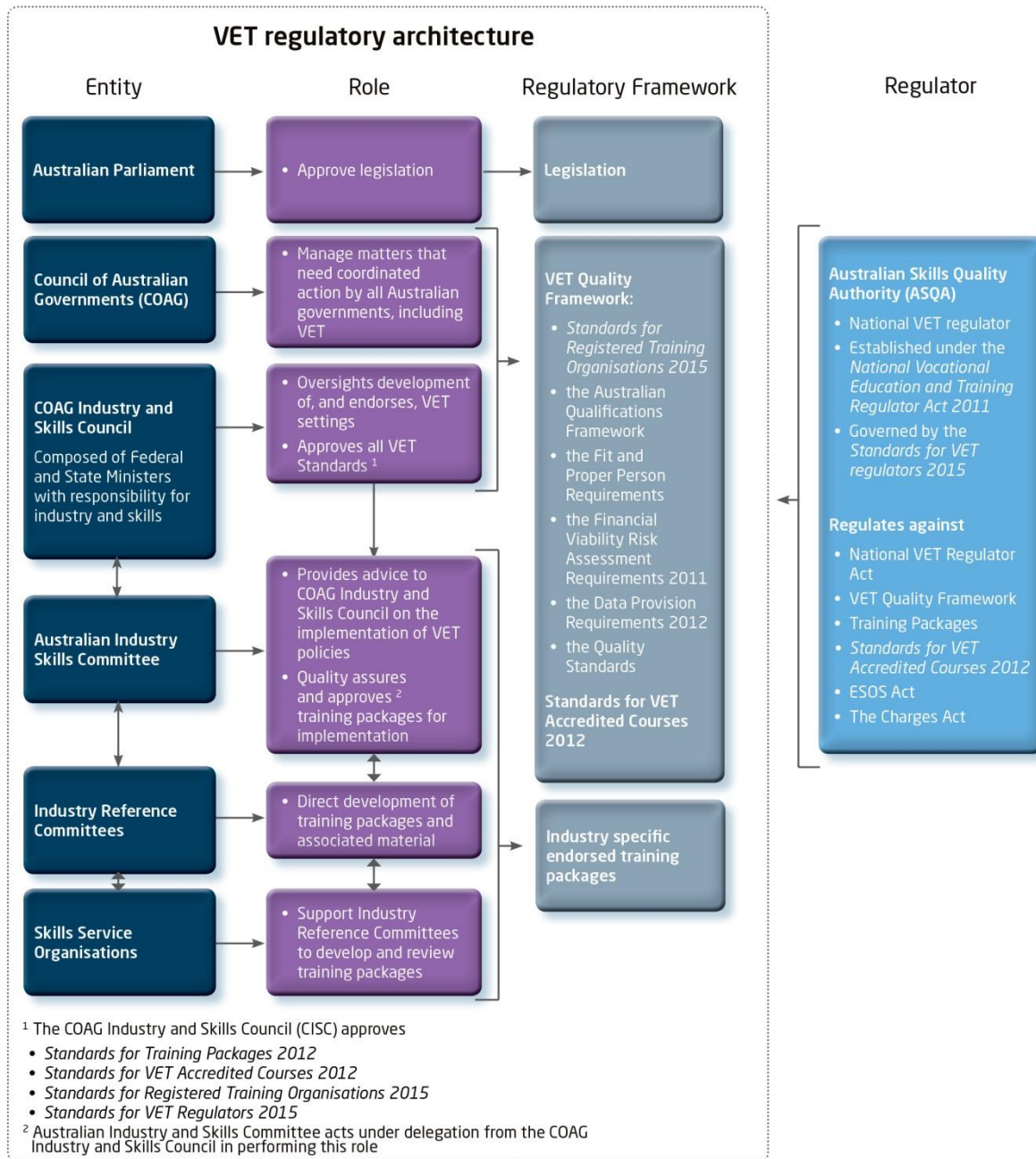
2.2 Current regulatory arrangements

The Council of Australian Governments' (COAG) Industry and Skills Council manages the overall arrangements for VET policy in line with the legislation that establishes the VET Quality Framework, and oversees the specific requirements for industry sectors through training packages.

ASQA regulates against the regulatory framework established by the COAG Industry and Skills Council on the advice of the AISC.

An overview of the VET regulatory framework is shown at Figure 4.

Figure 4: Australian VET regulatory framework¹⁵



¹⁵ Victoria and Western Australia have separate regulatory authorities for RTOs in their states: the Victorian Registration and Qualifications Authority (VRQA) in Victoria and the Training Accreditation Council (TAC) in Western Australia. In both these states, ASQA regulates RTOs with international students and those that deliver courses to students in the ACT, NSW, NT, SA, Qld or Tasmania.

ASQA's regulatory work is governed by the VET Quality Framework. All RTOs must comply, at all times, with the VET Quality Framework in order to be registered as a training provider in Australia. The VET Quality Framework is enabled by the *National Vocational Education and Training Regulator Act 2011* and comprises the:

- Australian Qualifications Framework
- *Standards for Registered Training Organisations 2015*
- *Fit and Proper Person Requirements 2011* (which, as of 2015, are part of the Standards for RTOs)
- *Financial Viability Risk Assessment Requirements 2011*
- *Data Provision Requirements 2012*
- Quality Standards.¹⁶

2.2.1 Australian Qualifications Framework

The Australian Qualifications Framework (AQF) is the national policy for qualifications in the Australian education and training system.

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

The AQF is structured in levels and qualification types, which are described through the characteristics of learning outcomes descriptors. For each qualification, the AQF describes the knowledge, skills, application and volume of learning. Categorising and describing qualification levels in this way enables consistency and clarity about the differences and relationships between qualification types.¹⁷

The AQF governs the development and accreditation of qualifications; and the policy requirements for issuing qualifications. As such, in relation to VET qualifications, its primary audiences are organisations:

- that **develop** qualifications (that is, training package developers and VET accredited course developers)
- authorised through government legislation in Australia to **accredit** AQF qualifications (that is, bodies that approve training packages and accredit VET courses), and

¹⁶ The Quality Standards were introduced as an amendment to the NVR Act in 2015. Under section 231A of the NVR Act, the Minister may make a legislative instrument to set standards relating to quality in the VET sector. To date, no additional standards have been created.

¹⁷ Australian Qualifications Framework Council 2013, *Australian Qualifications Framework Second Edition 2013*, p. 11.

- authorised through government legislation in Australia to **issue** AQF qualifications (that is, RTOs).

Developers of qualifications and accrediting bodies have to ensure qualifications meet the outcomes for a specific AQF qualification type.

The role of RTOs—in both delivering qualifications and as ‘authorised issuing organisations’—requires that they meet the AQF requirements when issuing AQF qualifications and statements of attainment to learners who have satisfied the relevant competency requirements.

2.2.2 Standards for Registered Training Organisations 2015

The Standards for RTOs, which are agreed by the COAG Industry and Skills Council, are the main instrument for assessing and monitoring RTOs to ensure quality training and assessment. Under the NVR Act, the Standards for RTOs are established as legislative instruments—mandatory standards which are binding in their application.

The Standards for RTOs establish the requirements each RTO needs to meet, including the training and assessment requirements (designed to meet industry needs as set out in the training package or VET accredited course). However, the Standards for RTOs do not prescribe the methods by which RTOs must meet these requirements. This non-prescriptive approach:

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

2.2.3 Nationally recognised training products

Training packages

The cornerstone of the Australian VET system is the key leadership role played by industry. This role includes the development of industry specific **training packages**.

Training packages:

- through consultation with industry, determine the industry-specific requirements for particular qualifications that are required to perform various job roles—these requirements are specified in competency standards (also known as units of competency), and
- set out what is to be achieved, but do not dictate how it is to be achieved, allowing RTOs the flexibility to determine how they will deliver training and assessment.

In other words, while training packages are designed to guide what skills and knowledge are imparted to learners, they do not dictate how the training should be conducted.¹⁸

ASQA regulates RTOs' compliance against the requirements of specific training packages by reviewing the training and assessment that RTOs plan and deliver for the relevant qualifications.

The development of training packages is governed by the *Standards for Training Packages 2012*, which outline the required components for the design and development of training packages.

Training packages are:

- Developed by **Industry Reference Committees (IRCs)**—IRCs comprise people with experience, knowledge and skills within the particular industry and are supported by professional Skills Service Organisations (SSOs).
- Submitted to the **Australian Industry and Skills Committee (AISC)** for quality assurance and approval—The AISC comprises industry leaders nominated by Australian, state and territory ministers with responsibility for skills and training. It provides industry with a formal role in policy direction and decision-making for the vocational education and training sector.
- **Overseen by the COAG Industry and Skills Council (CISC)**. CISC is advised by the Australian Industry and Skills Committee.

Each training package contains both endorsed and non-endorsed components:

- The requirements that industry specifies to be delivered are known as the **'endorsed' components**. The endorsed components of a training package are units of competency; the assessment requirements associated with each unit of competency; qualifications; and credit arrangements. RTOs are required to comply with the endorsed components and ASQA audits these components.
- The non-endorsed, quality assured components are called **companion volumes**. These volumes contain industry advice to RTOs on different aspects of implementation.¹⁹ ASQA cannot audit RTO delivery against these non-endorsed components of training packages, as they are advisory only.

The duration requirements in training packages are discussed in section 2.3.3 of this report.

VET accredited courses

In addition to training packages, the Australian VET system also uses accredited VET courses to meet industry requirements for training. VET accredited courses are also nationally recognised qualifications,

¹⁸ Australian Industry and Skills Committee 2016, *Training Package Development and Endorsement Process Policy*, p. 5.

¹⁹ Australian Government Department of Industry 2014, *Standards for Training Packages* p. 3.

developed in consultation with industry. These courses are developed to address niche and/or new and emerging areas where no suitable training package qualification exists.

VET accredited courses are developed by course developers, often RTOs or private organisations with a particular interest and expertise in specific industry areas. Proposed VET accredited courses are submitted to a VET regulator²⁰ for assessment and accreditation.

To be accredited, a VET course must be assessed by the regulator as compliant with the *Standards for VET Accredited Courses 2012* and the Australian Qualifications Framework (AQF).

The standards specify that qualifications will be based on 'an established industry, enterprise, education, legislative or community need.'²¹

VET accredited courses can only be delivered by an RTO.

The duration requirements in VET accredited courses are discussed in section 2.3.4.

2.3 The VET regulatory framework and course duration

A key principle underpinning the Australian VET system is the commitment to competency-based training. Competency-based training is centred on demonstrated competence against industry-defined standards of performance rather than relying on strict course durations. It also allows for the skills and knowledge that a learner has acquired previously to be formally recognised.

The current regulatory framework enshrines the concept of competency-based training through:

- industry's role in determining the training package competencies, and
- providing RTOs with the flexibility to determine training and assessment strategies in response to industry and learner needs.

At the heart of competency-based training is the concept that individuals learn at different rates, through different modes and in different environments. A learner's rate of progress is determined by demonstrated competency rather than by time served or course duration.

The following section:

- outlines how the VET regulatory framework (which is used to regulate RTOs' delivery and assessment of nationally recognised training products) defines course duration for various purposes

²⁰ Australian Skills Quality Authority, Victorian Registration and Qualifications Authority and Western Australian Training Accreditation Council.

²¹ Australian Government 2013, *Standards for VET Accredited Courses 2012*, p. 7.

- describes how durations in the VET system are also determined and used by other agencies for different purposes (additional to those in the VET Quality Framework)
- provides examples of where key stakeholders (such as occupational licensing regulators) have imposed mandated course durations as a way of addressing their concerns about the quality of training delivery/unduly short training, and
- considers the question of whether duration matters in competency-based training.

2.3.1 Course duration definitions

The regulation of course duration is governed by a range of requirements set out in the:

- Australian Qualifications Framework (AQF)
- *Standards for Training Packages 2012* (for training package qualifications)
- *Standards for VET Accredited Courses 2012* (for accredited courses), and
- *Standards for Registered Training Organisations 2015*.

The AQF and the various standards use different terminology to define course duration in the VET system. These are summarised in Table 1.

Table 1: Definitions of duration

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

* Source: Australian Qualifications Framework (AQF) and Standards for Training Packages 2012

** Source: Standards for VET Accredited Courses 2012, Users' Guide to the Standards for VET Accredited Courses, ASQA Accredited Course Document Template

† Source: Standards for RTOs 2015

2.3.2 AQF volume of learning

The AQF, through the **volume of learning**, sets the overarching framework for the establishment of course duration. The AQF volume of learning is given effect through the *Standards for Training Packages 2012* and the *Standards for VET Accredited Courses 2012* which govern the development of training package qualifications and accredited courses. The volume of learning describes how long a typical learner would normally take to develop all the required skills and knowledge at that qualification level. It is expressed in a range for each qualification level.

Definition

The second edition of the AQF from 2013 defines volume of learning in the following manner:

*'... A volume of learning is included as an integral part of the descriptor for each qualification type. The volume of learning is a dimension of the complexity of the qualification type. It identifies the notional duration of **all activities** required for the achievement of the learning outcomes specified for a particular AQF qualification type. It is expressed in equivalent full-time years.'*²²

The volume of learning includes all teaching, learning and assessment activities that are required to be undertaken by the typical student to achieve the learning outcomes of the qualification.²³ This may include guided learning (classes, lectures, tutorials, online or self-paced study), individual study, research, learning activities in the workplace and assessment activities.²⁴

The volume of learning definition provides a logical framework for the developers of training products. It is in keeping with the higher level objective of the AQF of providing an organising framework that is designed to apply to all three education sectors.

²² Australian Qualifications Framework Council 2013, *Australian Qualifications Framework Second Edition 2013*, p. 11.

²³ Australian Qualifications Framework Council 2012, *Volume of Learning: An Explanation*, viewed March 2017 <http://www.aqf.edu.au/wp-content/uploads/2013/06/Volume-of-Learning-Explanation.pdf>. The full extract is included at Appendix C.

²⁴ Ibid.

However, given the diversity of the VET sector, the lack of specificity in the AQF volume of learning between RTO-supervised training/assessment and learner-directed activities, leads to confusion. In particular, RTOs have differing interpretations of the requirements. This results in a lack of transparency for learners and industry about what effort in time is required for the learner to complete the qualification.

Duration of qualifications

Table 2 illustrates the AQF volume of learning, which describes how long a learner would take to develop all the required skills and knowledge at a particular qualification level. The AQF volume of learning is expressed as a range.

Table 2: AQF volume of learning range

	Australian Qualifications Framework volume of learning range							
Qualification level	Certificate I	Certificate II	Certificate III	Certificate IV	Diploma	Advanced Diploma	Graduate Certificate	Graduate Diploma
Range in years	0.5 – 1 year	0.5 – 1 year	1 – 2 years	0.5 – 2 years	1 -2 years	1.5 – 2 years	0.5 – 1 year	1 – 2 years
Range in hours	600- 1200 hours	600 – 1200 hours	1200 – 2400 hours	600 – 2400 hours	1200 – 2400 hours	1800 – 2400 hours	600 – 1200 hours	1200 – 2400 hours

The explanatory material included in the AQF makes clear that the volume of learning range is not intended to be rigidly prescriptive; however, the AQF also makes it clear that variations from the range must be justifiable.²⁵

The explanatory material sets out a number of scenarios where the duration of the delivery of the qualification may vary from the volume of learning specified for the qualification **as long as students are given sufficient opportunity to achieve the learning outcomes for the qualification type, level and discipline.**

The explanation states:

‘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.

²⁵ Ibid.

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 a pedagogical rationale to support the variation.²⁶

2.3.3 Duration requirements in training packages

When developing training package qualifications, the IRCs (supported by SSOs) are required to comply with the AQF volume of learning range. Standard 8 of the *Standards for Training Packages 2012* requires that 'qualifications comply with the Australian Qualifications Framework specification for that qualification type'.

However, the *Standards for Training Packages 2012* do not require training packages to specify:

- the actual volume of learning that RTOs must deliver, or
- any other delivery requirements (such as how much time a student would expect to spend on supervised or unsupervised learning activities).

Training package standards do enable industry to provide a level of specificity on assessment conditions and evidence at the unit of competency level. In some sectors, this is used to specify the hours a learner must have spent working in a particular role or function, or the number of times a learner needs to demonstrate competence. As such, the Assessment Requirements (which are part of the endorsed component of training packages) can set a default minimum duration for completion of qualifications where developers choose to include them.

But for the most part, training packages include little information on the issue of volume of learning or course duration. As the AQF range applies to qualifications rather than units of competency, there is no guidance at all provided to developers, RTOs, learners or regulators about the expected volume of learning for each unit of competency.

Some developers include advice about duration in the non-endorsed companion volumes to their training packages, which provides guidance to RTOs about implementation. However, this practice is discretionary and variable. In any case, as previously mentioned, ASQA cannot regulate RTO delivery against the non-endorsed components of training packages.

The flexibility of the AQF volume of learning range, the fact that this range does not distinguish between RTO-supervised and learner-directed activities, and its application at qualification level, combined with the fact that training packages are largely silent on industry requirements for duration, means that RTOs must interpret the requirements of the training package when developing their training and assessment strategies including determining the volume of learning that is required.

²⁶ Ibid.

2.3.4 Duration requirements in accredited courses

Accreditation of a VET course by ASQA means that the course and its outcomes are nationally recognised. A VET accredited course can only be delivered by an RTO.

VET accredited courses can be made up of a combination of:

- units of competency developed by the course owner, and/or
- training package units of competency.²⁷

In order for a course to be accredited, the applicant for accreditation must demonstrate to ASQA that the course meets the course design requirements of the *Standards for VET Accredited Courses 2012*.

The accredited courses standards (VAC 7.3) require course outcomes to be consistent with the relevant AQF descriptor. The *Users' Guide to the Standards for VET Accredited Courses*²⁸ relies on the definition of volume of learning in the AQF. The definition includes all teaching and learning activities such as guided learning (classes, lectures, tutorials, online or self-paced study), individual study, research, learning activities in the workplace and assessment activities.

The *National Template for Course Documentation* (Section B.1.2) goes further than requiring adherence to the AQF volume of learning requirements and requires course developers to state the 'nominal duration of the course in hours'.²⁹

In determining the nominal duration of the course in hours, course developers must provide a detailed description of the course components, including the **nominal (supervised) hours** for each unit and **unsupervised hours** required for the qualification.

- **Nominal (supervised) hours** represent the supervised structured learning and assessment activity required to sufficiently address the content of each **unit** (acknowledging that progress can vary between learners).
- **Unsupervised hours** represent activities that contribute to achieving the **course** outcomes that are not supervised by the RTO trainer or assessor.

²⁷ Australian Skills Quality Authority 2017, 'Accreditation with ASQA', web page, viewed March 2017, <https://www.asqa.gov.au/course-accreditation/accreditation-asqa>.

²⁸ Australian Skills Quality Authority 2017, *Users' Guide to the Standards for VET Accredited Courses*, viewed March 2017, <https://www.asqa.gov.au/news-publications/news/updated-users-guide-standards-vet-accredited-courses>

²⁹ Australian Skills Quality Authority 2017, 'Stage 3 - Course design and submission', web page, viewed March 2017, <https://www.asqa.gov.au/course-accreditation/apply-vet-course-accreditation/stage-3-course-design-and-submission>.

ASQA's *Accredited Course Document Template* explains that **nominal duration of the course** comprises the nominal (supervised) hours of each unit included in the course plus the unsupervised hours for the course. The supervised and unsupervised hours are added together to identify the volume of learning for the course.³⁰

If a course includes units of competency from a training package, the VET course developer must use the nominal hours developed by the Victorian Department of Education and Training.

These nominal hours:

- are based on consideration of the amount of time required to adequately deliver and assess the **supervised** components of the training package to an average student for each **unit of competency**, and
- do not include hours associated with non-supervised work experience, field work, work placement or private study.³¹

As a result, RTOs receive more specification on 'how much training the RTO should deliver' for accredited courses than they do for training package products. This also means that where RTOs are delivering accredited courses, the amount of training the RTO delivers can be audited by ASQA.

2.3.5 Duration requirements in the Standards for RTOs

Clauses 1.1 and 1.2 of the Standards for RTOs set out the requirements RTOs are expected to meet in relation to course duration. These are the key measures against which ASQA is able to regulate RTOs in relation to course duration:

*1.1. The RTO's training and assessment strategies and practices, including the **amount of training** they provide, are consistent with the requirements of training packages and VET accredited courses and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.*

³⁰ Australian Skills Quality Authority 2017, 'Stage 3—Course design and submission', web page' viewed March 2017, <https://www.asqa.gov.au/course-accreditation/apply-vet-course-accreditation/stage-3-course-design-and-submission>.

³¹ Further information about the nominal hours developed by the Victorian Department of Education and Training and how they are used is at section 2.4.2

1.2. For the purposes of Clause 1.1, the RTO determines the **amount of training** they provide to each learner with regard to:

a) the existing skills, knowledge and the experience of the learner

b) the mode of delivery, and

c) where a full qualification is not being delivered, the number of units and/or modules being delivered as a proportion of the full qualification.³²

The term 'amount of training' is not defined within the Standards for RTOs. However, as the Standards link the amount of training to the requirements of the relevant training package or accredited course (which are required to comply with the AQF specifications including volume of learning into the qualification), the term is analogous to volume of learning in the AQF.

Both terms:

- are focused on what is required to enable the learner to achieve the competencies for the related qualification, and
- incorporate both supervised and unsupervised activities.

Clause 1.2 provides for RTOs to determine an amount of training that they deem to be sufficient to meet the needs of their enrolled learners.

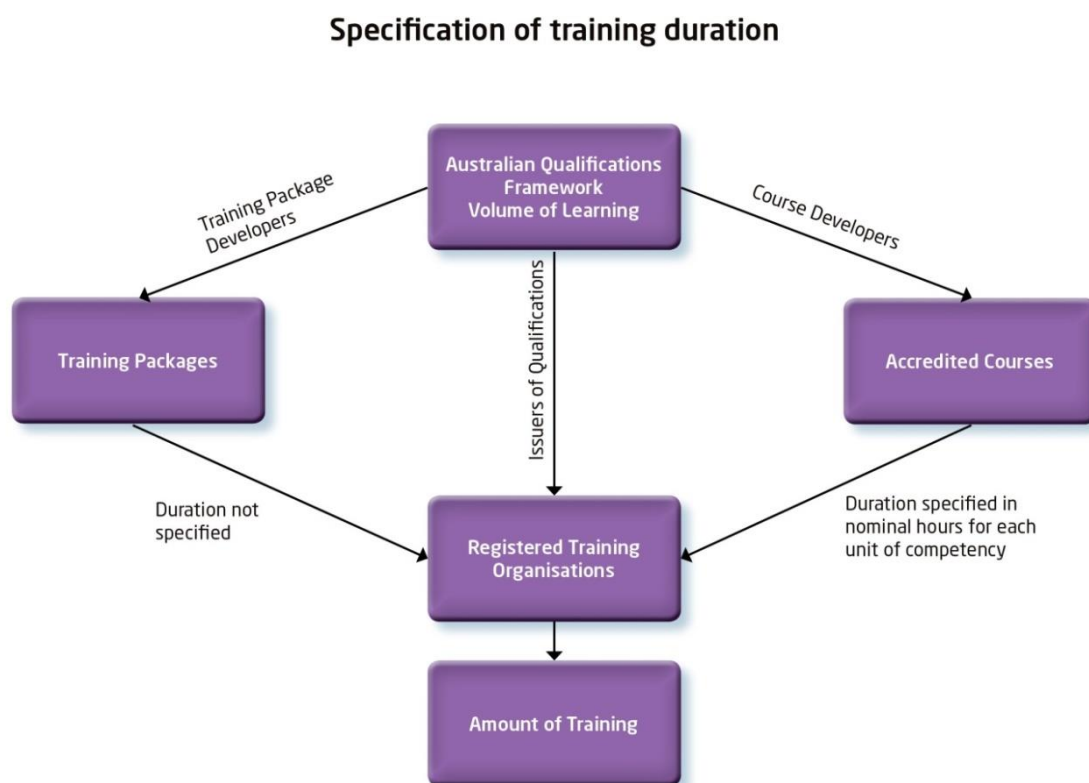
When determining the amount of training, variance from the AQF volume of learning measures may occur on the basis of learner's individual skills. Where an RTO's amount of training falls significantly outside of the AQF's prescribed volume of learning, it is required to provide a pedagogical rationale at the time of audit.

As outlined previously, VET accredited courses provide more guidance to RTOs on the issue of amount of training required (both supervised and unsupervised). In contrast, the training package standards require no specification in the endorsed component of training packages (apart from the Assessment Requirements). RTOs must make their own judgement about the appropriate amount of training and what proportion of the training is delivered in a supervised or unsupervised manner.

³² Australian Government 2014, *Standards for Registered Training Organisations (RTOs) 2015*, viewed March 2017, <https://www.legislation.gov.au/Details/F2014L01377>.

The differing ways that training duration is specified and applied in the VET sector is illustrated in Figure 5.

Figure 5: Specification of training duration



Because VET accredited courses contain duration and most training packages do not, ASQA’s ability to regulate ‘amount of training’ against the Standards for RTOs is stronger for VET accredited courses than it is for training package qualifications. For VET accredited courses, there is a clear benchmark for duration against both supervised and unsupervised activities.

This highlights the lack of clear and consistent requirements or benchmarks based on how much training a learner new to a particular training area would need to undertake to gain all of the required skills and competencies. There appears to be no rationale for this inconsistency between the two types of nationally recognised training products.

2.3.6 ASQA’s regulation of amount of training

Where ASQA has a concern about the amount of training being provided by an RTO, it conducts a compliance audit against Standard 1 of the Standards for RTOs.

ASQA does not have the ability to ban or automatically impose a sanction on training courses that are delivered in timeframes less than those prescribed by the AQF volume of learning range, even when it holds legitimate concerns that the course is unduly short.

This is because the volume of learning range in the AQF is indicative and flexible. It is always open to an RTO to provide evidence to justify what may appear to be unduly short training.

Accordingly, if an RTO is delivering a course in a significantly shorter time period than that specified in the AQF volume of learning range, ASQA must undertake an audit to provide the RTO with an opportunity to demonstrate that the duration of its courses is appropriate. As set out in the AQF's *Volume of learning: an explanation*³³, such evidence could depend upon:

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

ASQA's *Users' guide to the Standards for RTOs 2015* advises RTOs:

'In a competency-based training environment, learners are not required to study for a specified number of weeks or months; however, your RTO must still be able to identify and explain any significant variations from the time periods described in the AQF.'

If a course is structured so as to be completed in a shorter time period than that described in the AQF, you will need to clearly describe, using a rationale based on the previous skills and knowledge and the needs of learners, how a specific learner cohort:

- has the characteristics to achieve the required rigour and depth of training

- can meet all of the competency requirements in a shorter timeframe.

Your description must take into account the need to allow learners to reflect on and absorb the knowledge, to practise the skills in different contexts and learn to apply the skills and knowledge in the varied environments that the 'real world' offers before being assessed.

RTOs are required to use their professional expertise to develop a strategy or strategies for each training product they are registered to deliver, in the format they choose. Different strategies may

³³ Australian Qualifications Framework Council 2012, *Volume of Learning: An Explanation*, viewed March 2017 <http://www.aqf.edu.au/wp-content/uploads/2013/06/Volume-of-Learning-Explanation.pdf>.

need to be developed for different delivery models or target groups. The strategy must be consistent with the advertising and other material you provide to prospective learners.’³⁴

The AQF explanation emphasises the importance of RTO decisions about duration being firmly based on a rationale that supports sufficient and appropriate student learning and the integrity of the qualifications delivered:

‘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.’³⁵

Within the broad advice provided by the AQF, each RTO must use its professional judgement to determine the amount of training to provide. In determining whether RTOs have provided a sufficient amount of training, the regulator must also exercise its professional judgement on a case-by-case basis.

In the absence of any specific guidance to RTOs or the regulator about the amount of training required specific to the training package qualifications and units of competency, there can be differing professional judgements between RTOs and the regulator about the required amount of training.

2.4 Other ways that duration is determined and used in VET

2.4.1 Nominal hours for recording training activity

Nominal hours are established for the purpose of recording training activity effort in the VET system and used by the National Centre for Vocational Education Research (NCVER) to report national training activity.³⁶

Data such as ‘national training activity’ is used to support policy development, research and evaluation in VET and to underpin public accountability and measurement of state and national VET systems.³⁷

³⁴ Australian Skills Quality Authority 2015, *Users’ Guide to the Standards for Registered Training Organisations (RTOs) 2015*, pages 19, 21

³⁵ Australian Qualifications Framework Council 2012, *Volume of Learning: An Explanation*, viewed March 2017 <http://www.aqf.edu.au/wp-content/uploads/2013/06/Volume-of-Learning-Explanation.pdf>.

³⁶ NCVER is contracted to manage the Australian VET statistical collections and surveys on behalf of the Australian and state and territory governments. Source: National Centre for Vocational Educational Research 2016, *Nationally agreed nominal hours*, viewed March 2017, <https://www.ncver.edu.au/publications/publications/all-publications/statistical-standard-software/nationally-agreed-nominal-hours>

'Nominal hours' is a value assigned to a program or subject that nominally represents the anticipated hours of supervised training deemed necessary to conduct the training and assessment activities associated with the program or subject.

Nominal hours are allocated assuming a typical classroom-based delivery and assessment strategy and do not include hours associated with non-supervised work experience, field work, work placement or private study.³⁸

They are used to analyse supervised training activity and generally represent the anticipated hours of structured supervised training and assessment.

NCVER uses nominal hours to calculate agreed nominal hour values for each unit/module. Agreed nominal hour values enable nationally consistent reporting of training activity.

The nominal hours are used by RTOs in their reports of activity submitted to NCVER or the state or territory training authority in their jurisdiction.

2.4.2 Nominal hours used for planning delivery and funding

When state and territory governments contract with training providers through their VET funding programs, they usually specify a range of training quality parameters, including duration. Through these contracts, training purchasers often set 'nominal hours'. This enables funding and purchasing agencies to specify the form and duration of the RTO effort required for funding purposes. In this context, state and territory governments rely on duration, among other factors, as a measure of the quality of the training they fund.

'Nominal hours' are developed by the Victorian Department of Education and Training at the unit of competency level. The figure value determined for each unit of competency is used to build a range of hours from minimum to maximum for each qualification. Qualification hours align maximum hours to a realistic vocational outcome (or job outcome) for funding purposes based on evidence of actual delivery practice.

The Victorian Department of Education and Training nominal hours are based on consideration of the amount of time required to adequately deliver and assess the **supervised** components of the training package to an average student (that is, the amount of time required for supervised learning and assessment) for each unit of competency. The hours do not include hours associated with non-supervised work experience, field work, work placement or private study.

³⁷ Ibid

³⁸ National Centre for Vocational Educational Research 2016, AVETMISS *data element definitions*, edition 2.2, p 119, viewed March 2017 <https://www.ncver.edu.au/support/topics/avetmiss/avetmiss-data-element-definitions>.

Victoria uses these hourly ranges for funding purposes. The nominal hours developed by the Victorian Department are also used as a tool by most states and territories to determine funding arrangements for publicly funded VET, but the way they use them may vary.³⁹

As noted in section 2.3.4, VET accredited course developers must also use nominal hours when they are including units of competency from a training package in an accredited course.

2.4.3 Nominal durations in apprenticeships and traineeships

All jurisdictions have a process for declaring which qualifications are suitable as apprenticeship or traineeship pathways, although the process varies between jurisdictions. The declaration process includes determining a nominal duration for a training contract.⁴⁰

In the case of apprenticeships and traineeships, nominal duration refers to the anticipated time in months for a client to complete a training contract.⁴¹ Nominal durations therefore only apply to VET qualifications that are delivered via an apprenticeship or traineeship pathway.

Although in some jurisdictions nominal durations are now less important due to implementation of competency-based progress in apprenticeships, ASQA's analysis of course duration advertising shows that nominal durations still influence course durations in qualifications undertaken through an apprenticeship pathway. ASQA found a number of qualifications delivered through apprenticeship pathways for which a significant amount of advertised course duration met the AQF volume of learning requirements. This is discussed in detail in Chapter 4.

States and territories have different industry consultation arrangements and different methodologies for determining durations in relation to apprenticeships which creates a level of complexity for industry and learners. However, at the time of this report's publication, a national process is underway to harmonise apprenticeship pathways and durations as much as possible.⁴²

³⁹ Nominal hours do not dictate states' and territories' resourcing arrangements with RTOs. States and territories may have purchasing hours that differ from national nominal hours.

⁴⁰ A training contract is a legally binding agreement between an apprentice or trainee and an employer which defines the rights and responsibilities of each party. These include the employer guaranteeing to train the apprentice or trainee in the agreed occupation or training area, and to allow time off work to attend any required off-the-job training; and the apprentice or trainee agreeing to learn all aspects of the occupation or training area, and to work for the employer for a specified period. Source: National Centre for Vocational Educational Research 2017, *VOCEDplus*, *Glossary term: Training contract*, viewed March 2017, <http://www.voced.edu.au/content/glossary-term-training-contract>.

⁴¹ National Centre for Vocational Educational Research 2016, *AVETMISS data element definitions: edition 2.2*, page 117, viewed March 2017 <https://www.ncver.edu.au/publications/publications/all-publications/statistical-standard-software/avetmiss-data-element-definitions-edition-2.2>.

⁴² The Australian Apprenticeships Reform Working Group (AARWG) which coordinates policy and administrative arrangements and implements Council of Australian Governments Industry and Skills

2.5 Durations used in occupational licensing

Occupational licences are generally imposed by state and territory governments as a way of protecting the health and safety of consumers, workers and the general public. They frequently consist of both skill-related and non-skill requirements that must be met in order for a person to be granted a licence to carry out the regulated activity.

Occupational licences that have skill-based requirements frequently use the nationally recognised skill sets or qualifications delivered by the VET system as the basis for meeting such requirements. However, while VET qualifications are competency-based and not time-based, in some cases occupational regulators have imposed mandated course durations as a way of addressing their concerns about the quality of training delivery. An alternative approach adopted by some regulators is to mandate a period of practical experience following completion of training before application for an open licence is permitted.

ASQA's strategic review into training for the security industry found that longstanding concern about RTOs providing poor-quality security training and assessment has resulted in some jurisdictional regulators imposing state-specific regulatory requirements on RTOs. These state-specific requirements are over and above—or in duplication of—those required by the industry training package and the national standards that must be met by RTOs. One example of these additional requirements is illustrated in the case study below.

Case study—security training in NSW

In New South Wales, the licensing authority for the security industry is the NSW Police Force Security Licensing & Enforcement Directorate (SLED). The current regulatory model was developed following a 2009 investigation into security industry training by the NSW Independent Commission Against Corruption and a subsequent independent review in 2010 of the NSW Police regulation of the security industry.

In New South Wales:

- RTOs delivering security training must hold a relevant master licence issued by SLED.
- All trainers must hold a security training licence.
- The RTO must also be approved by the Commissioner of Police to deliver security training and assessment and comply with conditions imposed on RTOs by the Commissioner.
- There are mandated course duration and assessment requirements, and other criteria as determined by the Commissioner.

The Security Licensing & Enforcement Directorate is responsible for ensuring RTOs comply with

Council actions related to Australian Apprenticeship issues is overseeing the work. The group comprises Australian, state and territory government representatives from departments with responsibility for apprenticeships.

Case study—security training in NSW

these legislative requirements.⁴³

The NSW Security Licence Course Structure is set by SLED and requires that security licence courses and individual course modules must not be of shorter duration than the minimum hours specified in the document unless the RTO has been granted prior written approval from the SLED. A class size of 10 to 15 students is also set by SLED. The course structure also requires that security licensing courses, including all learning and assessment tasks, must be conducted in a supervised, face-to-face environment.⁴⁴

These state and territory imposed requirements can lead to significant variation in the licensing requirements that apply in different jurisdictions and can, perversely, lead to further reduction in the quality of VET outcomes. For example, some jurisdictions simply require licence applicants to hold the relevant VET qualification. Others can require that applicants hold the relevant VET qualification and also meet additional checks, including undertaking training and assessment that meets particular delivery requirements set, and often licensed by, the state-based regulator.

Where these licences are captured by mutual recognition provisions, significant distortions to the training market can manifest—as learners actively gravitate to training in jurisdictions where the licensing regime applies the least additional regulation. RTOs can seek to exploit these complex arrangements by providing low-quality training, which then erodes the credibility of the VET and licensing regimes.

An example of the variations across jurisdictions in the security industry is illustrated in the case study below.

Case study—state-based occupational licensing in security industry

Each state and territory sets different occupational licensing requirements for the security industry. The requirements set by NSW (outlined above) are regarded as the most stringent. RTOs are tailoring their training delivery and assessment to respond to the requirements of the various occupational licensing bodies.

A search in the national VET register training.gov.au can identify RTOs delivering security training across jurisdictions.

One RTO's website advises potential students that each state's security training is set by regulations and specific state requirements. It provides the facility to click on each state in map of Australia to determine the individual state requirements including units and duration of security courses.

The RTO offers the Certificate II in Security Operations (CPP20212) in Queensland, New South

⁴³ Australian Skills Quality Authority 2016, *Training in security programs in Australia*, pp 4, 25, 28, viewed March 2017, <https://www.asqa.gov.au/about/strategic-reviews/training-security-programs-2016>.

⁴⁴ New South Wales Police Force 2015, *NSW Security Licence Course Structure (D/2015/209528)*, viewed March 2017, http://www.police.nsw.gov.au/_data/assets/pdf_file/0019/345700/NSW_Security_Licence_Course_Structure_D2015209528.pdf.

Wales and Western Australia and provides the following information about duration:

State	Duration
Queensland	Two days classroom, plus self-paced study
New South Wales	102 hours of face-to-face learning in a classroom and simulated work environment.
Western Australia	10 days (80 hours)

This complexity has a substantial impact on a sector which is already notoriously complex:

- It creates inefficient and overlapping regulation (for example between ASQA and occupational licensing regulators) which ultimately drives up costs for governments, business and consumers.
- It generates significant regulatory burden for providers who are subject to multiple regulatory frameworks and reporting requirements.
- It triggers significant variations in the durations of courses that providers in different jurisdictions offer for the same qualification, without any apparent rationale. These variations are confusing for industry, employers and students. This inconsistency also serves to undermine confidence in VET by calling into question whether these nationally portable qualifications are equivalent.

2.6 Does duration matter in competency-based training?

Competency-based training is at the core of the Australian VET system (as it is in many systems around the world). The central tenet of competency-based training is that a learner's rate of progress is determined by their demonstrated competency, rather than by how long they have spent training. Nevertheless, providing courses of sufficient duration is clearly a prerequisite of providing quality training and assessment.

Australia applies a broad volume of learning range to an entire level of the AQF, which in turn applies to all individual qualifications at that level. Chapter 3 outlines how this approach differs to other major VET systems internationally, many of which allocate unique notional learning times to each individual qualification. Some VET systems assign both credit points and actual hours to individual qualifications; some are moving to adopt consistent and more specific approaches to specifying guided and unsupervised hours for each qualification.

Despite the fact that the absence of duration in training packages may be largely driven by concerns that insertion of time would violate the core principle of competency based training, it appears from the examples discussed in this chapter that duration does matter in VET. This chapter has shown that stakeholders mandate duration in other ways for a variety of purposes, including:

- the nominal hours set for national reporting purposes, which are seen as a critical tool for policy development, evaluation and accountability in the system

- the nominal hours used by funding and purchasing agencies to ensure some quality measure around what they are buying
- the nominal durations in apprenticeships sought by industry to provide an assurance about the competence of graduates, and
- the durations mandated by occupational licensing regulators due to their concern about short duration VET qualifications.

In addition this chapter has highlighted an anomaly between how 'amount of training' is regulated for training packages and accredited courses (the two types of nationally recognised training products). While training packages mostly do not set requirements for duration, accredited courses must include nominal times. This inconsistency in the structural and regulatory requirements has no clear rationale.

2.7 Summary

This chapter documents the VET regulatory framework, specifically in relation to course duration. The regulatory framework enshrines the concept of competency-based training. However, how this is achieved for training packages and VET accredited courses (both of which produce nationally recognised qualifications) is different, with VET accredited courses requiring a greater degree of specification of duration.


The regulatory framework requires RTOs to exercise significant professional judgement in interpreting the requirements of training packages and the needs of their learner cohorts. ASQA is then responsible for ensuring the compliance of RTOs against these requirements by exercising its own professional judgement.

It is a complex regulatory framework for RTOs to comply with and for ASQA to regulate against.

The flexibility inherent in the AQF volume of learning requirements and the Standards for RTOs allows RTOs flexibility to deliver training that caters specifically to learners' individual needs. However, the flexibility inherent in the training packages may be confusing for some RTOs. This flexibility leaves the system open to inconsistent interpretations of the amount of training required due to:

- the volume of learning range applying at qualification and not unit level
- the inclusion of both supervised and unsupervised learning activity in the definition of volume of learning, without the requirement for these components to be separately specified
- the absence of a benchmark for the duration of delivery of training in training packages in either units or qualifications, and
- reliance on RTOs' professional judgement about the required amount of training for training package qualifications.

The flexibility can open the door for unscrupulous providers to assert that the apparent short duration of their courses is due to the way they have allocated volume of learning across RTO supervised and learner



directed learning activities. That is, they can assert that the short duration refers only to the supervised activities and that the bulk of the course is 'self-directed'.

For many RTOs, further guidance in relation to industry expectations for training and assessment delivery—including the amount of training—may be a welcome way of improving their compliance without the need for an audit by ASQA and protecting them from unfair competition.

The review has also documented the various ways that duration is determined and used outside of the VET Quality Framework and has suggested that the impacts in terms of regulatory burden and transparency for consumers are significant. Where this occurs, duration is effectively set, not by industry, but by government funding and licensing agencies.

Importantly, the international and local examples discussed in this review demonstrate that in a competency-based system there are still circumstances in which mandating duration is considered a necessary means of regulating quality.

3. International approaches to regulating course duration

This chapter outlines how other countries regulate course duration, including the variety of approaches used and some recent developments. While there are some similarities between the broad principles of these regulatory approaches, international regulatory frameworks vary considerably across a number of key quality parameters. There are valuable lessons for Australia to consider in any reform of its regulatory architecture.

3.1 National qualification frameworks are a global trend

In response to the need for lifelong learning and the realities of global labour migration, national qualifications frameworks are a fast-growing phenomenon throughout both the developed and developing world.

The European Centre for the Development of Vocational Training defines a qualifications framework as:

*'An instrument for the development and classification of qualifications (e.g. at national or sectoral level) according to a set of criteria (e.g. using descriptors) applicable to specified levels of learning outcomes.'*⁴⁵

Around 160 countries now have national qualifications frameworks. Some are mature, but most are still relatively young, having been developed in the last six years following the 2008 establishment of the European Qualifications Framework.⁴⁶ Uneven implementation largely reflects the staggered recognition of their importance as a key economic lever and the subsequent time needed to establish the architecture, adjust existing legal provisions and populate the framework.

Australia and New Zealand are considered pioneers in the field, having developed what were amongst the first frameworks in the world (in 1995 and 1991 respectively) and having established one of the very first regional frameworks, through the 1996 Trans-Tasman Mutual Recognition Agreement.

Most international national qualifications frameworks have a focus on learning outcomes: knowledge, skills and competence. And in most instances they encompass the qualification levels of all three sectors of education: school, vocational education and higher education.

For countries just starting to embrace the concept of national frameworks, the vocational sector is often the chosen starting point because of its capacity to contribute to policy goals and positively influence the productivity levels of a nation's workforce.

⁴⁵ European Centre for the Development of Vocational Training 2017

⁴⁶ European Quality Assurance in Vocational Education and Training 2008, viewed March 2017, <http://www.egavet.eu/gns/policy-context/european-vet-initiatives/european-qualifications-framework.aspx>.

Although there is no standard type of national qualifications framework, they typically share a common purpose, seeking to:

- ensure relativity between and consistency within qualification levels
- support lifelong learning by making learning pathways clearly visible
- strengthen the link between the education and training sector and the labour market
- promote learner and skilled worker mobility through effective skills recognition with other countries, and
- provide a reference point for quality assurance.

Most national qualifications frameworks have eight discrete qualification levels—although there are examples of frameworks with between six and 12 levels (including those of Australia and New Zealand, which both have ten levels).

Despite this diversity of approaches, taxonomies and national contexts, there is considerable consensus on how qualification frameworks based on learning outcomes are effective tools to raise skill levels, improve labour market productivity and contribute to sustainable development.⁴⁷

3.2 Specifying duration

In addition to assigning a framework level to a qualification, most national qualifications frameworks require the qualification developer⁴⁸ to assign a ‘credit value’ to each unit (set of learning outcomes) or module (component of a training program).⁴⁹ The end result of this approach is that in most countries, each individual qualification has a unique notional learning time.

This is in contrast to Australia’s approach—which applies a broad volume of learning indicator to an entire level of the Australian Qualifications Framework that, in turn, applies to all individual qualifications at that level.

⁴⁷United Nations Educational, Scientific and Cultural Organization Institute for Lifelong Learning 2015, *Global Inventory of Regional and National Qualifications Frameworks*, viewed March 2017, <http://www.uil.unesco.org/lifelong-learning/qualifications-frameworks/global-inventory-regional-and-national-qualifications>.

⁴⁸ Depending upon the country, the role of qualification developer may be limited to a small number of authorised bodies or may be open to any number of organisations subject to them meeting initial registration standards. Some nations also limit the number of bodies that develop a particular ‘type’ of product.

⁴⁹European Centre for the Development of Vocational Training 2008, *Terminology of European education and training policy: a selection of 100 key terms*, view March 2017, <http://www.cedefop.europa.eu/en/publications-and-resources/publications/4117>.

Similarly, Australia's *Standards for Training Packages 2012*, which give effect to the AQF in the development of training package qualifications, do not require credit points to be set at the unit of competency, skill set or qualification level. (However, as outlined in Chapter 2, accredited courses include a greater level of specification of duration.)

In the international models examined, credit values are usually expressed as a numerical value. Credit points are linked to notional learning time, with by far the most common approach being one credit point for every 10 hours of notional learning.

Credit value is used to:

- enable transparency to ensure prospective learners and their employers understand the relative weight of units and the notional learning hours required to achieve competency in the qualification, and
- develop arrangements that enable credit accumulation and transfer of learning outcomes between qualifications, education environments and countries.

In many instances, credit points are also used by individual training providers and governments to plan and allocate financial and human resourcing in accordance with the complexity of learning outcomes. That is, they are used as a guide by providers to understand the amount of training they need to deliver for a learner to achieve the learning outcomes specified in the qualification.

Some national qualifications frameworks assign both credit points and **actual hours** to individual qualifications.

Singapore's Workforce Skills Qualifications is its national credentialing system for training, assessing and certifying skills and competencies for the workforce. Qualifications are based on skills and competencies validated by employers, unions and professional bodies, and aligned to one of six qualification levels from certificate through to graduate diploma.

Qualifications are required to stipulate 'total training hours' which are typically expressed as a range with an upper and lower limit. Within each qualification, however, each 'competency module' is assigned a credit value with qualification rules stipulating the minimum number of credits needed to attain the full qualification.

New Zealand requires that all individual qualifications on the New Zealand Qualifications Framework must have a credit value 'which relates to the amount of learning in the qualification'. Ten notional learning hours are considered equivalent to one credit; each qualification level has a minimum credit size.

In determining the amount of learning in a qualification, the developer estimates how long it would typically take a person to achieve the stated outcomes in the specified context and to demonstrate that achievement through assessment. Notional learning hours include:

- direct contact time with teachers and trainers ('directed learning')
- time spent in studying, undertaking assignments and practical tasks ('self-directed'), and
- time spent in assessment.

A typical learner would usually complete 120 credits or 1200 hours of learning in a year.

England, which is part-way through major reform of what has been described as a complex and opaque vocational system that comprises more than 18,000 qualifications also provides greater specification of duration. A major component of the reform process is to make the hours required for each qualification explicit. Its Regulated Qualifications Framework was launched in October 2015 and requires all qualification developers to take a consistent approach to determining the level and describing the size of regulated qualifications.

In terms of qualification size, qualification developers must now assign two measures expressed in hours:

- Guided Learning Hours, which is the time spent actually being taught and is embedded within Total Qualification Time, and
- Total Qualification Time, which is an indication of how long a typical learner might take to complete a qualification. It includes Guided Learning Hours plus time for assessment plus individual study.

3.3 Definition of notional learning time

The precise definition of 'notional learning time' varies between international systems in terms of what is included and to what level it is specified. England, through its recent reforms, is introducing greater specificity into its arrangements.

In most systems, notional learning time incorporates all forms of *guided learning*, structured workplace experience and assessment. There is, however, significantly less consensus on the degree to which *unstructured learning* or the activities it comprises are part of notional learning time (Table 3).

Table 3: Examples of differing definitions of what is included in notional learning time

Country	Definition of notional learning time
England	<p>Uses the term total qualifications time (TQT) as an indication of how long a typical learner might take to study a qualification. It includes guided learning hours plus time for assessment plus individual study. 'Guided learning' means the time a person spends:</p> <ul style="list-style-type: none"> • being taught or given instruction by a lecturer, tutor, supervisor or other appropriate provider of education and training, or • otherwise participating in education or training under the immediate guidance or supervision of such a person.
Scotland	<p>Includes all the learning activities that are required to achieve the learning outcomes of the program, including those that take place before and after delivery as well as the actual delivery.</p>

Country	Definition of notional learning time
South Africa	<p>Comprises the total amount of time it would take an average learner to meet the outcomes defined in a learning experience and includes, inter alia:</p> <ul style="list-style-type: none"> • face-to face contact time • time spent in structured learning in the workplace • time for completing assignments and research, and • time spent in assessment processes.
New Zealand	<p>Includes:</p> <ul style="list-style-type: none"> • direct contact time with teachers and trainers ('directed learning') • time spent in studying, doing assignments, and undertaking practical tasks ('self-directed') • time spent in assessment.
Hong Kong	<p>Takes into account the total time likely to be spent by an average learner in all modes of learning, including:</p> <ul style="list-style-type: none"> • class attendance • online learning • practical learning • self-study • examinations and other assessment activities.

While most national qualification frameworks favour a broad definition for what is included in notional learning hours, the Scottish Credit and Qualifications Framework unpacks the definition using the following examples of what might be included:

'Activities before delivery might include:

- *preparation such as reading materials provided prior to delivery*
- *self-reflection on prior knowledge and experience and how it links to the delivery*
- *personal programme planning*
- *using libraries or learning resource centres for reading and research.*

Some of the more obvious activities for actual delivery are:

- *attending and participating in formal teaching sessions*

- *practical work in laboratories and other locations*
- *relevant Information Communication Technology (ICT) activities*
- *self-directed study using online or text-based open learning materials*
- *involvement in informal learning such as community groups, youth groups, outdoor activities.*

For after delivery, notional hours might include:

- *private study and revision*
- *reflection on what has been learned*
- *assessment of learning*
- *application of knowledge and understanding and skills within the workplace.*⁵⁰

Specifying some form of course volume or duration is generally regarded as a valuable input to guide qualification developers, training providers and users of the qualification, and it is a common feature of national qualification frameworks. In almost all instances, this is done by the individual qualification developer in accordance with the respective national qualification framework guidelines.

3.4 Other approaches to assuring quality of learning outcomes

What is clear from the review of other countries is the widespread use of external expertise during the assessment, validation or moderation process to regulate the quality of outcomes, in addition to requirements to specify duration of training programs. Through one mechanism or another, some externality is introduced to ensure learners are achieving the learning outcomes set down in the qualification.

Approaches include:

- External integrated summative assessment is used by countries such as Germany, where tripartite examination boards (comprising the employer, union and teacher) undertake assessment of students against the standards and this represents a key feature of the country's long established 'dual system'.
- External verification of assessment outcomes is approached differently by different systems. In Scotland, Credit Rating Bodies are responsible for monitoring the delivery and assessment of programs they have credit rated.
- External moderation is often used where national standards or national qualifications are in place to ensure assessment decisions are consistent across providers. Within New Zealand, Industry

⁵⁰ Scottish Credit and Qualifications Framework 2017, viewed March 2017, <http://scqf.org.uk/wp-content/uploads/2014/05/Notional-Learning-Hours-web-version-Feb-2012.pdf>.

Training Organisations manage the national external moderation of industry unit standards. All Tertiary Education Organisations (TEOs) with consent to assess against a standard must participate.

An overview of how some countries set qualification duration combined with quality assurance of outcomes is at Table 4.

Table 4: Overview of selected international approaches to duration and quality assurance

Country	Number of NQF levels	Metric for specifying volume and/or duration	Approach to specifying volume and/or duration	Authorised body which determines duration	Approach for assuring quality of learning outcomes
European Union	8	Credit points	Credit points linked to notional learning hours	Qualification developer	Varies between countries
New Zealand	10	Credit points	Credit points linked to notional learning hours	Qualification developer	Internal assessment External moderation
South Africa	10	Credit points	Credit points linked to notional learning hours	Qualification developer	External integrated summative assessment
Scotland	12	Credit points	Credit points linked to notional learning hours	Credit Rating Bodies	Internal assessment External verification
Singapore	6	Hours (full qual) Credit points (each competency module)	Total Training Hours (TTH) with an upper and lower limit	Qualification developer	Internal assessment Annual external audit including Evaluation of outcomes

Country	Number of NQF levels	Metric for specifying volume and/or duration	Approach to specifying volume and/or duration	Authorised body which determines duration	Approach for assuring quality of learning outcomes
England	8 (+ 3 entry levels)	Hours	Total Qualification Time within which is Guided Learning Hours	Qualification developer	Internal assessment External verification
Australia	10	Volume of learning indicators	Broad range of hours specified for each AQF level	Qualification developer	Internal assessment May be audited by regulator
Germany	8	Years Credit points	'Learning contract time' set for each qualification in years Converted into credits linked to notional learning hours	Qualification developer	External integrated summative assessment (nationally standardised)
Finland	8	Years Credit points	Credit points linked to years of study	Qualification developer	Tripartite assessment with final assessment by Qualification Committee

3.5 Ensuring an informed marketplace

In addition to facilitating credit accumulation and transfer, assigning a credit value to individual qualifications helps prospective learners and employers understand their relativity and the likely time involved in the learning and assessment process.

The value of such information has been recognised by the New Zealand Government. From late 2016, the New Zealand Tertiary Education Commission requires all Tertiary Education Organisations (TEOs) delivering qualifications at NZQF levels 5 and above (equivalent to diploma and above in Australia) to complete a 'key information set' for each qualification. This requires the TEO to state the program's duration, tuition fees, student success rates and minimum entry requirements. Made publicly available on each TEO's website, its goal is to provide a structured set of information that helps learners easily compare qualification information across tertiary providers.

3.6 Summary

The countries reviewed in this chapter all have a national qualifications framework in place that is based on a competency-based training system.

Other countries take a distinctly different approach from Australia to regulating the quality of VET outcomes by providing greater specification on the volume of learning or 'notional learning time' required for each individual qualification.

England has gone further and now requires stipulation of hours for each and every regulated qualification at two levels: the total qualification time and, as a subset, guided learning hours (which comprise a defined set of activities under direct instruction or supervision of a trainer).

In addition to an emphasis on input measures, many countries also have a strong focus on external expertise during the assessment or verification process (of student outcomes) or as part of moderation.

While Australia is in the rare position of not assigning nominal hours (except in relation to accredited courses) or credit points to individual qualifications, it also differs in how it approaches the quality of assessment. Unlike most comparable systems, Australia's VET system requires training providers to determine the appropriate amount of training without explicit guidance from the qualification developer and also allows the training provider to undertake assessment of its own learners.

While the Standards for RTOs strengthened the assessment requirements, both aspects essentially remain an internal RTO process and place significant responsibility on the VET regulators to detect poor-quality training and assessment.

Other initiatives that may be relevant to addressing the challenges facing the Australian VET system include New Zealand's introduction of mandatory information on duration (which must now be made available to their VET consumers in a standard, comparable format).

4. Analysis of advertising about course duration

This chapter outlines ASQA's review of advertisements for **training package** qualifications on the websites of ASQA-regulated RTOs. The data collected has been analysed to identify:

- whether course durations being advertised are within or below the volume of learning range set by the AQF for each qualification level (and if below, by how much), and
- whether short duration courses are prevalent in particular industry sectors, specific qualifications or qualification levels.

The information provides a comprehensive picture of the advertised duration of training package qualifications on ASQA-regulated RTO websites.

ASQA also considered the 2015 NCVET program enrolment data for ASQA-regulated RTOs in order to show the level of training activity associated with particular qualifications. If qualifications with large enrolment numbers have high rates of short duration courses, the impact of potential poor quality training outcomes is heightened.

The website review identified significant inconsistencies in the way information is presented for potential learners and industry. The value of course duration advertising to the overall VET consumer experience is also discussed in this chapter.

4.1 Approach to the advertising review

Between March and October 2015, ASQA reviewed RTOs' website advertising in relation to course duration; the project team reviewed 3087 RTO websites, providing a sample equivalent to 79 per cent of ASQA-regulated RTOs' websites.

The review found that 83 per cent of these websites contained course advertising and collected records of some form of course advertisement for 2551 RTOs.

Of the 2551 RTOs advertising training courses, 1892 RTOs advertised duration across a range of courses including training package qualifications, accredited courses, units of competencies and skill sets.

As the great majority of enrolments—around 77 per cent—are in training package qualifications, ASQA's analysis of advertised courses focused on training package qualifications.

The review identified 11,677 advertisements for training package qualifications delivered on a full-time basis across 1181 ASQA-regulated RTOs. Each advertisement is considered a 'record' for the purpose of this review.

The large sample collected provides meaningful information about advertised course duration. Enough data has been collected to support a high-level analysis of the patterns of duration that may indicate which training products are at a higher risk of being unduly short.

The website review collected information on:

- 1098 training package qualifications (that is, excluding units of competency or accredited courses)
- certificate I to advanced diploma–level qualifications (that is, excluding graduate diploma or graduate certificate qualifications, due to the small numbers of advertised courses), and
- courses advertised as full-time or not specified (that is, excluding part-time courses).

Where an RTO advertised the same course with different duration periods, the website review counted these as individual records.

4.2 What the Standards for RTOs say about advertising

The Standards for RTOs require RTOs to provide clear information, including information on course duration. Clauses 5.1 and 5.2 of the standards require that:

*'Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides, in print or through referral to an electronic copy, current and accurate information that enables the learner to make informed decisions about undertaking training with the RTO.'*⁵¹

While there is a requirement through the Standards for RTOs to provide information to learners and potential learners about courses, there is no requirement for them to **advertise** this information. Where RTOs choose to advertise course information, Clause 4.1 requires that the information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and:

i) does not guarantee that:

*ii) a training product can be completed in a manner which does not meet the requirements of Clause 1.1 and 1.2.*⁵²

Although not all RTOs advertise on their websites, where RTOs do advertise, these advertisements are required to offer accurate information about the RTO's courses. In relation to course duration, RTOs should not be advertising course durations which are inconsistent with the amount of training required by the relevant training packages.

⁵¹ Australian Government 2014, *Standards for Registered Training Organisations (RTOs) 2015*, viewed March 2017, <https://www.legislation.gov.au/Details/F2014L01377>.

⁵² Ibid.

4.3 Course duration advertisements and the VET consumer experience

The review found that the diversity of RTOs' advertising about course duration makes comparisons challenging and that some RTOs do not advertise course duration at all.

RTOs used a range of different terms to explain course duration to potential learners:

- Different measures of time were used—including hours, weeks, months and years—to express course duration.
- In some instances, what was advertised as duration was actually a period of access to course material. For example, some RTOs offering 'self-paced' delivery (which is often associated with online delivery) referred to duration as the period of time that a learner had to **access** course materials rather than to the duration of the structured program being provided.
- Many of the advertised courses involved a mix of delivery modes for the same course. The description of the delivery modes advertised by RTOs included:
 - > face to face
 - > online
 - > traineeship
 - > distance
 - > apprenticeship
 - > offshore
 - > self-paced, and
 - > fast-tracked.
- There was significant variation in the advertised course duration for the same qualifications offered by different RTOs.
- In some instances, an RTO advertised that the same course could be completed in different durations with the different duration resulting from the delivery mode.

The diversity displayed in course advertisements may reflect RTOs' flexible responses to learners' needs and study preferences. However, the significant variances between RTOs' advertised offerings—including a wide range of combinations of delivery modes; how RTOs determine course duration; and the terminology used to express course duration—makes direct comparison between courses challenging for prospective learners and industry.

This challenge is acknowledged across the VET sector. To assist consumers with course comparison, the Australian Government hosts the My Skills website—the national directory of VET organisations and

courses. It is designed to enable consumers to search for, and compare, VET courses and training providers.

My Skills includes course duration information that is voluntarily self-reported by RTOs. While this provides some information to consumers about the available offerings, its value is limited. Not all RTOs report duration, and where they do, it is not presented consistently in a way that enables comparisons to be made. Also absent is information about what industry regards as the appropriate duration of courses.

My Skills includes reference to the AQF volume of learning range as advice to consumers on the recommended duration. However, given the AQF's broad definition of training activity and broad range of duration, it is not clear how consumers could use this information to inform their judgements about the training courses on offer. Indeed, the average durations recorded on the My Skills website reflect similar variation of course duration to that documented by this strategic review, with a significant amount of training being offered with duration well below the AQF volume of learning range.

As noted in the *VET FEE-HELP Redesign Discussion Paper 2016*, the information available to support learners can be difficult to access:

'Students experience substantial challenges accessing suitable information regarding the cost, quality and reputation of VET FEE-HELP providers, particularly when seeking to compare and differentiate between the various courses and charging models among different providers. This is compounded by the lack of easily comparable information about student outcomes regarding completions and employment outcomes.'

*'While some information is available online regarding completion rates, tuition fees and other factors that are likely to influence student choice (including through My Skills), this data is spread across multiple websites and can be difficult to navigate. The lack of accessible information to support student choice reduces the incentive for providers to strive for, and increase, the quality of their performance. It is also arguably provides an incentive for unethical practices as students can be more easily confused with marketing claims that are not easily verified or challenged.'*⁵³

These concerns, while expressed in relation to VET FEE-HELP providers, apply more generally to all RTOs as documented by this review of RTO websites.

As outlined in Chapter 3, there are opportunities to consider approaches being taken to improve VET consumer information in other countries, particularly New Zealand's recent initiative. This matter is discussed further in Chapter 5.

⁵³ Australian Government, Department of Education and Training 2016, *Redesigning VET FEE HELP: Discussion Paper*, viewed March 2017, <https://docs.education.gov.au/documents/redesigning-vet-fee-help-discussion-paper>.

4.4 Enrolments in advertised courses

This section of the report analyses advertisements for training package qualifications that include course duration (for AQF qualification levels 1 to 6).⁵⁴

For each of these qualification levels, the analysis includes:

- the number of advertisements found, and
- the number of program enrolments at ASQA-registered RTOs.

Table 5 shows the distribution of the advertised durations that were reviewed by AQF level. It aligns this to:

- total 2015 program enrolments in the specific qualifications at the ASQA-registered RTOs that advertised the course durations, and
- total 2015 program enrolments in qualification levels delivered by the total number of ASQA registered RTOs.

The data shows that enrolments in the advertised qualifications represent 40 percent of all enrolments at ASQA-regulated RTOs in 2015. As a sample of total enrolments, this is significant and it enables the review to infer that the findings for a sample of this size are likely to apply across the market.

Table 5: Number of advertisements by training package qualification level and program enrolment

Qualification level	Number of advertisements specifying duration	Enrolments in courses with advertised duration	Total enrolments in all courses	Proportion of total students enrolled in course with advertised duration
Certificate I	197	42,074	116,866	36.0%
Certificate II	1091	114,518	463,911	24.7%
Certificate III	2989	346,200	879,596	39.4%
Certificate IV	3038	216,299	472,015	45.8%
Diploma	3523	267,793	534,651	50.1%

⁵⁴ Advertising data for graduate certificate and graduate diploma level qualifications are not included as the number of advertisements recorded was less than 20.

Qualification level	Number of advertisements specifying duration	Enrolments in courses with advertised duration	Total enrolments in all courses	Proportion of total students enrolled in course with advertised duration
Advanced Diploma	839	30,963	58,177	53.2%
Total	11,677	1,017,847	2,525,216	40.3%

Source: 2015 student enrolment numbers sources from NCVER (Australian vocational education and training statistics: total VET students and courses 2015)

4.5 Comparison of advertised durations with AQF volume of learning

To enable a comparison between the advertised course durations (largely expressed in weeks) with the AQF volume of learning range (expressed in hours), it is necessary to convert the AQF volume of learning range to weeks.

There are no commonly agreed definitions of either the hours for a full-time week of study or the length of the VET academic year. The analysis below is based on the assumption that 1200 hours or one year of full-time study is the equivalent of 34 weeks of full-time study per year, based on a weekly full-time study load of 35 hours per week.⁵⁵

The AQF Volume of Learning range, and its expression in weeks, is listed in Table 6.

⁵⁵ Advice to ASQA is there is no agreed definition of a full time year of study or a full time study load for a week. It was considered unlikely that an RTO would expect full time students to engage in learning (where learning encompasses both supervised and unsupervised study) for more than 35 hours per week so a study load of 35 hours has been assumed. A formula of 35 hours per week for a full time year of 34 weeks was therefore used to convert the AQF annual hours to weeks. This is consistent with the published calendars of a number of RTOs which tend to consist of 35 weeks of teaching and assessment in a year.

Table 6: AQF Volume of Learning Range in Weeks

Australian Qualifications Framework volume of learning indicators							
Certificate I	Certificate II	Certificate III	Certificate IV	Diploma	Advanced Diploma	Graduate Certificate	Graduate Diploma
0.5 – 1 year	0.5 – 1 year	1 – 2 years	0.5 – 2 years	1 -2 years	1.5 – 2 years	0.5 – 1 year	1 – 2 years
600 – 1200 hours	600 – 1200 hours	1200 – 2400 hours	600 – 2400 hours	1200 – 2400 hours	1800 – 2400 hours	600 – 1200 hours	1200 – 2400 hours
Converted to weeks							
17 – 34	17 – 34	34 – 68	17 – 68	34 – 68	51 – 68	17 – 34	34 – 68

Table 7 below shows by, AQF qualification levels, the advertised durations of courses the review found advertised on RTO websites. The table shows both:

- for each qualification level, the number of advertisements at a particular duration, and
- the number of these advertisements as a proportion of the total advertisements for that qualification level.

The shaded areas represent the AQF volume of learning range (from minimum to maximum) for each qualification level, expressed in weeks.

Advertised course duration that falls below the minimum of the AQF volume of learning range is shown to the left of the blue shaded boxes.

Table 7: Advertised course duration by AQF qualification level*

	ADVERTISED COURSE DURATION												Total records
	Less than 0.5 year		0.5 - year		Year to 1.5		1.5 - 2		Greater than 2				
	1-7 weeks	8-16 weeks	17-33 weeks	34-50 weeks	51-67 weeks	68 weeks and above							
Count	% of total	Count	% of total	Count	% of total	Count	% of total	Count	% of total	Count	% of total		
Certificate I	25	12.7%	44	22.3%	42	21.3%	27	13.7%	27	13.7%	32	16.2%	197
Certificate II	133	12.2%	220	20.2%	297	27.2%	43	3.9%	229	21.0%	169	15.5%	1091
Certificate III	128	4.3%	267	8.9%	849	28.4%	205	6.9%	729	24.4%	811	27.1%	2989
Certificate IV	194	6.4%	154	5.1%	913	30.1%	303	10.0%	961	31.6%	513	16.9%	3038
Diploma	52	1.5%	54	1.5%	746	21.2%	468	13.3%	1285	36.5%	918	26.1%	3523
Advanced Diploma	8	1.0%	5	0.6%	206	24.6%	104	12.4%	245	29.2%	271	32.3%	839
Total	540	4.6%	744	6.4%	3053	26.1%	1150	9.8%	3476	29.8%	2714	23.2%	11,677

* The AQF volume of learning range is highlighted in blue

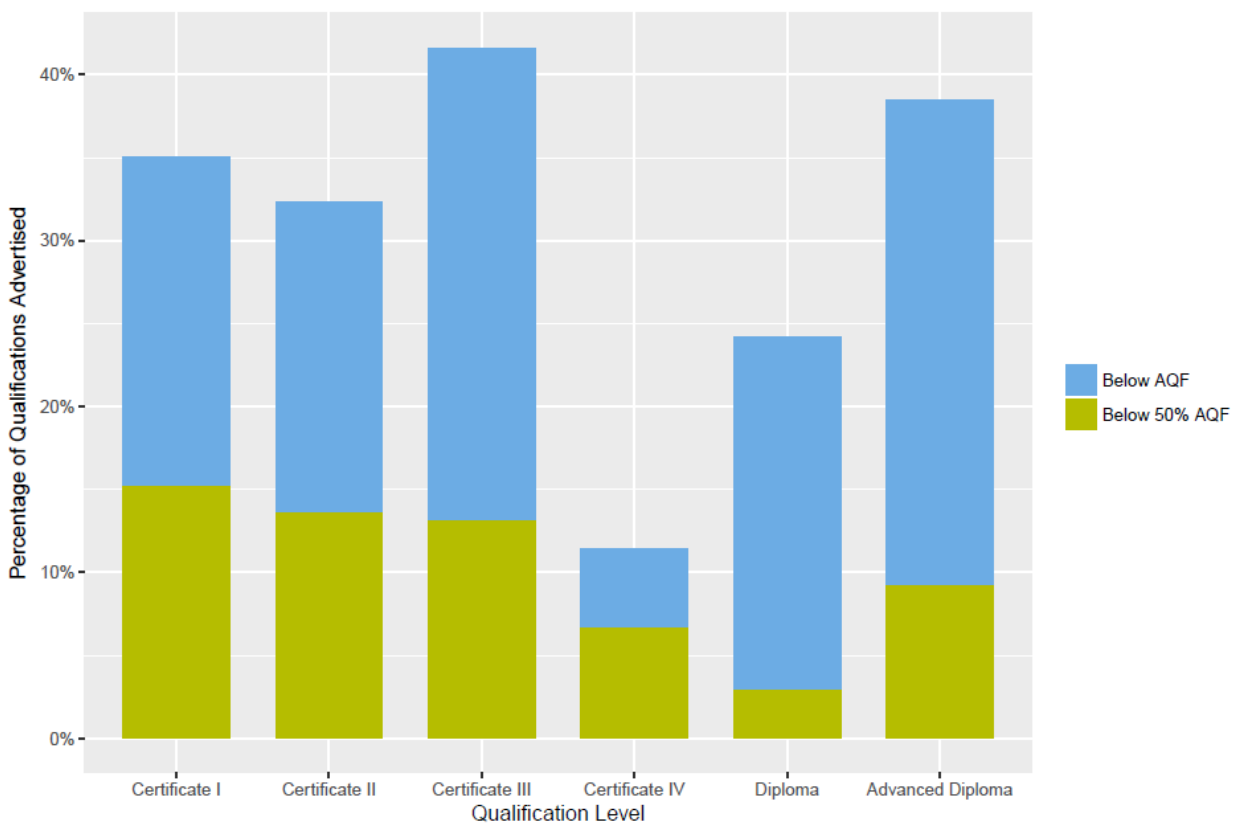
Across all qualification levels, ASQA found that:

- more than a quarter of courses were advertised with duration **less than the minimum** of the AQF volume of learning range, and
- eight per cent of courses were advertised with duration **less than half the minimum** of the AQF volume of learning range.

This review does not contend that all of the courses with an advertised duration below the minimum of the AQF volume of learning range are unduly short or of poor quality. As noted in Chapter 2, RTOs may have valid reasons for advertising and delivering courses with duration below the AQF volume of learning range. Given its regulatory experience to date, however, ASQA does contend there is a risk that a significant number of these advertisements will be the direct result of RTOs offering unduly short training. This is discussed further in Chapter 5.

The breakdown of the courses advertised below the minimum of the AQF volume of learning range is set out in Figure 6 below. It shows that Certificate III level qualifications have the highest proportion of advertised courses below the minimum of the AQF volume of learning range.

Figure 6: Percentage of courses advertised below the minimum of the AQF range by AQF levels



4.6 Course duration advertisements by AQF level

The following section of this report reviews advertisements by RTOs for each AQF level, and compares the advertised course durations to the AQF volume of learning range.

The level of risk indicated by the pattern of advertised course durations, specifically against the three risk factors below, is also discussed in this section.

In general, the level of risk will depend on a combination of factors, including:

- **the number of student enrolments**—which shows the market demand for the qualification, the size of the workforce, and therefore the scale on which industry and the community may be affected
- **the AQF level of the qualification**—which indicates the skills level that employers would legitimately expect an employee to have demonstrated in gaining their qualification
- **the nature of the industry involved**—workers in certain industries who have not been properly trained and assessed pose an elevated risk: for example, those who deal with vulnerable clients, issues of community safety or personal health and wellbeing.

This section discusses the AQF qualification levels according to the number of program enrolments—from the highest to lowest—as the number of enrolments is the key risk factor.

This section also identifies particular qualifications for which:

- ASQA found 20 or more courses advertised, and
- a high proportion of advertised course duration was below half of the minimum of the AQF volume of learning range.

The specific risks relevant to these qualifications are discussed.

The relevant tables also include:

- the program enrolments for each qualification type with an advertised duration
- the total program enrolments for each qualification type, and
- the proportion of total program enrolments included in the qualification with advertised duration.

Appendix D contains the full list of 422 training package qualifications (and the relevant program enrolment information) for which:

- there was an advertisement for a full-time course in 2015, and
- the project team was able to gather five or more advertisements.

Certificate III

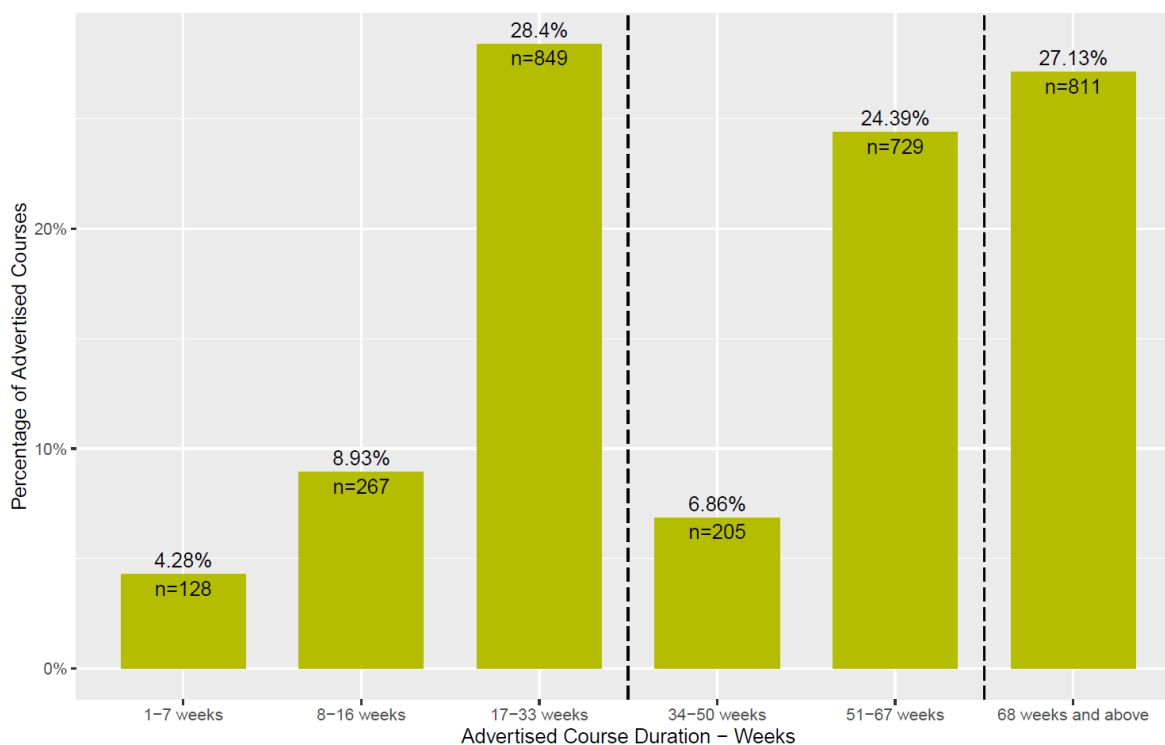
In 2015, there were 879,596 students enrolled in certificate III training package qualifications at ASQA-registered RTOs. This is equivalent to 34.8 per cent of the total enrolments in training package qualifications at ASQA-registered RTOs.

The AQF volume of learning range for the certificate III is one to two years (or 34 to 68 weeks). ASQA's website review found that of the 2989 certificate III qualifications advertised with course duration:

- 1244 courses, or more than 40 per cent, were advertised with course duration below the minimum of the AQF volume of learning range of 34 weeks, and
- 395 of these courses, or more than 13 per cent, were advertised with course duration below half of the minimum AQF volume of learning of 17 weeks.

Figure 7 shows the distribution of the advertised course duration for certificate III-level qualifications in weeks. The AQF volume of learning range is represented by the dotted lines.

Figure 7: Certificate III—advertised course duration in weeks



Certificate III training package qualifications are often required for entry-level positions in a range of industries. Many of these industries rely on the quality of the VET qualification as the basis for occupational

licensing.⁵⁶ Some states (Queensland and New South Wales) highlight the importance of school leavers gaining a post-school qualification through a certificate III.⁵⁷

At this level, employers rely on VET qualifications to ensure that new employees have the requisite competencies expected in these roles.

Employers would legitimately expect workers holding certificate III qualifications to:

- be work ready, and
- demonstrate an understanding of theory and practical knowledge in a specific vocational area.

A worker holding a certificate III would be required to apply their skills in a work environment and be familiar with this type of environment. They would be required to undertake work involving routine activities and some problem solving in familiar contexts.⁵⁸

Given their practical nature, many qualifications at this level are offered through apprenticeships or traineeships or include a work placement (for example, certificate III in early childhood education and care or individual support). Where these arrangements are in place, course duration tends to be longer (as outlined in section 4.7, which identifies qualifications where the advertised duration was within the AQF volume of learning range).

For the ten qualifications shown in Table 8:

- the website review found at least 20 advertisements showing course duration, and
- these qualifications had the highest proportion of advertisements showing a course duration of less than 17 weeks (which equates to 50 per cent of the AQF volume of learning minimum for a certificate III).

⁵⁶ Australian Skills Quality Authority 2017, 'Other licensing and registration requirements', web page, viewed March 2017 <https://www.asqa.gov.au/vet-registration/understand-requirements-registration/other-licensing-and-registration-requirements>.

⁵⁷ New South Wales Government 2017, Department of Industry, viewed March 2017, <https://www.training.nsw.gov.au/smartandskilled/>.

Queensland Government 2017, Department of Education and Training, viewed March 2017, <https://training.qld.gov.au/providers/funded/certificate3>.

⁵⁸ Australian Qualifications Framework Council 2013, *Australian Qualifications Framework Second Edition 2013*, p 12.

Table 8: Certificate III qualifications with the highest proportions of advertised course duration below 17 weeks

Code	Qualification Name	Advertised duration less than 17 weeks	Advertised duration less than 34 weeks	Number of ads	Enrolments in advertised courses*	Total enrolments in all courses*	Enrolment %
CPP30411	Certificate III in Security Operations	86.67%	90.00%	30	9686	12,740	76.03%
SIS30313	Certificate III in Fitness	31.58%	65.79%	76	20,468	30,163	67.86%
TLI31610	Certificate III in Warehousing Operations	30.00%	50.00%	30	9054	15,820	57.23%
CHC30212	Certificate III in Aged Care	29.63%	73.54%	189	24,497	47,208	51.89%
CHC30408	Certificate III in Disability	28.36%	65.67%	67	3417	7724	44.24%
HLT32512	Certificate III in Health Services Assistance	26.32%	86.84%	38	4511	12,622	35.74%
CHC30312	Certificate III in Home and Community Care	24.55%	71.82%	110	4975	11,277	44.12%
SIT30713	Certificate III in Hospitality	21.74%	55.43%	92	15,671	33,159	47.26%
BSB30115	Certificate III in Business	18.92%	67.57%	37	683	6500	10.51%
CHC30112	Certificate III in Community Services Work	16.28%	62.79%	43	1830	5842	31.32%

* *Enrolments in ASQA regulated RTOs*

A number of these qualifications—for example, aged care, fitness, hospitality, and business—are included in the 20 qualifications with the highest enrolment numbers across all AQF levels.

Some of the qualifications (such as those associated with aged care; home and community care; disability care; and health services) involve following health and legal protocols while working with challenging and vulnerable clients. Given that employers would have a legitimate expectation that these employees would be work ready, there are obvious ‘duty of care’ concerns relating to employees without the required competencies occupying these roles.

The demand for workers in these industries, and the complexity of their job roles, will continue to increase over time. Growth in dementia and other cognitive conditions has led to an increase in the complexity of clients that these workers are dealing with. Health and safety for both the worker and the client are important in these fields of work; this involves ensuring students learn and practice skills in manual

handling and infection control. Other studies have found that aged care short courses would not provide students with the necessary practice or the time to learn and absorb underpinning knowledge.⁵⁹

There may also be an emerging risk relating to the training required for workers in the disability sector with the roll out of the National Disability Insurance Scheme. Demand for workers with disability care qualifications is projected to grow significantly in coming decades.

The qualification for which there is the greatest proportion of very short duration courses, Certificate III in Security, was the subject of scrutiny in ASQA's strategic review into training for the security industry. Chapter 1 has referenced the review findings about the longstanding concerns of the serious risks of unduly short training in this industry (further detail is at Appendix A).

Given the both the high level of training activity in many of the qualifications in Table 8 and the potential for graduates of these qualifications to work with vulnerable clients, this is a cause for concern. If the high levels of advertised course duration below the AQF volume of learning requirements is not be supported by a valid pedagogical rationale (as required by the AQF), the impact on quality would be widespread.

Diploma

The diploma-level qualification had the second greatest number of enrolments in 2015 with 534,651 enrolments at ASQA-registered RTOs. This is equivalent to 21.2 per cent of the total enrolments in training package qualifications at ASQA-registered RTOs.

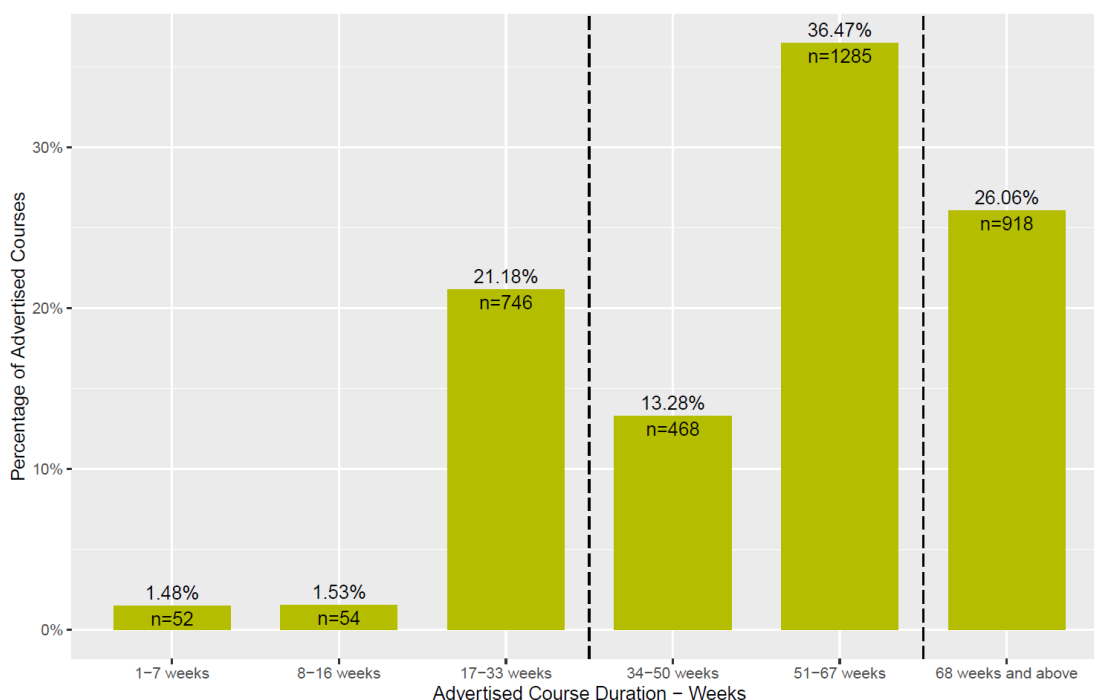
The AQF volume of learning range for the diploma is one to two years (or 34 to 68 weeks). ASQA's review found that of the 3523 diploma qualifications advertised with course duration:

- 852 courses, or more than 24 per cent, were advertised with a course duration below the minimum of the AQF volume of learning range of 34 weeks, and
- 106 of these courses, or three per cent, were advertised with course duration below half of the minimum of the AQF volume of learning range of 17 weeks.

Figure 8 shows the distribution of the advertised course duration for diploma-level qualifications in weeks. The AQF volume of learning range is represented by the dotted lines.

⁵⁹ Misko et al 2014, *Quality assessments: practice and perspectives*, National Centre for Vocational Education Research.

Figure 8: Diploma—advertised course duration in weeks



The risk posed by the level of advertised course duration below the minimum of the AQF volume of learning range may also be significant for some diploma-level qualifications.

As a general rule, employers would legitimately expect workers holding diploma-level qualifications to be able to ‘undertake advanced skilled or paraprofessional work.’⁶⁰ This work would involve applying knowledge and technical skills to analyse information, address complex problems and show initiative in the workplace. Diploma-level qualifications are designed as suitable for coordination and supervisory roles in the workplace⁶¹ and are often used by those in the workplace to gain promotion or work at a higher level.⁶²

For those VET graduates proceeding to higher education, the diploma may be used for credit transfer purposes to a university degree. The quality of the VET qualification is important for student success when used as a pathway to higher education.

⁶⁰ Australian Qualifications Framework Council 2013, *Australian Qualifications Framework Second Edition 2013*, p 15.

⁶¹ This is reflected in diplomas in fields such as business, work, health and safety, project management, vocational education and training, early childhood education and many others.

⁶² Moodie, G. et al 2013, *Vocational education’s variable links to vocations*, National Centre for Vocational Education Research, viewed March 2017, <https://www.ncver.edu.au/publications/publications/all-publications/vocational-educations-variable-links-to-vocations>.

In addition, graduates would be expected to apply knowledge and skills to demonstrate autonomy, judgement and defined responsibility in known or changing contexts and within broad but established parameters.⁶³

Table 9 shows the diploma-level training package qualifications that the review has identified as being of particular concern.

For the ten qualifications shown in Table 9:

- the website review found at least 20 advertisements showing course duration, and
- these qualifications had the highest proportion of advertisements showing a course duration of less than 17 weeks (which equates to 50 per cent of the AQF volume of learning minimum for a diploma).

Table 9: Diploma qualifications with the highest proportions of advertised course duration below 17 weeks

Code	Qualification Name	Advertised duration less than 17 weeks	Advertised duration less than 34 weeks	Number of ads	Enrolments in advertised courses*	Total enrolments in all courses*	Enrolment %
BSB51312	Diploma of Work Health and Safety	26.47%	58.82%	34	1082	2566	42.17%
BSB51315	Diploma of Work Health and Safety	19.23%	34.62%	26	683	1373	49.75%
TAE50111	Diploma of Vocational Education and Training	16.28%	32.56%	43	1468	2059	71.30%
BSB51413	Diploma of Project Management	13.24%	35.29%	68	4800	10,374	46.27%
BSB51415	Diploma of Project Management	11.43%	42.86%	35	2995	6065	49.38%
SIS50213	Diploma of Fitness	10.34%	34.48%	29	1052	1436	73.26%
BSB50615	Diploma of Human Resources Management	9.52%	19.05%	21	310	3420	9.06%
BSB50415	Diploma of Business Administration	8.70%	43.48%	23	689	5233	13.17%

⁶³ Australian Qualifications Framework Council 2013, *Australian Qualifications Framework Second Edition 2013*, p 15.

Code	Qualification Name	Advertised duration less than 17 weeks	Advertised duration less than 34 weeks	Number of ads	Enrolments in advertised courses*	Total enrolments in all courses*	Enrolment %
TAE50211	Diploma of Training Design and Development	6.06%	24.24%	33	998	1575	63.37%
BSB51107	Diploma of Management	4.12%	45.00%	340	38,011	59,541	63.84%

** Enrolments in ASQA regulated RTOs*

The top three qualifications in Table 9 carry significant risk if there is unduly short training due to the nature of the industries and job roles. The first two relate to job roles responsible for health and safety in workplaces and the third relates to the quality of vocational education and training.

The issue of short duration training and assessment qualifications, given their significance to the entire VET system, is discussed in detail in section 4.8.

Certificate IV

The certificate IV had the third greatest number of enrolments of all VET courses in 2015, with 472,015 enrolments at ASQA regulated RTOs. This is equivalent to 18.7 per cent of the total enrolments in training package qualifications at ASQA-registered RTOs.

The AQF volume of learning range for the certificate IV is half a year to two years (or 17 to 68 weeks). ASQA's review found that of the 3038 certificate IV qualifications advertised with course duration:

- 348 courses, or more than 11 per cent, were advertised with course duration below the minimum of the AQF volume of learning range of 17 weeks, and
- 194 of these courses, or over six per cent, were advertised with course duration below half of the minimum of the AQF volume of learning range of eight weeks.

Determining the proportion of certificate IV qualifications being delivered below the minimum of the AQF volume of learning range is complicated by the nature of the certificate IV qualification. The AQF states that the volume of learning of a certificate IV is typically half a year to two years but notes there may be variations between:

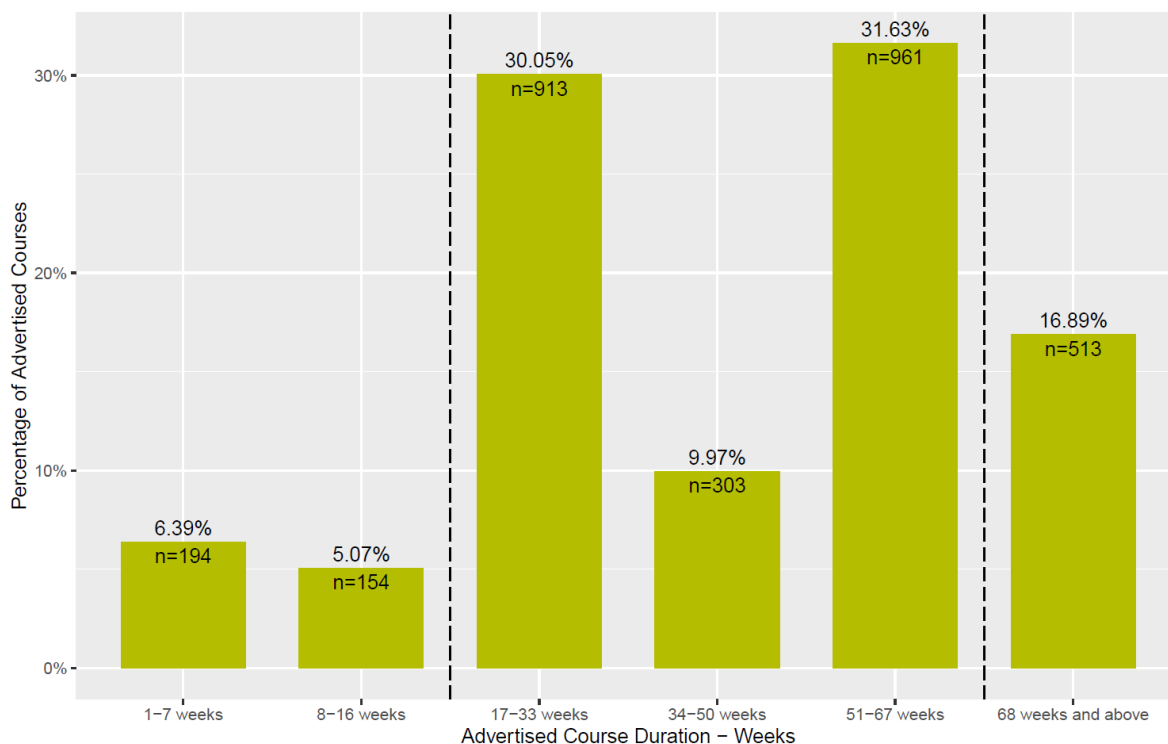
- short-duration specialist qualifications that build on knowledge and skills already acquired, and

- longer duration qualifications that are designed as entry-level requirements for work.⁶⁴

The fact that the certificate IV covers two distinct types of training courses—one aimed at new learners that would be expected to be delivered over a longer period at the higher end of the AQF volume of learning range, and the other which is seen as a ‘top up’ course which could legitimately be delivered over a shorter period—makes analysis of this qualification level fraught.

Figure 9 shows the distribution of the advertised course duration for certificate IV qualifications in weeks. The AQF volume of learning range is represented by the dotted lines.


Figure 9: Certificate IV—advertised course duration in weeks



The risk posed by unduly short training at the certificate IV level is significant, based on employers’ expectations of skill levels and the numbers of students studying at this level.

In the education and health sectors, certificate IV qualifications provide entry-level qualifications for jobs where workers have significant responsibilities and where there is significant job growth. These include roles such as VET trainer and assessor; allied health assistant; health technician; Aboriginal and/or Torres Strait Islander health worker; and home sustainability assessment worker.

⁶⁴ Australian Qualifications Framework Council 2013, *Australian Qualifications Framework Second Edition 2013*.



Some occupations require a certificate IV for licensing or registration purposes—for example, those in fields such as aviation; nursing; building and construction; real estate; property; and financial services.⁶⁵ In some fields of study (such as education) certificate IV qualifications are used for articulation to higher education. Certificate IV qualifications can also be an entry requirement for a diploma in the same area.

Employers would expect graduates of a certificate IV qualification to:

- have some specialised skills, or a broad range of skills
- be able to complete routine and non-routine tasks, and
- provide ideas and solutions to workplace problems.⁶⁶

Certificate IV graduates can have some responsibility for others and, in rural areas, can assume supervisor roles. Generally, graduates at this level would apply knowledge and skills to demonstrate autonomy, judgement and limited responsibility in known or changing contexts and within established parameters.

For the ten qualifications shown in Table 10:

- the website review found at least 20 advertisements showing course duration, and
- these qualifications had the highest proportion of advertisements showing a course duration of less than eight weeks (which equates to 50 per cent of the AQF volume of learning minimum for a certificate IV).

⁶⁵ Australian Skills Quality Authority 2017, viewed March 2017, <https://www.asqa.gov.au/vet-registration/understand-requirements-registration/other-licensing-and-registration-requirements>.


⁶⁶ Australian Qualifications Framework Council 2013, *Australian Qualifications Framework Second Edition 2013*, p 12.

Table 10: Certificate IV Qualifications with the highest proportions of advertised course duration below eight weeks

Code	Qualification Name	Advertised duration less than 8 weeks	Advertised duration less than 17 weeks	Number of ads	Enrolments in advertised courses*	Total enrolments in all courses*	Enrolment %
TAE40110	Certificate IV in Training and Assessment	31.32%	46.70%	182	32,502	53,748	60.47%
BSB41412	Certificate IV in Work Health and Safety	28.77%	35.62%	73	4252	12,949	32.84%
BSB41415	Certificate IV in Work Health and Safety	19.05%	21.43%	42	1890	3798	49.76%
BSB41513	Certificate IV in Project Management Practice	17.14%	25.71%	35	1198	3647	32.85%
BSB40407	Certificate IV in Small Business Management	12.07%	20.69%	58	1925	10,493	18.35%
BSB42015	Certificate IV In Leadership and Management	9.09%	13.64%	22	869	3280	26.49%
BSB40507	Certificate IV in Business Administration	8.57%	8.57%	70	2595	7475	34.72%
SIS40210	Certificate IV in Fitness	8.11%	29.73%	74	16,628	19,544	85.08%
BSB40812	Certificate IV in Frontline Management	5.81%	11.61%	155	12,031	24,281	49.55%
FNS40211	Certificate IV in Bookkeeping	5.0%	10.0%	40	3226	8098	39.84%

* Enrolments in ASQA regulated RTOs

A number of the certificate IV qualifications shown in Table 10 are among the top twenty qualifications (across all AQF levels) in terms of size of enrolments: training and assessment; frontline management; building and construction; and fitness.



This suggests that there is a high level of demand from students and industry for these qualifications. Therefore, if the high rates of short duration courses being advertised are indicative of high rates of unduly short training, the negative impact on the quality of learning outcomes and confidence in the sector is significant.

The results of the analysis of course duration advertisements in relation to the Certificate IV in Training and Assessment are of particular concern given their critical impact on the quality of the sector as a whole. Given the special nature of this qualification, it is discussed in more detail in section 4.7 of this chapter.

Certificate II

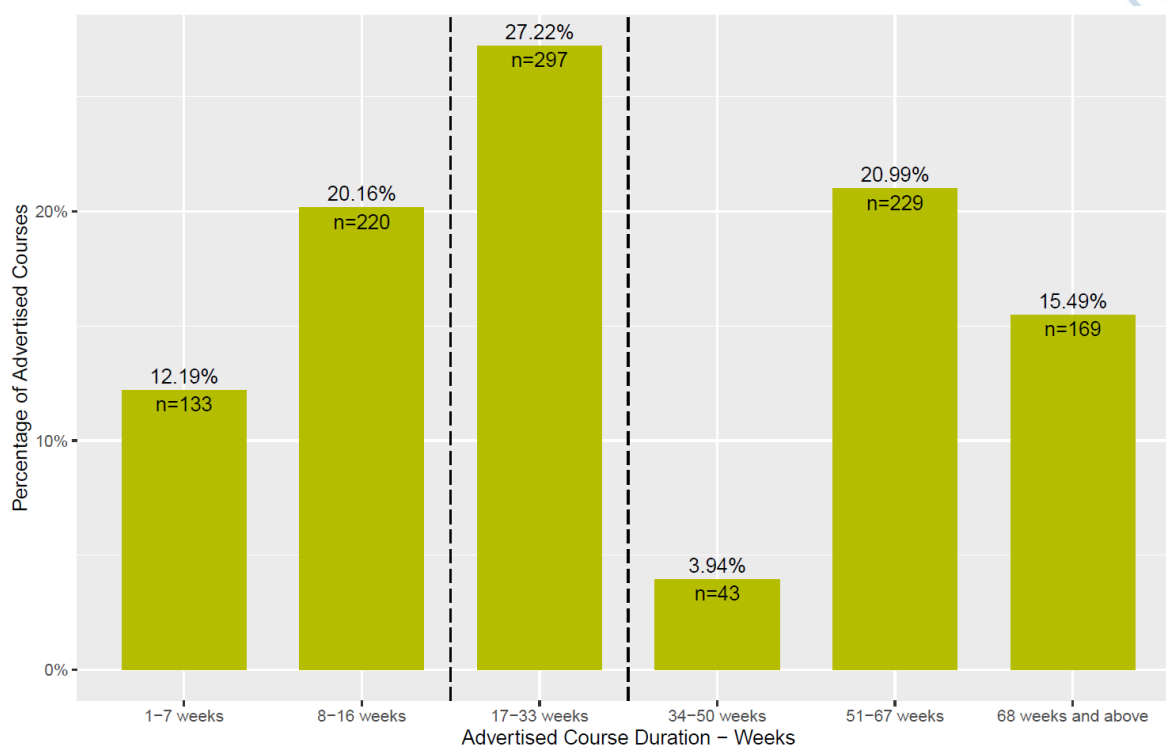
Certificate II-level qualifications had a significant number of student enrolments in 2015 with 463,911 students undertaking a qualification at this level at ASQA-registered RTOs. This is equivalent to 18.4 per cent of the total enrolments in training package qualifications at ASQA-registered RTOs.

The AQF volume of learning range for the certificate II is a half year to one year (or 17 to 34 weeks). ASQA's review found that of the 1091 certificate II qualifications advertised with course duration:

- 353 courses, or more than 32 per cent, were advertised with course duration below the minimum of the AQF volume of learning range of 17 weeks, and
- 133 of these courses, or more than 12 per cent, were advertised with course duration below half of the minimum of the AQF volume of learning range of eight weeks.

Figure 10 shows the distribution of the advertised course duration for certificate II in weeks. The AQF volume of learning range is represented by the dotted lines.

Figure 10: Certificate II—advertised course duration in weeks




Certificate II is typically considered a 'foundation' program, in which the entrant is required to undertake preparation before embarking on the demands of a higher level qualification (such as a certificate III) in a specific vocational area. As a pre-apprenticeship course, a certificate II can be a requirement for attaining an apprenticeship; they are also typically used for VET in schools qualifications.

When the certificate II was first introduced, the aim was to provide a lower level qualification to 'develop basic vocational skills and knowledge leading to employment (generally at lower skill level positions), and for those already employed, possibly some career advancement-related benefits.'⁶⁷

In recent years, a certificate II has been increasingly used to provide a pathway to further study by providing basic skills (such as literacy and numeracy) or language skills (English as an additional language) that can help learners get a job or develop the capabilities to undertake further study.

Certificate II's have been used successfully to retrain retrenched workers by upgrading skills and addressing language, literacy and numeracy.⁶⁸

⁶⁷ Stanwick J 2005, *Australian Qualifications Framework lower-level Qualifications: Pathways to where for young people?* National Centre for Vocational Education Research, p 8.



Lower level VET qualifications such as certificate II also serve a purpose by providing an entry point into VET for various groups who experience disadvantage including:

- non-English speaking students
- people living in remote and very remote Australia
- people in lower socioeconomic groups, and
- indigenous Australians.⁶⁹

The AQF qualification descriptor states that a certificate II ‘qualifies individuals to undertake mainly routine work and as a pathway to further learning’.⁷⁰

Graduates with this qualification would have little autonomy in the workplace and would typically work in a team environment. They would use a limited range of equipment to complete tasks and act on a defined amount of information in a defined area of work.

Table 11 shows the certificate II training package qualifications that the review has identified as being of particular concern. For the ten qualifications shown in Table 11:

- the website review found at least 20 advertisements showing course duration, and
- these qualifications had the highest proportion of advertisements showing a course duration of less than eight weeks (which equates to 50 per cent of the AQF volume of learning minimum for a certificate II).

⁶⁸ Beddie, F 2015, *The outcomes of education and training: what the research is telling us 2011–14*, National Centre for Vocational Education Research 2015, viewed March 2017, <https://www.ncver.edu.au/about/news-and-events/insight-newsletter/insight-issue-55/the-outcomes-of-education-and-training-what-the-research-is-telling-us-2011-14>.

⁶⁹ Shah, C et al 2015 *Role of lower-level qualifications in Australia’s vocational education and training system*, Centre for Economics of Educations and Training, Faculty of Education, Monash University, viewed March 2017, <http://arrow.monash.edu.au/vital/access/manager/Repository/monash:153057>


⁷⁰ Australian Qualifications Framework Council 2013, *Australian Qualifications Framework Second Edition 2013*, p. 14.

Table 11: Certificate II qualifications with the highest proportions of advertised course duration below eight weeks

Code	Qualification Name	Advertised duration less than 8 weeks	Advertised duration less than 17 weeks	Number of ads	Enrolments in advertised courses*	Total enrolments*	Enrolment %
CPP20212	Certificate II in Security Operations	100.00%	100.00%	31	14,204	18,342	77.44%
SIT20213	Certificate II in Hospitality	20.29%	36.23%	69	8407	45,114	18.64%
SIR20212	Certificate II in Retail Services	19.44%	25.00%	36	4099	22,610	18.13%
SIT20112	Certificate II in Tourism	19.05%	33.33%	21	2861	6126	46.70%
BSB20112	Certificate II in Business	10.67%	24.00%	75	6067	32,678	18.57%
SIB20210	Certificate II in Nail Technology	10.53%	21.05%	38	908	2832	32.06%
SIB20110	Certificate II in Retail Make-Up and skin care	9.76%	31.71%	41	1981	6488	30.53%
SIH20111	Certificate II in Hairdressing	6.00%	52.00%	50	1641	5565	29.49%
SIT20312	Certificate II in Kitchen Operations	4.65%	27.91%	43	3986	31,239	12.76%
UEE22011	Certificate II in Electrotechnology (Career Start)	4.35%	73.91%	23	2152	7497	28.70%

* *Enrolments in ASQA regulated RTOs*

The data above in relation to the Certificate II in Security Operations (the entry level qualification for security work) confirms what has already been identified as a longstanding risk in the VET sector and in the wider community given the nature of these job roles. ASQA's previous review into security training in



Australia has found that concerns about unduly short training and poor-quality learning outcomes were pervasive and give rise to significant public safety risks.

In addition, as mentioned above, a certificate II often provides a foundation in basic language and numeracy. Certificate II courses also prepare educationally disadvantaged cohorts and school students to undertake further VET qualifications. Unduly short courses could set them up to fail.

Certificate I

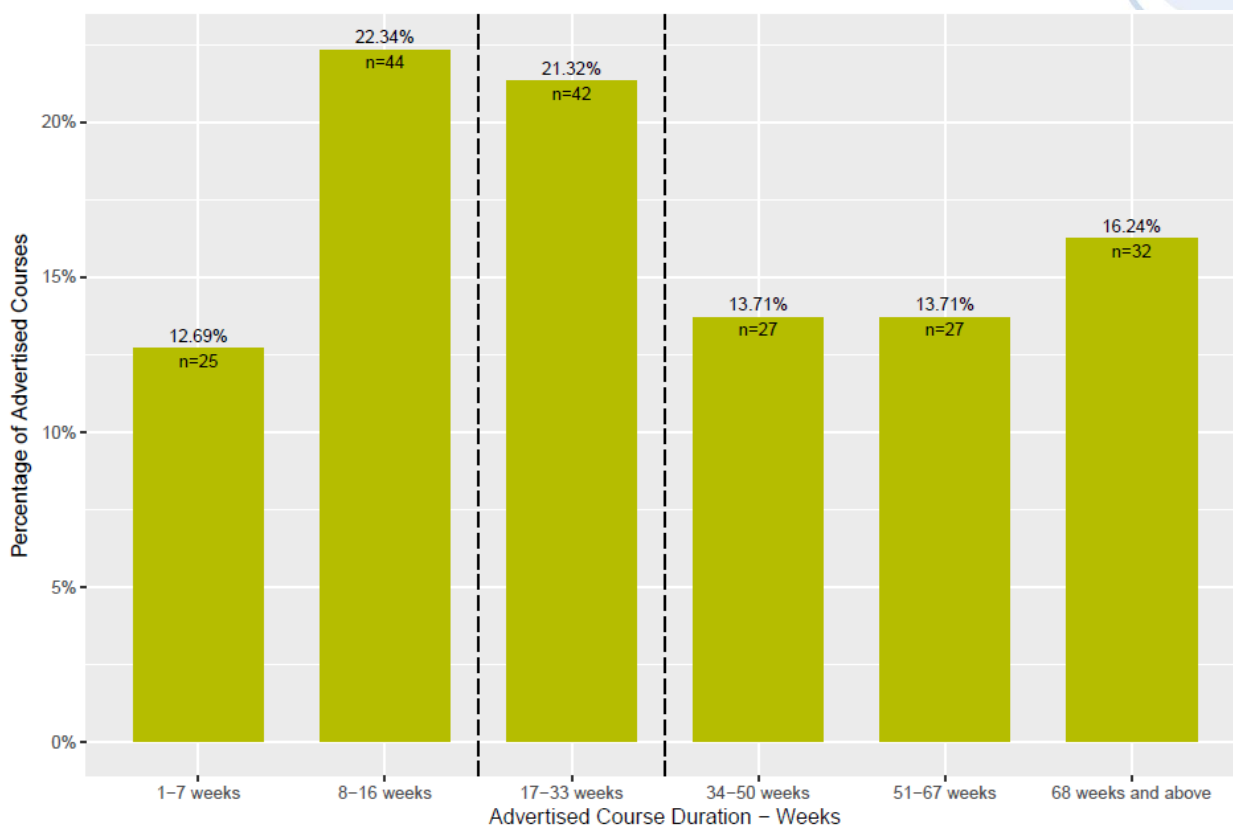
There were 116,866 student enrolments at the certificate I level at ASQA-registered RTOs in 2015. This is equivalent to 4.6 per cent of the total enrolments in training package qualifications at ASQA-registered RTOs.

The AQF volume of learning range for the certificate I is a half year to one year (or 17 to 34 weeks). ASQA's review found that of the 197 certificate I qualifications advertised with course duration:

- 69 courses, or 35 per cent, were advertised with course duration below the minimum of the AQF volume of learning range of 17 weeks, and
- 25 of these courses, or more than 12 per cent, were advertised with course duration below half of the minimum of the AQF volume of learning range of eight weeks.

Figure 11 shows the distribution of the advertised course duration for certificate I in weeks. The AQF volume of learning range is represented by the dotted lines.

Figure 11: Certificate I—advertised course duration in weeks



Certificate I is typically considered a ‘foundation’ program, in which the entrant is required to undertake preparation before embarking on the demands of a higher level qualification, such as a certificate III, in a specific vocational area. As a pre-apprenticeship course, a certificate I can be a requirement for attaining an apprenticeship; they are also typically used for VET in schools qualifications.

Because this cohort of learners may include vulnerable or disadvantaged learners with a high need for additional learning support, unduly short training can have a significant long term impact.

Table 12 shows the certificate I training package qualifications that the review has identified as being of particular concern. There were two certificate I qualifications as shown in Table 12 for which:

- the website review found at least 20 advertisements showing course duration, and
- these qualifications had the highest proportion of advertisements showing a course duration of less than eight weeks (which equates to 50 per cent of the AQF volume of learning minimum for a certificate I).

Table 12: Certificate I qualifications with the highest proportions of advertised course duration below eight weeks

Code	Qualification name	Advertised duration less than 8 weeks	Advertised duration less than 17 weeks	Number of ads	Enrolments in advertised courses*	Total Enrolments in all courses*	Enrolment %
CPC10111	Certificate I in Construction	11.11%	40.74%	27	30,022	41,926	71.61%
ICA10111	Certificate I in Information, Digital Media and Technology	9.52%	38.10%	21	3,055	15,375	19.87%

The Certificate I in Construction is of particular concern, given the number of enrolments. The qualification is likely used as an ‘industry taster’ to enable students to gain a basic understanding of the industry sector and to enable them to decide whether this is an area in which they wish to pursue a career. Very short duration courses are less likely to offer students the level of knowledge and understanding they need to make informed choices about their career path.

Advanced diploma

There were 58,177 students undertaking an advanced diploma–level qualification ASQA-registered RTOs in 2015. This is equivalent to 2.3 per cent of the total enrolments in training package qualifications at ASQA-registered RTOs.

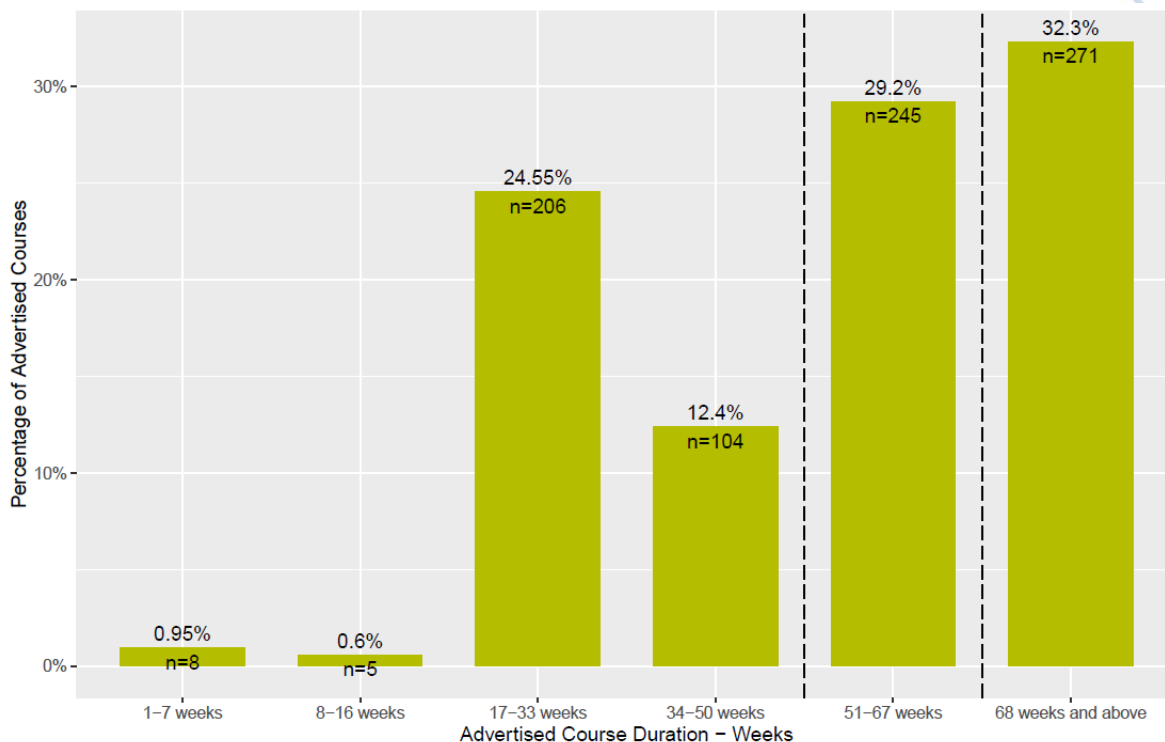
The AQF volume of learning range for the advanced diploma is one and a half years to two years (or 51 to 68 weeks). ASQA’s website review found that of the 839 advanced diploma qualifications advertised with course duration:

- 323 courses, or more than 38 per cent, were advertised with course duration below the minimum of the AQF volume of learning range 51 weeks, and
- 78 of these courses, or more than nine per cent, were advertised with course duration below half of the minimum of the AQF volume of learning range of 26 weeks.

Assessing risk in relation to this cohort of learners is challenging. It is possible this cohort includes a large number of existing workers who are upskilling and who have existing recognisable skills and experience, thus providing a valid pedagogical rationale for some shorter duration courses, as permitted by the AQF.

Figure 12 shows the distribution of the advertised course duration for the advanced diploma in weeks. The AQF volume of learning range is represented by the dotted lines.

Figure 12: Advanced diploma—advertised course duration in weeks



ASQA has determined that unduly short training at the advanced diploma level may also be a concern for certain qualifications, based on employers' expectations of graduates' skill levels.

Advanced diploma-level qualifications are designed as suitable for specialised and/or paraprofessional skill roles in the workplace.⁷¹ For VET graduates proceeding to higher education, the advanced diploma is used for credit transfer to a university degree. The quality of the VET qualification is important for student success when used as a pathway to higher education.

As a general rule, employers would legitimately expect a worker holding an advanced diploma to:

- have the cognitive and communication skills to formulate answers to complex problems, and
- be able to transfer knowledge and skills to others.⁷²

⁷¹ This is reflected in advanced diplomas in fields such as business, work, health and safety, project management, vocational education and training, early childhood education and many others.

⁷² Australian Qualifications Framework Council 2013, *Australian Qualifications Framework Second Edition 2013*, p 15.

Table 13 shows the advanced diploma–level training package qualifications that the review has identified as being of particular concern. For the nine qualifications shown in Table 13:

- the website review found at least 20 advertisements showing course duration, and
- these qualifications had the highest proportion of advertisements showing a course duration of less than 25 weeks (which equates to 50 per cent of the AQF volume of learning minimum for an advanced diploma).

Table 13: Advanced diploma qualifications with the highest proportions of advertised course duration below 25 weeks

Code	Qualification name	Advertised duration less than 25 weeks	Advertised duration less than 51 weeks	Number of ads	Enrolments in advertised courses*	Total enrolments in all courses*	Enrolment %
BSB60707	Advanced Diploma of Project Management	26.92%	38.46%	26	144	311	46.30%
FNS60210	Advanced Diploma of Accounting	18.87%	64.15%	53	1166	2257	51.66%
BSB60515	Advanced Diploma of Marketing	18.18%	40.91%	22	142	785	18.09%
BSB60407	Advanced Diploma of Management	14.94%	54.55%	154	5698	8600	66.26%
BSB60507	Advanced Diploma of Marketing	10.53%	65.79%	38	1528	2552	59.87%
BSB60207	Advanced Diploma of Business	9.52%	66.67%	63	1821	3133	58.12%
CUF60107	Advanced Diploma of Screen and Media	3.85%	15.38%	26	690	927	74.43%
SIT60313	Advanced Diploma of Hospitality	3.51%	10.53%	57	2048	4016	51.00%
BSB60215	Advanced Diploma of Business	3.45%	31.03%	29	186	764	24.35%

* Enrolments in ASQA-regulated RTOs

4.7 The special case of the Certificate IV in Training and Assessment

The Training and Education (TAE) Training Package plays a critical role in assuring quality in the VET sector. The Certificate IV in Training and Assessment is the minimum qualification required for teachers and trainers to deliver and assess nationally recognised VET qualifications.

The size of the workforce as well as the role played by the qualification magnifies its impact. The Productivity Commission estimated that in 2011 approximately 73,000 people were employed in vocational education and training by public providers and 150,000 by the private sector.⁷³ In 2015, 53,748 people were enrolled in the Certificate IV in Training and Assessment, making this the third-largest course in the VET sector.⁷⁴

The importance of TAE graduates to the broader Australian workforce was described by Skills Australia in 2011:

*'... TAE graduates hold a central and unique place in the VET sector. They are responsible for training much of Australia's workforce (and for supervising others who do so) and the quality of their work directly affects the credibility of Australia's nationally recognised qualifications.'*⁷⁵

Despite the recognition of this critical role, serious concerns about poor-quality delivery of the TAE training products have persisted for several years. Skills Australia cited the results of audits of 24 RTOs delivering the precursor to the current Certificate IV that were conducted in 2010 by the Western Australian Training Accreditation Council. These audits found 50 per cent of those RTOs were not compliant. In particular, the RTOs' learning and assessment strategies were significantly inadequate.

ASQA's strategic reviews into training in the early childhood education and care, aged care and security industries have advocated strongly for improvements to the Certificate IV in Training and Assessment—to ensure that people who are responsible for training and assessing others have sound training and assessment skills so that they can fully and properly assess learner competence.

Where TAE qualifications are awarded inappropriately, this has a compounding effect on the quality of delivery and assessment for all vocational training in Australia. As set out in Chapter 2, Australia's VET regulatory framework requires RTOs and their staff to exercise professional judgement in designing their training and assessment to meet the training package and accredited course requirements. Thus the quality of the TAE qualifications held by these staff members is crucial to RTOs making sound judgements.

⁷³ Australian Government, Productivity Commission 2011, *Vocational education and training workforce—research report*.

⁷⁴ Ibid.

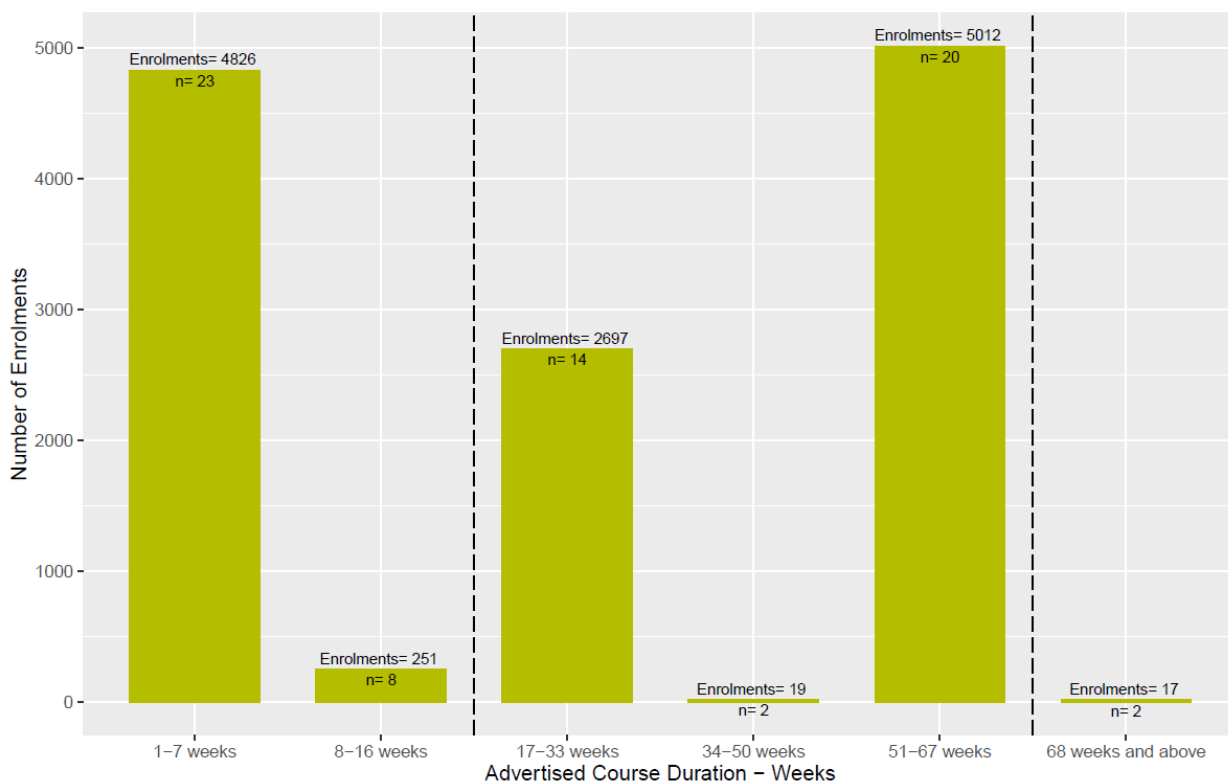
⁷⁵ Skills Australia 2011, *Skills for prosperity—a roadmap for vocational education and training*, viewed March 2017, <https://docs.education.gov.au/system/files/doc/other/skillsprosperityroadmap-2011.pdf>

Where practitioners themselves have participated in unduly short training, there is an obvious risk that these practitioners will not have sufficient understanding of how to establish an appropriate amount of training for each product.

ASQA’s website review revealed that 47 per cent of RTOs with the qualification on their scope of registration advertise it with course duration of seventeen weeks or less and 31 per cent of RTOs advertised course duration of less than eight weeks.

Figure 13 shows the distribution of the advertised course duration for the TAE40110 in weeks. The AQF volume of learning range is represented by the dotted lines.

Figure 13: TAE40110 Certificate IV in Training and Assessment (with enrolments)



ASQA also holds concerns about advertised duration for the Diploma of Vocational Education and Training. ASQA’s website review revealed that 32.6 per cent of RTOs with the qualification on scope advertise it with course duration of thirty-four weeks or less and 16.3 per cent of RTOs advertised course duration of less than seventeen weeks.

ASQA has responded to these concerns by initiating a strategic risk project focused on the TAE training package, as set out in the case study below. A replacement TAE training package was endorsed in February 2016. The project is seeking to use the transition to the new TAE qualification as an opportunity to ensure that only quality providers are approved to deliver the new qualification.

Case study—training and education qualifications

A replacement TAE Training Package was endorsed in February 2016. Enhancements to the certificate IV qualification include a mandatory unit on designing and developing assessment tools, and a requirement for independent validation of the RTO's assessment system, tools, processes and outcomes. The addition of the unit *TAEASS502 Design and develop assessment tools* is particularly important, as it will ensure that trainers and assessors have a greater depth of knowledge about good assessment practice and that students graduating from VET courses are more effectively assessed.

ASQA holds significant concerns in relation to the delivery of the current TAE training products in a very short timeframe, where it is likely the unduly short training provides inadequate time for development of the required skills. Given the key role that practitioners play in the quality of training, and the unacceptable levels of non-compliance with Standard 1 of the Standards for RTOs, ASQA's *Regulatory Strategy 2016–17* prioritised the 'capability of trainers and assessors' as one of its three target areas. As of 2016, ASQA began applying additional regulatory scrutiny to RTOs seeking to deliver the revised TAE training products.

The TAE Training Package Implementation Project ensures that only quality providers are approved to have the new TAE qualifications on their scope of registration.

A targeted regulatory strategy for the assessment and approval of each application involves:

- stronger application evidence requirements
- more scrutiny for identified providers of concern—identified through analysis of comprehensive data, including their compliance, complaint and audit history
- conducting evidence reviews for identified providers of concern, including reviewing completed student assessments for the superseded *TAE40110 Certificate IV in Training and Assessment*, and
- conducting audits of providers outside the providers of concern group where evidence provided with the application identifies concerns about the intended strategies for training and assessment.

This additional regulatory scrutiny of TAE providers alone cannot fully address the risks of unduly short training across the system. Chapter 5 proposes better specifying the duration of this essential qualification as one component of a recommended strategy to support more effective regulation and greater transparency for industry and learners.

4.8 Advertised duration within the AQF volume of learning range

ASQA's website review also found advertised training package qualifications for which duration was within the AQF volume of learning range.

This section lists those training package qualifications that had the highest proportion of advertised courses with duration meeting or exceeding the minimum of the AQF volume of learning range for that qualification level.⁷⁶

Certificate III


The AQF volume of learning range for certificate III qualifications is between one and two years (or between 34 and 68 weeks). The advertised certificate III qualifications in Table 14 were nearly all within this range.

Table 14: Certificate III qualification with highest proportion of advertised duration above the minimum of the AQF volume of learning range

Code	Qualification name	Duration advertised below 17 weeks	Duration advertised below 34 weeks	Number of ads	Enrolments in advertised courses*	Total enrolments in all courses*	Enrolment %
AUR30612	Certificate III in Light Vehicle Mechanical Technology	0.00%	0.00%	53	6931	14,053	49.32%
MEM30205	Certificate III in Engineering - Mechanical Trade	0.00%	0.00%	25	3953	8528	46.35%
MEM30305	Certificate III in Engineering - Fabrication Trade	0.00%	0.00%	37	4551	10,015	45.44%
SIH30111	Certificate III in Hairdressing	0.00%	4.76%	84	7364	12840	57.35%
SIT31113	Certificate III in Patisserie	0.00%	6.25%	32	1164	2204	52.81%

*Enrolments in ASQA-regulated RTOs

⁷⁶ For which the website review found at least 20 advertisements showing course duration.



The AQF notes that up to four years may be required to achieve the learning outcomes through a program of indentured training/employment (also known as an apprenticeship or traineeship). This explains why some qualifications shown in table 14 were advertised with longer course duration.

For example, the Australian Apprenticeships and Traineeships Information Service shows that the current qualification, Certificate III in Light Vehicle Mechanical Technology (AUR30616) is available as an apprenticeship in all jurisdictions with a nominal duration of 48 months.

As outlined in Chapter 2, which highlights the various ways that duration is regulated in Australia's competency-based training system, nominal durations still influence course durations in qualifications undertaken through an apprenticeship pathway, despite competency-based progression. Qualifications that are undertaken through a declared apprenticeship pathway with a nominal duration therefore may have less risk of being delivered in unduly short times.

Diploma

The AQF volume of learning range for diploma-level qualifications is between one and two years (or between 34 and 68 weeks). The review found that the course durations advertised for diploma-level qualifications shown in Table 15 were nearly all within this range.

The nursing and building and construction qualifications are both requirements for occupational licences; as such, the duration of the training is likely to reflect the requirements imposed through these licensing regimes.

The other qualifications shown in table 15 relate to specialised fields in the creative industries and are delivered by a small number of RTOs with small enrolment numbers. It is possible that in a small specialised and niche training and job market, consumers are better informed about the composition and duration of the courses.

Table 15: Diploma qualifications with the highest proportions of advertised course duration above the minimum of the AQF volume of learning range

Code	Qualification name	Advertised duration below 17 weeks	Advertised duration below 34 weeks	Number of ads	Enrolments in advertised courses*	Total enrolments in all courses*	Enrolment %
CUV50111	Diploma of Visual Arts	0.00%	0.00%	21	535	1384	38.66%
CPC50210	Diploma of Building and Construction (Building)	0.00%	0.00%	21	4795	12,540	38.24%
LMT50307	Diploma of Applied Fashion Design and Technology	0.00%	0.00%	20	484	1179	41.05%
HLT51612	Diploma of Nursing (Enrolled-Division 2 nursing)	0.00%	1.76%	58	12,615	22,624	55.76%
CUS50109	Diploma of Music	0.00%	4.17%	24	414	718	57.66 %


**Enrolments in ASQA-regulated RTOs*

The fact that some training package qualifications are being advertised with course duration that meets the AQF volume of learning requirements indicates that the risk of unduly short training is not universal. This has been an important consideration in formulating a proposed response to the risk of unduly short training. This is discussed further in Chapter 5.

4.9 Summary

This website review collected information on 11,677 advertisements showing course duration for 1098 training package qualifications across all qualification levels (certificate 1 to advanced diploma) and types advertised by 1181 ASQA-regulated RTOs between March and October 2015.

The review has found significant inconsistency in how RTOs advertise course duration—including different terminology, meanings of duration, and measures of time. This is likely to be confusing for industry and learners trying to choose the most appropriate course. In particular, this lack of consistency makes any direct comparison between courses challenging, as there is significant variation in the advertised course duration of the same qualifications offered by different RTOs.



The review found that more than a quarter of courses were advertising a duration **of less than the minimum of the AQF volume of learning range**. Almost eight per cent of the courses reviewed were advertised with duration of **less than half the of the minimum AQF volume of learning range**.

Within each AQF level, the review identified those qualifications with the highest rates of advertised short duration and highlighted those for which the impact of unduly short training could have the greatest impact.

The impact is likely to be greater for those qualifications:

- with the highest enrolment numbers (indicating market demand and breadth of risk if graduates are not adequately trained)
- needed to skill workers in growth industries
- offered to disadvantaged learners, and
- required for job roles with vulnerable clients or with implications for community or workplace health and safety.

This chapter has also highlighted the special case of the Certificate IV in Training and Assessment (TAE40110), which plays a central role as the key qualification for teachers and trainers in the VET system. The review found the TAE40110 to be Certificate IV qualification with the highest proportion of advertised course durations of less than 50 per cent of the AQF volume of learning range minimum. This presents a key risk factor for entire VET system as poor quality delivery of the TAE has a compounding effect on the quality of delivery and assessment for all vocational training in Australia.

The findings point to the need to introduce additional measures to address the significant levels of short duration courses in certain industry sectors, a percentage of which are almost certainly providing what ASQA describes in this report as 'unduly' short training.

The review also found that a number of qualifications had high rates of advertised course duration that meet the AQF volume of learning requirements. These qualifications tend to be delivered through apprenticeship or traineeship pathways or be the subject of separate regulation outside of VET, for example through occupational licensing, as discussed in Chapter 2.

The results of the website review show which training package qualifications are at greatest risk of being delivered in an unduly short time. Chapter 5 sets out a proposed response that is proportionate to this risk.

5. Findings and recommendations

Research, stakeholder reports and several of ASQA's previous strategic reviews have shown that courses of very short duration are widespread, cutting across industry sectors and qualifications.

ASQA's view is that many of these short duration courses offer 'unduly short training': situations in which an RTO delivers an insufficient amount of training for a learner to acquire the skills and knowledge specified in a unit of competency, skill set or qualification.

If this practice is left to continue it will lead to loss of confidence in the VET system and long-term costs to industry, individuals, the community and governments.

ASQA initiated this strategic review into unduly short training to examine the issue in more depth and identify systemic solutions.

5.1 RTOs are advertising large numbers of very short duration courses

ASQA does not contend that all courses of short duration are of poor quality. It is acknowledged that there can be legitimate reasons for courses being shorter than the AQF volume of learning and that this flexibility is an important principle of Australia's competency-based training system.

However, based on its regulatory experience and the findings of previous reviews, ASQA is concerned by the prevalence of advertising of short training courses. ASQA's concerns centre on the resulting risk of qualifications being awarded on the basis of an amount of training insufficient for a learner to have gained and demonstrated the necessary competencies.

The review considered more than 11,500 RTO advertisements showing duration for full-time courses. The advertisements analysed covered more than 1000 training package qualifications⁷⁷ offered by almost 1,200 ASQA-regulated RTOs. ASQA's analysis found:

- more than a quarter advertised a duration **less than the AQF volume of learning minimum**, and
- eight per cent advertised a duration **less than half the AQF volume of learning minimum**.

This pattern was evident to varying degrees across all qualification levels in Australian VET.

The level of risk posed by unduly short training increases where there is a correlation between short duration and high enrolment numbers. As certificate III and diploma courses are the most widely utilised Australian VET qualifications, the impact of unduly short training is potentially significant.

⁷⁷ As outlined in chapter 4, given that the great majority of VET enrolments (77 per cent) are in training package qualifications, ASQA's analysis of advertised courses focused on training package qualifications.

This review has found that:

- Where duration was advertised for certificate III courses, 41.6 per cent of courses were advertised to take less than the one to two years volume of learning required by the AQF for a certificate III course.
- For diplomas, almost a quarter of courses advertised with duration fell below the one to two year AQF volume of learning for diploma courses.
- The AQF volume of learning for advanced diplomas is 18 months to two years; 38.6 per cent of courses advertised with duration were advertised as taking less than 18 months.
- Certificate I and II courses have an AQF volume of learning of six months to one year, and 35.0 per cent and 32.4 per cent of Certificate I and II courses respectively were advertised with times of less than six months.
- Short courses were less prevalent at the certificate IV level. Eleven and half per cent of such courses were advertised with duration of less than 6 months. However, the findings of the course duration advertising analysis in relation to certificate IV qualifications are challenging to extrapolate (given that the volume of learning range is broad at six months to two years).

The analysis of the qualification levels revealed that there were particular industry qualifications showing a high proportion of courses with advertised duration below the AQF minimum.

One of the highest risk qualifications—in terms of its breadth of impact—was found to have the highest rates of short duration courses. More than 30 per cent of the advertised Certificate IV in Training and Assessment courses (the qualification required for all VET trainers and assessors) included duration of less than *a half of the minimum* AQF volume of learning. This is of major concern, as it potentially affects the quality of training and assessment received by every learner in the VET system.

In addition to the Training and Education training package, other industry sectors where a significant proportion of training package qualifications were advertised with duration of less than *half of the minimum* AQF volume of learning were security operations; work health & safety; warehousing operations, fitness; aged care; and disability. The Certificate III in Early Childhood and Care was also identified as a concern with a high proportion of advertisements showing duration under AQF volume of learning minimum.

Previous ASQA reviews have already documented the prevalence of short duration training in the construction; security; early childhood education and care; and aged and community care industries. In these industries, graduates who are not competent for their job roles can increase the risks to public safety or to vulnerable clients. This review found high levels of advertised short course duration for these industry qualifications, indicating that short duration courses remains an ongoing concern.

Similar concerns arise about the risks of unduly short training for job roles involving work health and safety and caring for clients with a disability.

5.2 The impact of unduly short training is serious

Stakeholders in this review—as well as previous ASQA reviews—have reported that the impact of unduly short training is far-reaching, with significant consequences for learners, employers, RTOs, the community more broadly, and governments:

- **For learners**, the impact of unduly short training can be significant if their qualifications are not deemed credible by employers and they are judged as not holding the skills and competencies specified in their qualification. Not only is there a financial impact for the learner paying (or having expended their individual training entitlement) for poor-quality training, they may also experience forgone income and long-term loss of confidence.
- **For employers**, unduly short training poses an immediate risk to the enterprise and a longer term, risk to industry by workers who are credentialed but not actually sufficiently skilled or competent, impacting on productivity; and/or work health and safety and client outcomes. Some employers have commented on the need to retrain new employees on the job, incurring additional costs, or have established their own enterprise registered training organisations to avoid this risk.
- **For RTOs**, there are risks to both reputation and commercial viability, where unduly short training can create an unsustainable 'race to the bottom'. Over time, this can drive RTOs to compromise their standards (in order to remain viable) or to exit the marketplace altogether. RTOs who want to invest in high-quality programs that have sufficient time to enable learners to gain all of the required skills and competencies are facing unfair competition because of the increasing prevalence of short courses being offered in the VET market.
- **For many industries**, the increasing numbers of workers who are not competent in the qualifications they hold perpetuates real skills shortages and impacts on productivity. Where other regulators are concerned by short duration training, red tape can be imposed as these industry-specific agencies put their own additional mechanisms in place to assure the competence of VET graduates.
- **For the community**, the quality of services and products that the community relies on may be compromised. Where graduates who are not properly trained work with vulnerable clients or have important roles in public safety there can be significant risks to the general community.
- **For governments**, unduly short training poses a strategic risk to the human capital of Australia, to training as an export industry, and the confidence of industry and the community in the value of VET qualifications. It can also mean that governments do not receive value for money for their significant investment in VET.

5.3 The regulatory framework for duration is complex and confusing

The regulatory framework for duration enshrines the concept of competency-based training—but in a manner that is complex and confusing for the RTOs to interpret and difficult for regulators to effectively determine compliance.

The AQF, which sets the overarching framework for duration:

- is necessarily broad in order to serve all industry and education sectors and to recognise that learners can achieve competence in different timeframes
- expresses volume of learning as a range that applies across entire qualification levels
- includes both RTO-supervised and individual-directed learning activities without guidance about how much volume should be allocated to each type of activity, and
- does not provide sufficient guidance to RTOs, learners or regulators about the expected volume of learning for units of competency, in which there is a significant and growing number of enrolments.

Research has shown that other countries with competency-based training systems have greater specification of the volume of learning or 'notional learning time' required for each individual qualification. England now requires stipulation of hours for every regulated qualification at two levels: the total qualification time and, as a subset, guided learning hours, which comprise defined activities under the direct instruction or supervision of a trainer.

The *Standards for Training Packages 2012* do not allow training packages to specify the volume of learning that RTOs must deliver, nor any other delivery requirements. This is in contrast to the *Standards for Accredited Courses 2012*, which require inclusion of nominal hours and nominal duration. The fact that two types of nationally recognised training products have different duration requirements compounds the complexity of the regulatory framework.

The Standards for RTOs require RTOs to provide an amount of training consistent with the requirements of the qualifications (training packages and VET accredited courses) they deliver, but do not define 'amount of training'.

The flexibility inherent in the AQF volume of learning requirements and the Standards for RTOs allows RTOs to deliver training that caters specifically to learners' individual needs. It therefore requires RTOs to exercise significant professional judgement in interpreting the requirements of the training package to determine an appropriate amount of training. ASQA is then responsible for ensuring the compliance of RTOs against these requirements by exercising its own professional judgement.

However, the lack of specification is increasing the risk of poor-quality training, where a number of factors are driving short duration courses:

- a **highly competitive marketplace**, where a shorter duration is often marketed as an RTO's primary point of difference with unscrupulous providers willing to respond to demand for unduly short training and more reputable providers forced to compete or to exit the market
- pressure to respond to **learner and/or employer demand** for duration to be reduced for qualifications required as the basis of gaining or maintaining employment, and
- **poor-quality assessment practices** and **inadequate trainer and assessor competencies** as identified in ASQA's previous strategic reviews.

ASQA's research for this review found that many other countries include independent review of student outcomes, as well as duration, as part of their quality frameworks. In contrast, Australia leaves both these aspects as essentially internal RTO processes. This makes the Australian system especially vulnerable to the risk that insufficient training due to short duration is not detected through assessment processes.

At worst, the flexibility in the regulatory framework allows for providers to assert that the apparent short duration of their courses relates only to the RTO supervised learner activity and if learner-directed activities (private study) is included, the duration meets the requirements.

ASQA's experience in auditing RTOs supports the finding that the current framework is at best confusing and at worst allowing loopholes for unscrupulous providers. Between April 2015 and March 2017, almost half of the ASQA audits conducted that assessed the amount of training provided found non-compliance with this requirement at the initial audit.

5.4 A myriad of ad hoc duration arrangements have evolved

The review has found that although the Australian system is based on the attainment of competence, a myriad of different and somewhat ad hoc duration requirements have been set outside the VET Quality Framework affect RTO delivery.

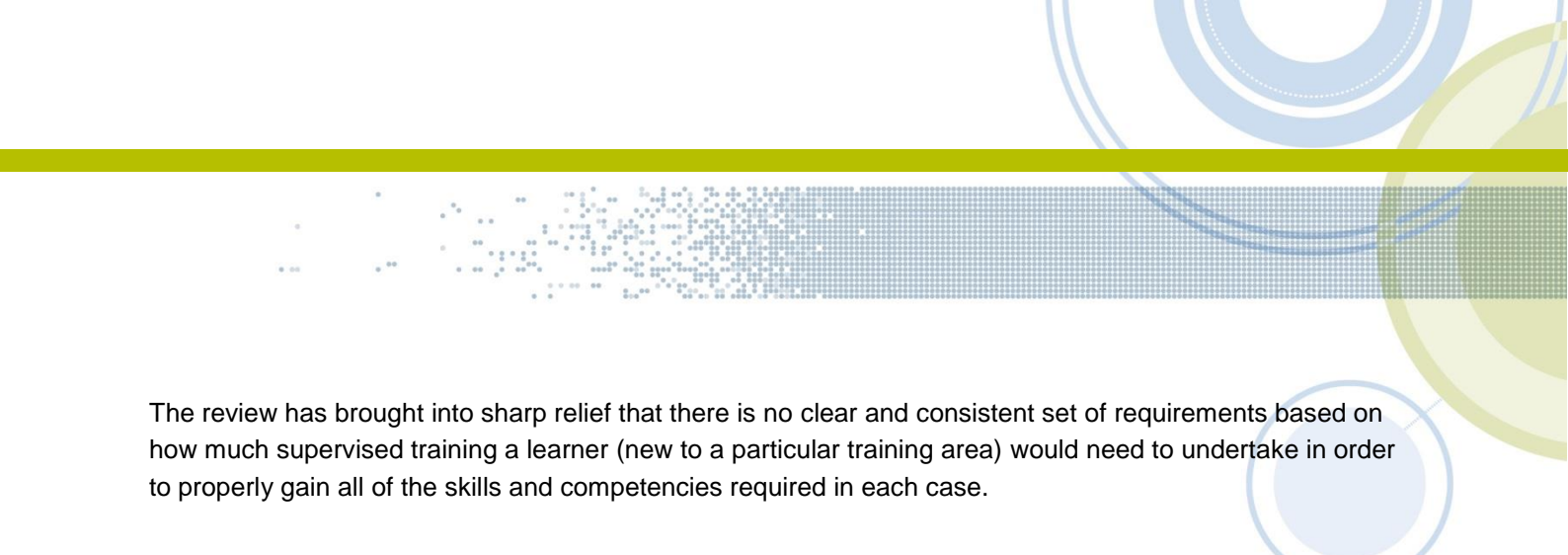
These are set by different agencies for various purposes including recording and reporting national training activity; planning delivery and funding of training; and declaring nominal durations for qualifications undertaken through apprenticeships or traineeships. Some of these vary across jurisdictions, adding a layer of complexity for industry and learners. These requirements suggest that duration does matter, even in a competency-based training system.

Outside of the VET system, some occupational regulators impose mandated course durations as a way of addressing their concerns about the quality of training delivery. The additional requirements set by occupational regulators can vary across the country.

In its recent report on training in the security industry, ASQA found that for five different licensed security occupations, there were 40 sets of differing requirements for the licences, even though mutual recognition of such licences is in place. This means that no two jurisdictions have exactly the same requirements to obtain a security industry licence in any given security occupation. Moreover, some licensing authorities have set mandatory training times for RTOs in their jurisdiction for their training to be valid for licensing purposes, while others have not.

Where these licences are captured by mutual recognition provisions, this can drive significant distortions to the training market, as learners actively gravitate to the licensing regime applying the least additional regulation. RTOs can seek to exploit these complex arrangements by providing low-quality training, which then erodes the credibility of the VET and licensing regimes.

The impact of this complexity is significant, creating inefficient and overlapping regulation that results in administrative burden and confusion for industry, employers and learners. The situation is counterproductive from the point of view of developing a consistent national set of parameters to promote high-quality training.



The review has brought into sharp relief that there is no clear and consistent set of requirements based on how much supervised training a learner (new to a particular training area) would need to undertake in order to properly gain all of the skills and competencies required in each case.

5.5 Poor consumer information does not support informed choices

An effective marketplace for any product or service requires the two pillars of adequate choice and well informed consumers. There has been much public commentary on whether Australia has the latter. ASQA's 2013 strategic review into the marketing and advertising practices of RTOs painted a concerning picture.⁷⁸ Up to 45 per cent of RTOs were found to be marketing and advertising misleading information; more than 53 per cent of the RTO websites that were reviewed marketed unrealistically short programs. These findings have been reinforced by the results of ASQA's review of RTO websites undertaken for this strategic review.

Potential Australian VET students face considerable difficulties in accessing usable information to enable them to choose an appropriate training provider—that is, a training provider that will provide them with high-quality training leading to good job outcomes at a reasonable price. Employers face the same challenges.

Despite Australia's VET market including more than 4600 training providers, this competition is not driving quality upwards because consumers do not have sufficient information with which to make informed choices.

The review has found significant inconsistency in how RTOs advertise course duration including different terminology, meanings of duration, and measures of time. There is no guidance provided to RTOs about what form their advertising or marketing should take.

There is significant variation in the advertised course duration of the same qualifications offered by different RTOs, making any direct comparison between courses challenging for industry and learners. For instance, more than 40 per cent of certificate III courses take less than 34 weeks, while over a quarter of them take 68 weeks or more. In the case of diploma qualifications, almost one quarter of them are gained through courses advertised to take less than 34 weeks, while more than one quarter were advertised to take 68 weeks or more.

The Standards for RTOs have significantly tightened requirements around the marketing and advertising of training to potential learners and employers. However, RTOs have no obligation to advertise the amount of training required for the attainment of a qualification. The Standards for RTOs require only that if they do so, they must not make misleading statements (for example, claiming a qualification takes two weeks to complete when learners typically complete over a period of several months). There is also no obligation for

⁷⁸Australian Skills Quality Authority 2013, *Marketing and advertising practices of Australia's registered training organisations*.

an RTO's marketing to make clear the typical training and assessment pathway that applies to a qualification.

The Standards for RTOs also require RTOs to make certain information, including estimated duration, available to potential learners. While this information is to be made available in print or through electronic copies, there is no requirement for consistent terminology or format is to be used.

One tool to assist consumers with course comparison is the My Skills website hosted by the Australian Government. My Skills is the national directory of VET organisations and courses designed to enable consumers to search for, and compare, VET courses and training providers. However, RTOs are able to opt into stating their course times on My Skills, and this course time is based on the RTO's decision about how long their course is, rather than on any consistent benchmarks or how long a quality course (for a learner new to the training area) might need to take. Because the system is optional and not widely used by RTOs, there is clearly room to improve this resource to provide consumers in the VET market with adequate information that would enable them to choose quality training.

5.6 Other quality concerns

ASQA recognises that in addition to course duration there are other issues affecting the quality of training outcomes. Often these quality concerns are interrelated and there is a need for complementary measures to address their impact in a holistic manner. For example, ASQA's regulatory work has found that the quality of assessment continues to pose a significant challenge for RTOs and there are high rates of non-compliance with the relevant Standard.

In September 2015, Senator the Hon. Simon Birmingham, the-then Assistant Minister for Education and Training, established the Training and Assessment Working Group to develop reform options to improve the quality of assessment in VET in consultation with stakeholders. The working group consisted of representatives from industry and the VET sector. ASQA was represented on this working group and contributed to the development of these recommendations. The recommendations of the Training and Assessment Working Group are available at: www.education.gov.au/improving-quality-assessment-vet.

As a result of this work, the relevant training package was revised and the new TAE qualifications enhanced. ASQA initiated a strategic risk project to ensure that RTOs seeking to transition to the new TAE qualification are quality providers. This was discussed in Chapter 4.

The recommendations in this strategic review are designed to contribute to the work to improve the quality of assessment in VET, as well as to broader reform initiatives, including:

- the review of the Australian Qualifications Framework
- the review of the *National Vocational Education and Training Regulator Act 2011* and its subordinate legislation, and
- ongoing enhancements to the My Skills website to improve the quality and accessibility of information available for VET consumers.

The way forward

ASQA is of the view that the quality of VET outcomes would be improved by a sensible and proportionate change to the VET architecture that:

- sets a consistent definition of 'amount of training' across all nationally recognised qualifications
- ensures industry risks are proactively addressed, and
- allows industry, where warranted, to set specific training and assessment delivery requirements, including course duration requirements, in the relevant training packages.

While the review has focused on the risk posed by unduly short training, the recommendations in this review have been developed to enable training package developers to respond to the broader risks to quality associated with the training covered by their industry-specific training packages.

Supplementing this initiative by providing improved consumer information would also improve the quality of VET outcomes by enhancing the transparency of the VET system and enabling industry and learners to make informed choices based on accurate and consistently presented information.

Over time if duration is able to be effectively regulated in certain industry sectors and there is a corresponding lift in the quality of outcomes, occupational licensing regulators may have the confidence to remove the additional regulatory requirements they currently impose, reducing regulatory burden and the current inconsistencies in requirements that exist across jurisdictions.


5.7 Proposed strategy and recommendations

ASQA recommends a single, coherent strategy (comprising three related recommendations) to address the unacceptable risk that unduly short training poses to individual learners, employers, industry, the community and the quality of the VET system. The recommended strategy supports the COAG Industry and Skills Council objectives established in 2014 to guide the reform of Australia's VET system and complements other reform initiatives underway.

Although focused on the issue of unduly short training, ASQA contends that the strategy proposed will provide the vehicle to address a range of VET quality concerns and as a result drive significant, long-lasting improvements for all stakeholders of the system.

The strategy recommends:

1. Strengthening the Standards for RTOs by defining the term 'amount of training' to include the supervised learning and assessment activities required for both training packages and VET accredited courses.
2. Ensuring effective regulation of training by enabling Industry Reference Committees (IRCs) to respond to identified risk by including appropriate training delivery requirements, including the amount of training:

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- c) in the endorsed component of training packages (as mandatory) where they judge this is warranted, and/or
 - d) in the companion volume of the training packages (as recommended) where this is judged as a more proportionate response to the risk
 - 3. Enhancing transparency by requiring public disclosure of the amount of training in product disclosure statements, presented in a consistent way to enable comparisons across courses.

Recommendation 1

That the *Standards for Registered Training Organisations 2015* be amended to include a definition of the 'amount of training' that focuses on supervised learning and assessment activities

Under Standard 1 of the *Standards for Registered Training Organisations 2015*, RTOs must establish an 'amount of training' for each qualification they deliver. To do so, they are required to take into account the existing skills, knowledge and experience of the learner; the mode of delivery; and the requirements of the training package or VET accredited course.

The current Standards do not, however, contain an explicit definition of what is actually meant by or included in the amount of training. This gives rise to misunderstandings and differing interpretations across and within RTOs. In the absence of an explicit definition of amount of training, it has been taken to be analogous to the AQF volume of learning.

The AQF defines the volume of learning as including all teaching and learning activities and assessment activities that a typical student is required to undertake to achieve the learning outcome. The AQF volume of learning does not differentiate between the component parts which make up the total volume of learning.

This is causing uncertainty for RTOs, learners and the regulator about both:

- the total required amount of training, and
- what proportion of training should be undertaken as supervised training activities.

The omission of a definition of amount of training continues to be a weakness of the current legislative framework, given the pivotal role that the amount of training plays in assuring the quality of learning outcomes.

The inclusion of a definition of amount of training that specifies the supervised learning and assessment activities that are included would strengthen the current legislative framework. The amount of training, so defined, would form a component of volume of learning and enable greater guidance to be given to RTOs about the amount of supervised learning and assessment activities that should be delivered.

It is recommended that the amount of training include all formal teaching, learning and assessment activities that a new learner would need to undertake to achieve the learning outcomes specified, expressed in hours. It is recognised that the definition requires further consideration to ensure it is workable and does not lead to unintended consequences.

As a starting point for this consultation, it is proposed that amount of training could include:

- supervised or guided learning, such as:
 - > tuition and other trainer-directed workshops or activities
 - > structured self-paced study

- > structured work placement
- > projects and prescribed set tasks
- Assessment activities.

It would not include unsupervised learning, such as:

- private study or preparation, including prescribed reading, or
- self-initiated learning or research.

It is not intended that each of these activities must be included in the delivery of training.

This proposed definition draws upon good practice identified in the regulatory models of other countries with competency-based training systems. The proposal aims to provide clarity for RTOs, learners, industry and the regulator about the time a learner (who is new to the industry area) would be required to undertake in supervised learning and assessment activities.


As is currently the case, learners may be required to undertake further unsupervised learning activities in addition to the supervised learning and assessment activities to ensure their total training activities are in line with the AQF volume of learning requirements. ASQA notes that the Australian Government has announced a review of the AQF Framework and it is recommended that this review give consideration to the matters raised in this report.

It is recommended that the definition of amount of training included in the Standards for RTOs be replicated in the *Standards for VET Accredited Courses 2012* and the *Standards for Training Packages 2012* (and the associated policies and procedures) to ensure a consistent definition is adopted across the three sets of standards.

ASQA recommends that the views of industry, government and RTOs are considered in finalising the 'amount of training' definition. This will ensure that any definition takes account of the practical issues associated with the delivery of supervised training and assessment activities across a range of modes of delivery.

It is recommended that:

- 1.1 A comprehensive definition of the term 'amount of training' be included in the *Standards for Registered Training Organisations 2015*, specifying the supervised learning and assessment activities that are included.
- 1.2 The definition of 'amount of training' be agreed through a consultative process commissioned by the Department of Education and Training, led by the Chair of the Australian Industry Skills Committee, and involving key stakeholders including industry, RTO and government representatives.

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- 1.3 Once finalised, the term 'amount of training' be adopted in the *Standards for VET Accredited Courses 2012* and associated VET Accredited Course requirements and documentation, the *Standards for Training Packages 2012* and the associated Training Package Development and Endorsement Process Policy.
 - 1.4 The current review of the Australian Qualifications Framework give consideration to the issues raised in this report in relation to the application of the AQF to the VET sector.

Recommendation 2

That training package developers be able to respond to industry-specific risks by setting mandatory requirements, including an amount of training.

The review has found that depending on the drivers at play, certain industries and qualifications are more vulnerable to the risk of unduly short training than others. It is also acknowledged that there are other risks to quality training, often interrelated with course duration.

This review has documented the training package qualifications most at risk of unduly short training. It has also documented that there are training package qualifications which appear to be less at risk. There are risks that relate to, for example, the quality of assessment and the mode of delivery. As a result, the response to these risks should not be a 'one size fits all' solution. Rather, industry should be supported to develop a proportionate response to the risk in particular industries.

The current VET regulatory architecture does not allow for industry to systematically identify and respond to risks by strengthening the requirements governing the delivery of training and assessment. ASQA recognises that the response to unduly short training must be driven by industry and must be proportionate to the risk.

A more comprehensive and structured approach to the timely identification of emerging risks across the VET sector and for specific industries is needed to inform the developers of training products.


It is recommended that where widespread poor quality-training poses an unacceptable risk—including a risk to the learner, the workplace, the community or the environment—or where there are already systemic issues with the quality of training, IRCs must respond to this risk.

The IRC response would involve specifying training delivery and assessment requirements, including the amount of training appropriate for a new learner.

This process would involve the IRCs:

- assessing the risk to determine the significance of its impact, and
- recommending a strategy to effectively mitigate the risk which may include:
 - > specifying mandatory training delivery or assessment requirements (including the amount of training where this is warranted), and/or
 - > providing enhanced guidance to RTOs through the inclusion of recommended training delivery or assessment requirements, including the amount of training.

Such requirements could be set at the unit of competency level and could sit in either the endorsed components of training packages (so that they are mandatory for RTOs and auditable by the regulator) or in the companion volume (where they would be advisory only).



It is recommended that the Australian Industry and Skills Committee (AISC), in consultation with industry, governments, IRCs, Skills Service Organisations (SSOs), VET regulators, and the National Centre for Vocational Education Research (NCVER), establish a formal risk-identification process that would be used by the IRCs when developing or revising training products.

A formal risk-identification process would ensure that IRCs have access to the most current data and information, allowing them to fully assess the risk to their training package products. As part of this process, ASQA would publish an annual statement of risks based on its intelligence, compliance data and complaints data. This statement would include both risks at the whole of sector level as well as any qualifications of concern.

RTOs would be required to implement the training delivery and assessment requirements specified in the endorsed components of training packages, including the amount of training for a new learner, unless they present a rationale that justifies their delivery arrangements (for example, that their learner cohort had previous industry experience).

This recommended industry-driven and risk-based approach is appropriate, given that the VET system is a competency-based system, and not a system based on training time. A competency-based system is intended to deliver that which is needed to ensure the student acquires the skills and is assessed as competent. Each learner or group of learners can bring to the training either pre-existing skills and experience, or a set of challenges that requires more intensity.

An IRC's decision to set these mandatory requirements would need to be evidence-based and presented as part of the Case for Endorsement to the AISC. The AISC would ensure the proposed training delivery requirements are targeted, proportionate and without unintended consequences as part of the endorsement process.

Where an IRC does not recommend either a mandatory or recommended amount of training to the AISC for product endorsement, RTOs and VET regulators would continue to exercise their own professional judgement about what a sufficient amount of training is, in line with the training package or VET accredited course requirements.

Through its strategic reviews into specific industry areas and in this review, ASQA has provided an assessment of the risks that confront certain industries and it is recommended these be treated as a priority for IRC consideration.

It is recommended that:

- 2.1 The Australian Industry and Skills Committee, in consultation with industry, IRCs, SSOs, VET regulators, NCVER and government training agencies, develop a formal process to identify and address risks to the quality of training and assessment, which is to be applied consistently by IRCs when developing or revising training products.
- 2.2 Where there is evidence that the consequences of poor-quality training delivery pose an unacceptable risk to the learner, workplace, community or environment, IRCs be required to develop a risk-mitigation strategy which may include specifying training delivery and assessment requirements, including the amount of training appropriate for a new learner. These requirements may be specified in the endorsed components of training packages (as a mandatory requirement); and/or the companion volume (as guidance).
- 2.3 As part of its role in approving training packages for implementation, the Australian Industry and Skills Committee confirm the appropriateness of any training delivery and assessment requirements specified by an IRC and their capacity to mitigate the identified risk(s).
- 2.4 RTOs be required to implement the 'training delivery and assessment requirements' where they are specified in the endorsed components of training packages, unless the RTO can present a rationale that justifies their delivery arrangements (for example, that their learner cohort had previous industry experience).
- 2.5 Given the considerable risks already documented by ASQA in this and previous reviews, the IRCs responsible for the following training packages and skill sets be asked to respond to these risks. This should include giving consideration to specifying a mandatory amount of training appropriate for a new learner as a matter of priority for the following sectors:
 - > aged and community care
 - > early childhood education and care
 - > security operations
 - > equine programs
 - > construction safety induction ('White Card')
 - > training and education.

Recommendation 3

That RTOs be required to publish Product Disclosure Statements that include the range of learning activities expected, including the amount of training, for each training product on their scope of registration.

This recommendation addresses the lack of transparency and consistency in the way training products are advertised and described to potential learners through the introduction of a Product Disclosure Statement for every training product on an RTO's scope.

This review has found that RTOs' current advertising practices vary significantly and, as a result, are confusing for VET consumers.

Clause 5.1 of the current Standards for RTOs requires that:

' ... prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides advice to the prospective learner about the training product appropriate to meeting the learner's needs, taking into account the individual's existing skills and competencies.'

Clause 5.2 provides details of the required content which includes reference to the 'estimated duration' and requires that the advice 'be in print or through referral to an electronic copy'.

ASQA proposes that these current requirements form the basis of the Product Disclosure Statement, which would prescribe the format for how this advice is to be communicated to potential learners.

It is recommended that a template be developed for the Product Disclosure Statement that standardises how the requirements of Clause 5.2, including estimated duration, are expressed.

The template would include requirements for estimated duration; RTOs would be required to specify:

- the amount of training to be provided in **hours** (as defined in Recommendation One), and
- the other activities that learners are expected to complete to make up the AQF volume of learning requirements.

In effect, this simply requires an RTO to formally document what, under the current Standards for RTOs, an RTO already needs to establish when developing a training and assessment strategy.

Importantly, a standard Product Disclosure Statement would provide learners with easy-to-understand information about the total time commitment required to complete a qualification, including the amount of supervised learning activity that will be delivered by an RTO.

In its capacity as the national directory of VET organisations and courses, the My Skills website would also be significantly strengthened through the mandatory inclusion of each RTO's Product Disclosure Statements for all training products on their scopes of registration. Importantly, this would deliver on My Skills' stated goal of enabling 'consumers to search for, and compare, VET courses and training providers'.

It is recommended that:

- 3.1 The Department of Education and Training, in consultation with industry stakeholders, develop a template for a Product Disclosure Statement in a standard, easy-to-understand format. This template would require RTOs to specify the key features of their training and assessment strategy, including specifying in hours the estimated duration for the
 - > amount of training, and
 - > other non-supervised learning activities that contribute to the course outcomes.
- 3.2 The *Standards for Registered Training Organisations 2015* be amended to require every RTO to publish a corresponding 'Product Disclosure Statement' that conforms to an agreed template for each training product on its scope of registration.
- 3.3 Every RTO be required to provide each prospective and current learner with the relevant Product Disclosure Statement.
- 3.4 All Product Disclosure Statements be made freely available through each RTO's website and the information included in or linked to any marketing of qualifications.
- 3.5 Every RTO be required to make their Product Disclosure Statement(s) available through the Australian Government's My Skills website so that employers and prospective learners can:
 - > easily understand what is needed to achieve the training outcome;
 - > be clear about the RTO effort that will go into the learning and assessment a learner will receive (in return for the cost of the training program); and
 - > be able to more readily compare the offerings of RTOs.

Summary of changes to existing standards and policy

A number of changes to existing standards and supporting policies are required to give effect to the proposed strategy. A summary of those changes is set out in the table below.

Instrument/policy	Changes required	Rec. no
Standards for Registered Training Organisations 2015	Amendment of the Glossary to include a definition of the Amount of Training	1.1, 1.2
	Amendment of the Glossary to include a definition of the Product Disclosure Statement	3.1
	Amendment of Standard 5 to ensure an RTO develops a Product Disclosure Statement for each qualification on its scope of registration	3.1
	Amendment of Standard 4 to mandate an RTO posts every current Product Disclosure Statement on the My Skills website	3.4, 3.5
	Amendment of Standard 5 to ensure learners are provided with a copy of the Product Disclosure Statement by the RTO prior to enrolment	3.2, 3.3
Standards for Training Packages 2012	Insertion of additional field in the Unit of Competency Template to enable the specification of 'training delivery requirements' by IRCs	2.2, 2.4
	Insertion of additional dot point in the Training Package Companion Volume Implementation Guide Template (Implementation Information field) to enable the specification of 'recommended amount of training' by IRCs	2.2
Training Package Development and Endorsement Process Policy	Inclusion of policy to enable IRCs to specify 'training delivery requirements' and instruction on how it is to be undertaken	2.2, 2.3, 2.4
	Inclusion of policy to enable IRCs to specify a 'recommended amount of training' and instruction on how it is to be established	2.2, 2.3, 2.4
Accredited Course Document Template and Users Guide	Amendment of Section B Course information, 1.2 Nominal duration of the course and 5.1 Course structure to revise definition of nominal duration to align it with amount of training definition.	1.3

List of acronyms

Acronym	Definition
AQF	Australian Qualifications Framework
AISC	Australian Industry and Skills Committee
ASQA	Australian Skills Quality Authority
CISC	COAG Industry and Skills Council
COAG	Council of Australian Governments
IRCs	Industry Reference Committees
NVR	National VET Regulator
NCVER	National Centre for Vocational Education Research
RTO	Registered training organisation
SSOs	Skills Service Organisations
VET	Vocational education and training
RPL	Recognition of prior learning

Glossary

Term	Definition
Access and equity	Policies and approaches aimed at ensuring that VET is responsive to the individual needs of clients whose age, gender, cultural or ethnic background, disability, sexuality, language skills, literacy or numeracy level, unemployment, imprisonment or remote location may present a barrier to access, participation and the achievement of suitable outcomes.
Amount of training	<p>The amount of training must enable a learner to:</p> <ul style="list-style-type: none"> • meet the requirements of each training product, and • gain the skills and knowledge specified in the relevant training product. <p>The amount of training essentially comprises the formal learning activities you provide to a learner.</p> <p>Source: ASQA Fact sheet—amount of training</p>
AQF qualification	An AQF qualification type endorsed in a training package or accredited in a VET accredited course.
Assessment	The process of collecting evidence and making judgements on whether competency has been achieved, to confirm that an individual can perform to the standard required in the workplace, as specified in a training package or VET accredited course.
Assessment system	A coordinated set of documented policies and procedures (including assessment materials and tools) that ensures assessments are consistent and are based on the Principles of Assessment contained in Table 1.8-1 and the Rules of Evidence contained in Table 1.8-2.
Audit	An audit or compliance audit undertaken by the VET Regulator.
Australian Industry and Skills Committee (AISC)	The Australian Industry and Skills Committee is established by the agreement of the members of the Council of Australian Governments (COAG) Industry and Skills Council as an industry-led body that provides advice on the implementation of national vocational education and training policies. The Committee's role is to provide advice to ensure that the directions taken by ministers are informed by an industry-based perspective focused on the quality and relevance of the national training system. Where required, the Committee will be delegated the authority to

Term	Definition
	<p>approve industry-defined training qualifications.</p> <p>Source: https://www.aisc.net.au/</p>
Australian Qualifications Framework (AQF)	The framework for regulated qualifications in the Australian education and training system, as agreed by the Commonwealth, State and Territory ministerial council with responsibility for higher education.
Code	The unique identifier for units of competency, skill sets, VET accredited courses, modules, AQF qualifications or training packages as required by the Standards for Training Packages and Standards for VET Accredited Courses.
Competency	The consistent application of knowledge and skill to the standard of performance required in the workplace. It embodies the ability to transfer and apply skills and knowledge to new situations and environments.
Course	<p>Course means a course of vocational education and training.</p> <p>Source: https://www.comlaw.gov.au/Details/C2015C00186</p>
Course Duration	Term to describe the amount of time elapsing between commencement and completion of a training course.
Current industry skills	<p>The knowledge, skills and experience required by VET trainers and assessors and those who provide training and assessment under supervision to ensure that their training and assessment is based on current industry practices and meets the needs of industry.</p> <p>Current industry skills may be informed by consultations with industry and may include, but is not limited to:</p> <ul style="list-style-type: none"> a) having knowledge of and/or experience using the latest techniques and processes b) possessing a high level of product knowledge c) understanding and knowledge of legislation relevant to the industry and to employment and workplaces d) being customer/client-oriented e) possessing formal industry and training qualifications and f) training content that reflects current industry practice.

Term	Definition
Independent validation	<p>For the purposes of Clause 1.25, that the validation is carried out by a validator or validators who:</p> <ul style="list-style-type: none"> a) are not employed or subcontracted by the RTO to provide training and assessment, and b) have no other involvement or interest in the operations of the RTO.
Industry	<p>The bodies that have a stake in the services provided by RTOs. These can include, but are not limited to:</p> <ul style="list-style-type: none"> a) enterprise/industry clients, e.g. employers b) group training organisations c) industry organisations d) industry regulators e) industry skills councils or similar bodies f) industry training advisory bodies, and g) unions.
Industry Reference Committees (IRCs)	<p>IRCs are the formal point through which industry requirements for skills are considered and defined in training packages. IRCs are formed and activated as required to direct SSOs in the review, development and implementation of training package content relevant to the industry sectors they cover.</p> <p>Source: https://www.aisc.net.au/sites/aisc/files/documents/Industry%20Reference%20Committee%20-%20Operating%20Framework%20May%202016%20V1_0.pdf (page 7)</p>
Industry and Skills Council	<p>The Commonwealth, State and Territory ministerial council established by the Council of Australian Governments (COAG), or its successor.</p>
Industry regulator	<p>A body or organisation responsible for the regulation and/or licensing arrangements within a specific industry or occupation.</p>
Learner	<p>A person being trained and/or assessed by the RTO for the purpose of issuing AQF certification documentation.</p>
Licensed or regulated outcome	<p>Compliance with an eligibility requirement for an occupational licence or a legislative requirement to hold a particular training product in order to carry out an activity.</p>
Mode of	<p>The method adopted to deliver training and assessment, including online, distance,</p>

Term	Definition
delivery	or blended methods.
National Register	The register maintained by the Australian Government Department responsible for VET and referred to in section 216 of the <i>National Vocational Education and Training Regulator Act 2011</i> .
Nominal hours	<p>Nominal hours are established for the purpose of recording training activity effort in the VET system and used by the National Centre for Vocational Education Research (NCVER) to report national training activity.</p> <p>'<i>Nominal hours</i>' is a value assigned to a program or subject that nominally represents the anticipated hours of supervised training deemed necessary to conduct the training and assessment activities associated with the program or subject.</p> <p>Nominal hours are allocated assuming a typical classroom-based delivery and assessment strategy and do not include hours associated with non-supervised work experience, field work, work placement or private study.</p> <p>Source: National Centre for Vocational Educational Research 2016, Nationally agreed nominal hours, viewed March 2017, https://www.ncver.edu.au/publications/publications/all-publications/statistical-standard-software/nationally-agreed-nominal-hours</p>
Nominal duration	<p>Nominal duration of a course is the nominal hours for each of the units of competency and unsupervised hours of the course which are totalled to identify the AQF volume of learning for the course.</p> <p>Nominal duration, expressed in hours, must be included in VET accredited courses.</p> <p>Source: Standards for VET Accredited Courses 2012, Users' Guide to the Standards for VET Accredited Courses, ASQA Accredited Course Document Template</p>
Recognition of Prior Learning (RPL)	<p>An assessment process that assesses the competency(s) of an individual that may have been acquired through formal, non-formal and informal learning to determine the extent to which that individual meets the requirements specified in the training package or VET accredited courses.</p> <p>a) formal learning refers to learning that takes place through a structured program of instruction and is linked to the attainment of an AQF</p>

Term	Definition
	<p>qualification or statement of attainment (for example, a certificate, diploma or university degree)</p> <p>b) non-formal learning refers to learning that takes place through a structured program of instruction, but does not lead to the attainment of an AQF qualification or statement of attainment (for example, in house professional development programs conducted by a business), and</p> <p>c) informal learning refers to learning that results through experience of work-related, social, family, hobby or leisure activities (for example the acquisition of interpersonal skills developed through several years as a sales representative).</p>
Registration	Registration as an RTO by the VET Regulator, where that registration is then entered on the National Register
RTO	A registered training organisation.
Strategic Review	Reviews conducted by ASQA under section 157(1)(e) of the NVR Act. These reviews are undertaken in response to strategic risks identified by ASQA in the VET training market. Usually guided by a reference committee drawn from key stakeholders from industry, employers, and government and chaired by ASQA.
Skills Service Organisations (SSOs)	<p>The role of SSOs is to provide services to a range of IRCs, to ensure training packages reflect the skills needs of industry. SSOs provide technical, operational and secretariat services to enable IRCs to undertake their industry engagement and training package development and review activities.</p> <p>Source: https://www.aisc.net.au/sites/aisc/files/documents/Industry%20Reference%20Committee%20-%20Operating%20Framework%20May%202016%20V1_0.pdf (page 8)</p>
Skill set	A single unit of competency or a combination of units of competency from a training package which link to a licensing or regulatory requirement, or a defined industry need.
Standards for VET Accredited Courses	The standards made under subsection 188(1) of the National Vocational Education and Training Regulator Act 2011 or the equivalent requirements adopted by a non-referring State.
Training	The process used by an RTO, or a third party delivering services on its behalf, to facilitate learning and the acquisition of competencies in relation to the training product on the RTO's scope of registration.

Term	Definition
Training and assessment strategies and practice	The approach of, and method adopted by, an RTO with respect to training and assessment designed to enable learners to meet the requirements of the training package or accredited course.
Training Package	The components of a training package endorsed by the Industry and Skills Council or its delegate in accordance with the Standards for Training Packages. The endorsed components of a Training Package are: units of competency assessment requirements (associated with each unit of competency) qualifications and credit arrangements. The endorsed components form part of the requirements that an RTO must meet under these Standards. A training package also consists of a non-endorsed, quality assured companion volume/s which contains industry advice to RTOs on different aspects of implementation.
Training Product	AQF qualification, skill set, unit of competency, accredited short course and module.
Unduly short training	Unduly short training involves VET courses being delivered in significantly shorter timeframes than those reasonably required to ensure learners gain the competencies specified in the training.
Unit of competency	The specification of the standards of performance required in the workplace as defined in a training package.
Validation	The quality review of the assessment process. Validation involves checking that the assessment tool/s produce/s valid, reliable, sufficient, current and authentic evidence to enable reasonable judgements to be made as to whether the requirements of the training package or VET accredited courses are met. It includes reviewing a statistically valid sample of the assessments and making recommendations for future improvements to the assessment tool, process and/or outcomes and acting upon such recommendations.
VET	vocational education and training.
VET accredited course	A course accredited by the VET regulator in accordance with the Standards for VET Accredited Courses.

Term	Definition
VET Quality Framework	<p>Comprises:</p> <ul style="list-style-type: none"> • the Standards for Registered Training Organisations • the Australian Qualifications Framework • the Fit and Proper Person Requirements • the Financial Viability Risk Assessment Requirements • the Data Provision Requirements • Quality Standards
VET Regulator	<p>Means:</p> <ul style="list-style-type: none"> • the National VET Regulator, and • a body of a non-referring state that is responsible for the kinds of matters dealt with under the VET legislation for that state
Volume of learning	<p>The AQF defines volume of learning as identifying the notional duration of all activities required for the achievement of the learning outcomes of a particular qualification type. The full-time volume of learning measure for a Certificate II according to the AQF is typically 1200 hours full time equivalent, and for a Certificate III, 1200 hours to 2400 hours full time equivalent.</p> <p>The Australian Qualifications Framework Council in its explanation of volume of learning, states that:</p> <p>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.</p> <p>For more detailed information refer to Appendix C</p>

References

- Australian Department of Industry 2014, Review of training packages and accredited courses: discussion paper, viewed March 2017, <https://consult.industry.gov.au/vet-reform/training-packages-review/>
- Australian Government 2015, Deloitte Access Economics, *The value of international education to Australia*, viewed March 2017, <https://internationaleducation.gov.au/research/research-papers/Documents/ValueInternationalEd.pdf>
- Australian Government, Department of Education and Training 2015, *New Arrangements for Training Product Development for Australian Industry*, viewed March 2017, https://docs.education.gov.au/system/files/doc/other/factsheet-final_27jan-revised.pdf
- Australian Government, Department of Education and Training 2016, *Redesigning VET FEE-HELP: Discussion Paper*, viewed March 2017, <https://docs.education.gov.au/documents/redesigning-vet-fee-help-discussion-paper>
- Australian Government, Department of Education and Training 2016, *Review of the alignment between the Standards for VET Accredited Courses 2012 and Standards for Training Packages Discussion Paper September 2016*.
- Australian Government, Department of Education and Training and New Zealand Qualifications Authority 2015, *Report on Enhancing Mobility – Referencing of the Australian and New Zealand Qualifications Framework*, viewed March 2017, <https://internationaleducation.gov.au/News/Latest-News/Documents/Enhancing%20mobility%20-%20Referencing%20of%20the%20Australian%20and%20New%20Zealand.pdf>
- Australian Government, Department of Industry 2013, *Standards for Training Packages*, viewed March 2017, <https://docs.education.gov.au/system/files/doc/other/standardsfortrainingpackages.pdf>
- Australian Government, Department of Industry 2014, *Training Package Development & Endorsement Process Policy*, viewed March 2017, <https://docs.education.gov.au/system/files/doc/other/trainingpackagedevelopmentandendorsementpolicy.pdf>
- Australian Qualifications Framework Council 2011, *AQF First Edition 2011*.
- Australian Qualifications Framework Council 2012, *Volume of Learning: an Explanation*, viewed March 2017, <http://www.aqf.edu.au/wp-content/uploads/2013/06/Volume-of-Learning-Explanation.pdf>
- Australian Qualifications Framework Council 2013, *Australian Qualifications Framework Second Edition 2013*.
- Australian Skills Quality Authority 2013, *Marketing and advertising practices of Australia's registered training organisations*, https://www.asqa.gov.au/sites/g/files/net2166/f/Strategic_Reviews_2013_Marketing_and_Advertising_Report.pdf

- Australian Skills Quality Authority 2013, *Training for Aged and Community Care in Australia: A national strategic review of registered training organisations offering aged and community care sector training*, viewed March 2017, <https://www.asqa.gov.au/about/strategic-reviews/aged-and-community-care-training-2013>
- Australian Skills Quality Authority 2013, *Training for aged and community care in Australia: A national strategic review of registered training organisations offering aged and community care sector training*, <https://www.asqa.gov.au/about/strategic-reviews/aged-and-community-care-training-2013>
- Australian Skills Quality Authority 2013, *Training for the White Card for Australia's Construction Industry*, https://www.asqa.gov.au/sites/g/files/net2166/f/Strategic_Reviews_2013_White_Card_Report.pdf
- Australian Skills Quality Authority 2015, Australian Skills Quality Authority Annual Report 2014–15, viewed March 2017, <https://www.asqa.gov.au/news-publications/publications/annual-reports>
- Australian Skills Quality Authority 2015, *Training for early childhood education and care in Australia*, https://www.asqa.gov.au/sites/g/files/net2166/f/Strategic_Review_2015_Early_Childhood_Education_Report.pdf
- Australian Skills Quality Authority 2015, *Training in equine programs in Australia*, https://www.asqa.gov.au/sites/g/files/net2166/f/Strategic_Review_Report_2015_Training_in_equine_programs_in_Australia.pdf
- Australian Skills Quality Authority 2016, *ASQA announces regulatory strategy*, viewed March 2017, <https://www.asqa.gov.au/news-publications/news/asqa-announces-regulatory-strategy>
- Australian Skills Quality Authority 2016, *ASQA to launch two new national strategic reviews*, viewed March 2017, <https://www.asqa.gov.au/news-publications/news/asqa-launch-two-new-national-strategic-reviews>
- Australian Skills Quality Authority 2016, *Training in Security Programs in Australia*, <https://www.asqa.gov.au/about/strategic-reviews/training-security-programs-2016>
- Australian Skills Quality Authority 2016, *Training in security programs in Australia*, viewed November 2016, <https://www.asqa.gov.au/about/strategic-reviews/training-security-programs-2016>
- Australian Skills Quality Authority 2017, *A review of issues relating to unduly short training*, unpublished.
- Australian Workforce and Productivity Agency 2013, *Future Focus 2013 National Workforce Development Strategy*, viewed March 2017, <https://docs.education.gov.au/system/files/doc/other/futurefocus2013nwds-2013.pdf>
- Beddie, F 2015, *The outcomes of education and training: What the Australian research is telling us, 2011–14*, National Centre for Vocational Education Research, Adelaide.
- Bednarz, A 2014, *Understanding the non-completion of apprentices*, National Centre of Vocational Education Research Occasional Paper, Adelaide
- Burke, G 2016, *VET: Securing Skills for Growth, VET: finance and quality*, Committee for Economic Development of Australia, ch 6, viewed March 2017,

http://adminpanel.ceda.com.au/FOLDERS/Service/Files/Documents/31760~CEDAVETReportAugust2016Final_flattened.pdf

- Commonwealth of Australia 2015, *Standards for Registered Training Organisations (RTOs) 2015*, viewed March 2017, <https://www.legislation.gov.au/Details/F2014L01377>
- Community Services and Health Industry Skills Council 2015, *Environmental Scan 2014*, viewed March 2017, http://www.cshisc.com.au/media/264207/2014_EScan.pdf
- Council of Australian Governments, COAG Industry and Skills Council 2016, Meeting of Skills Ministers Communique, viewed March 2017, https://docs.education.gov.au/system/files/doc/other/cisc_communique_skills_session_1_april_2016.pdf
- Essential Services Commission 2011, *VET FEE and Funding Review Volume 1: Blueprint for Change*, viewed March 2017, <http://www.esc.vic.gov.au/document/other-sectors/25219-final-report-volume-1-blueprint-for-change/>
- European Centre for the Development of Vocational Training 2014, *Terminology of European education and training policy: a selection of 100 key terms*, viewed March 2017, <http://www.cedefop.europa.eu/en/publications-and-resources/publications/4064>
- European Centre for the Development of Vocational Training 2016, *ECVET in Europe: monitoring report 2015*, viewed March 2017, <http://www.cedefop.europa.eu/en/publications-and-resources/publications/5556>
- Halliday-Wynes, S and Misko, J 2013, *Assessment issues in VET: minimising the level of risk*, National Centre for Vocational Education Research, Adelaide.
- Korbelt, P & Misko, J 2016, *VET provider market structures: history, growth and change*, National Centre for Vocational Education Research, Adelaide.
- Mark K, & Karmel, T 2010, *The Likelihood of Completing a VET Qualification: A model-based approach*, National Centre for Vocational Education Research, Adelaide.
- Misko, J, Halliday –Wynes et al 2014, *Quality assessments: practice and perspectives*, National Centre for Vocational Education Research, Adelaide.
- Moodie, G, Fredman, N. et al, 2013, *Vocational education's variable links to vocations*, National Centre for Vocational Education Research, Adelaide.
- National Centre for Vocational Education Research 2013, *AVETMISS data element definition: edition 2.2*, viewed March 2017, <https://www.ncver.edu.au/publications/publications/all-publications/statistical-standard-software/avetmiss-data-element-definitions-edition-2.2>
- New Zealand Qualifications Authority 2014, *Guidelines for assuring national consistency of graduate outcomes for qualifications listed on the New Zealand Qualifications Framework*, viewed March 2017, <http://www.nzqa.govt.nz/assets/Providers-and-partners/Registration-and-accreditation/Consistency-of-graduate-outcomes/guidelines-consistency-of-graduate-outcomes.pdf>
- New Zealand Qualifications Authority 2014, *National external moderation guidelines for Tertiary Education Organisations* viewed March 2017, <http://www.nzqa.govt.nz/assets/Providers-and->

[partners/Assessment-and-moderation/Tertiary-Moderation/TEO-moderation-guidelines-2016.pdf](#)

- New Zealand Qualifications Authority 2015, *Guidelines for applying for approval of programmes leading to New Zealand qualifications 1-6 on the NZQF and the accreditation of organisations to provide approved programs*, <http://www.nzqa.govt.nz/assets/Providers-and-partners/Registration-and-accreditation/guidelines-approval-programme-accred.pdf>
- New Zealand Qualifications Authority 2015, *The New Zealand Qualifications Framework*, viewed March 2017, <http://www.nzqa.govt.nz/assets/Studying-in-NZ/New-Zealand-Qualification-Framework/requirements-nzqf.pdf>
- Noonan, P. 2016, *VET funding in Australia: background, trends and future directions*, viewed March 2017. <http://www.mitchellinstitute.org.au/reports/vet-funding-in-australia-background-trends-and-future-options/>
- Parliament of Australia 2016, *Inquiry into the future of Australia's aged care sector workforce*, viewed March 2017, http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/AgedCareWorkforce45
- Shah, C et al 2015, *Role of lower-level qualifications in Australia's vocational education and training system*, viewed March 2017, <http://arrow.monash.edu.au/vital/access/manager/Repository/monash:153057>
- Skills Australia 2011, *Skills for Prosperity a roadmap for vocational education and training*, viewed March 2017, <https://docs.education.gov.au/system/files/doc/other/skillsprosperityroadmap-2011.pdf>
- Stanwick, J. 2005, *Australian Qualifications Framework Lower-Level Qualifications: Pathways to where for young people?* Viewed March 2017, <https://www.ncver.edu.au/publications/publications/all-publications/australian-qualifications-framework-lower-level-qualifications-pathways-to-where-for-young-people>
- Tertiary Education Commission, *Funding and performance*, viewed March 2017, <https://www.ncver.edu.au/publications/publications/all-publications/australian-qualifications-framework-lower-level-qualifications-pathways-to-where-for-young-people>
- United Nations Educational, Scientific and Cultural Organization 2015, *Global Inventory of Regional and National Qualifications Frameworks*, viewed march 2017, <http://unesdoc.unesco.org/images/0023/002330/233043e.pdf>
- Wallis S & Pardy J 2010, *Crediting vocational education and training for learner mobility*, viewed march 2017, <https://www.ncver.edu.au/publications/publications/all-publications/crediting-vocational-education-and-training-for-learner-mobility>

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Appendix A—ASQA strategic reviews

For individual students, their employers and the public, some unduly short training has the potential to cause physical harm (as identified in previous ASQA strategic reviews). There are also a number of industries in which inadequate training can pose a significant risk to clients, fellow workers and the broader community.

ASQA's previous strategic reviews have investigated systemic risks in specific industries; these reviews have found concerns with unduly short training, including the quality of outcomes for students.

This section summarises the results of these reviews into training for the following industries:

- construction
- security
- aged and community care
- early childhood education and care, and
- equine.

Case Study: Training for the 'White Card' for Australia's construction industry

In 2013 ASQA published its strategic review report on entry-level training for the construction industry.

The unit of competency, *CPCCOHS1001A Work safely in the construction industry*, is the entry-level occupational health and safety training required for this industry. Anyone seeking to work on a construction site in Australia must complete this unit, in recognition of the high-risk nature of construction sites. While this training is a unit of competency (rather than a full qualification), the issues raised are also relevant to this review.

Once learners have successfully completed mandatory training in *CPCCOHS1001A Work safely in the construction industry*, they can be issued with a General Induction Training Card (commonly known as the 'White Card').

ASQA's strategic review into 'White Card' training was initiated in response to serious concerns raised by stakeholders about the quality of training and assessment provided by some RTOs offering this unit. Issues raised by stakeholders cast doubt on whether people issued with cards were actually competent to work safely on construction sites.

What the review found

Most training was delivered online and was of short duration. Industry was concerned about this short duration and had strong doubts that the skills and knowledge could be adequately covered.

Most people who received a White Card were found to have completed an online program with a small number of providers. Many who completed the program, particularly online, did so in a significantly shorter time than the six hours recommended by the training package developer in the companion volume to the training package. (Duration is not specified in the endorsed component of the training package.)

Most people completing online White Card training were found to complete the training and assessment in less than one hour. Most RTOs were only assessing knowledge and not skills.

Industry expressed concerns about how well RTOs delivering and assessing students online can determine whether the learner has acquired the appropriate communication competencies and whether the learners had been familiarised with a workplace. Both industry and some work, health and safety regulators were concerned about the quality of training.

The review recommended the inclusion of a minimum duration of training and assessment in the unit of competency for the White Card course.

Impacts

The bottom line impact is that workers' lives may be at risk on construction sites as a result of the issuing of White Cards to new workers who do not have the required work health and safety skills. These skills are fundamentally important in a high risk environment.

Inconsistent regulation is contributing to inconsistent quality

The state and territory work health and safety regulators did not have a consistent position on the issue of duration or mode of delivery.

Some do not reference duration, some recommend six hours and some require six hours. This lack of consistency has allowed a situation to develop where 95 per cent of White Cards are now issued as a result of an individual completing an online program, and 70 per cent of all White Cards issued in Australia were issued in just two states: Queensland and Western Australia, where there are no minimum times required for White Card training.

The diversity of arrangements set by work health and safety regulators across different jurisdictions appears to be contributing to very different quality in training arrangements for the White Card across Australia.

RTOs commented on the burdens generated by this inconsistency:

'Reduce the administrative burden for RTOs that work across jurisdictions by making requirements of the jurisdictional work health and safety regulators consistent.'

'Make the rules the same for all providers and create a level playing field.'

Large amounts of online training of short duration

The numbers of White Cards issued was high and those issued through online training of short duration form the majority.⁷⁹ The potential for a negative impact on safety on construction sites is high if these new workers do not have the required work health and safety skills.

RTOs are leaving the market

RTOs that invest in resources and appropriate training and assessment were reportedly being undercut by other RTOs. Some RTOs that delivered through face-to-face training and assessment advised ASQA that they were leaving the training market for this unit of competency, because they cannot compete with RTOs delivering White Card training and assessment online in short duration.

Employers and industry do not have confidence

At one focus group, all employers indicated they undertake their own on-site induction for new employees and most considered the White Card training to be largely superfluous.

'It is easy to identify those new employees who have received the White Card training online. Their work health and safety "readiness" is not as solid as that of new employees who gained their White Card through face-to-face training.'

What happened in response to the review

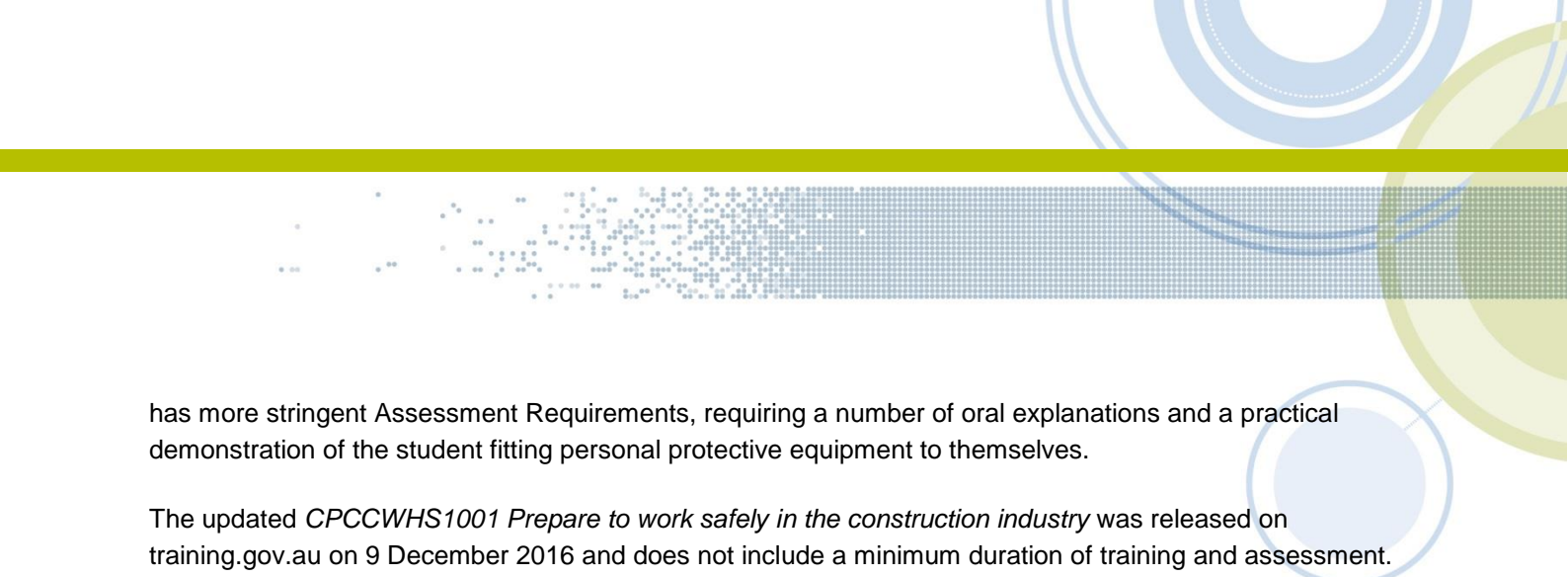
The former Industry Skills Council, Construction and Property Services Industry Skills Council (CPSISC), undertook a review and submitted a case for endorsement for the CPC Construction, Plumbing and Services Training Package to the Australian Industry and Skills Committee (AISC).

That case for endorsement included changes to the White Card unit of competency *CPCCOHS1001A Prepare to work safely in the construction industry*. The proposed changes included:

- setting the minimum duration of training and assessment at six hours, and
- the assessment of performance evidence, including through direct observation of learner assessments, being strengthened.

The AISC endorsed the revised White Card unit, *CPCCWHS1001 Prepare to work safely in the construction industry*. In line with the recommendations made in ASQA's strategic review, the revised unit

⁷⁹ Of the 47 RTOs sampled for audit in the review, 12 were found to deliver and assess online. In 2012, the 12 RTOs using the online method delivered 121,072 or 95 per cent of the total 127,392 White Card programs that were delivered by the 47 RTOs in the audit sample. Of all the RTOs using online delivery, 100 per cent were found to have training and assessment strategies with duration of four hours or less.



has more stringent Assessment Requirements, requiring a number of oral explanations and a practical demonstration of the student fitting personal protective equipment to themselves.

The updated *CPCCWHS1001 Prepare to work safely in the construction industry* was released on training.gov.au on 9 December 2016 and does not include a minimum duration of training and assessment.

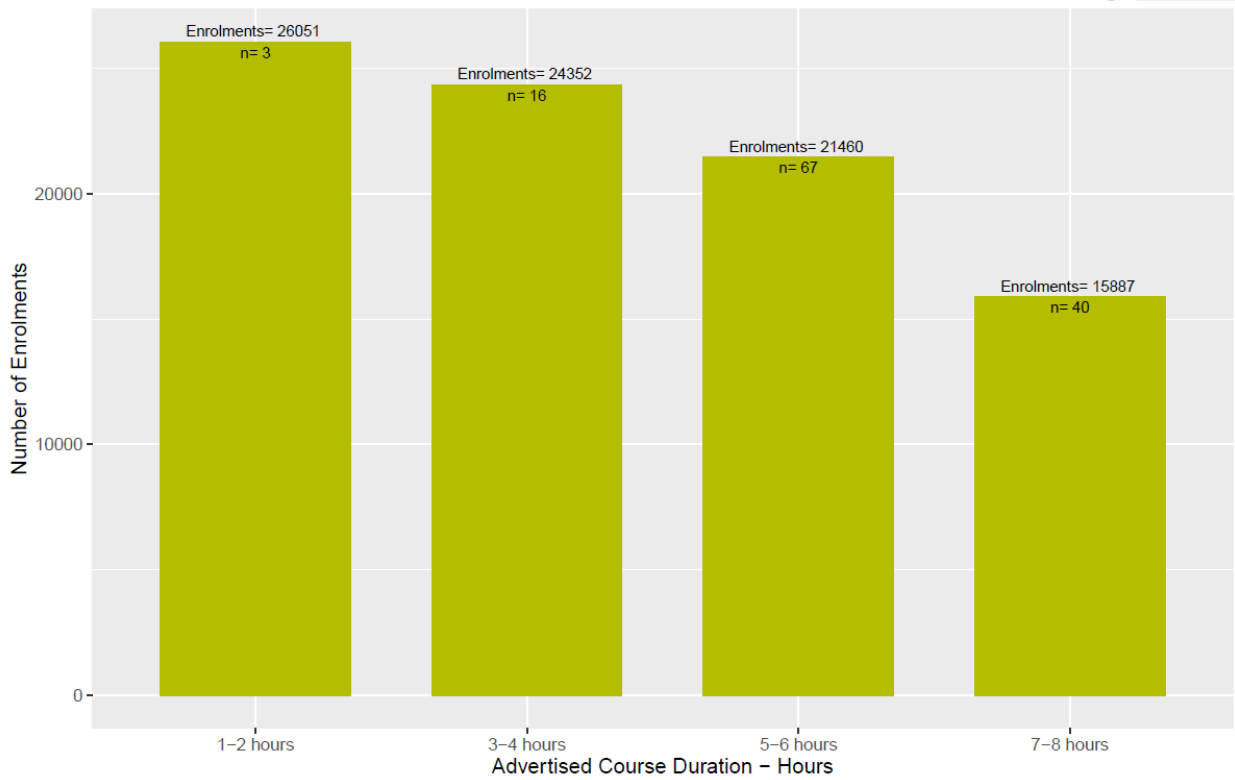
Findings in this course duration review

Figure 14 below sets out the course duration advertised by RTOs for the unit of competency *CPCCOHS1001A Work safely in the construction industry*, and the corresponding student enrolment figures for 2015. The graph shows the advertised course durations by 126 RTOs and the corresponding 87,750 enrolments for these courses. This information demonstrates that unduly short training continues to be a high risk for this course.

In the previous White Card strategic review, 58 per cent of respondent RTOs indicated that they deliver training and assessment in fewer than six hours. The advertising results in this review indicated that 68 per cent of RTOs were advertising courses of six hours or less, with 15 per cent of RTOs advertising courses of four hours or less.

Figure 14 below shows that the largest cohort of enrolments, almost 30 per cent, were in a course with an advertised duration of less than two hours and another 27 per cent were in a course with an advertised duration of between three to four hours.

Figure 14: Advertised duration—CPCCOHS1001A Work safely in the construction industry (with enrolments)



Case study: Training in the security industry

In 2016, ASQA published its strategic review report on training in security programs in Australia.⁸⁰

The review was initiated in response to concerns raised in successive reports by Coroners investigating the deaths of patrons during or as a result of restraint or intervention by security personnel in the course of incident control, particularly around licensed premises. The Coroners' reports suggest that a number of training and assessment issues were potentially contributing factors to fatalities.

What the review found

ASQA's review found that one of the biggest threats to quality training in the security industry is the **prevalence of extremely short courses** which do not allow people to gain the required skills and competencies.

The majority of training for security courses reviewed was completed in less than three weeks:

- of the 76 RTOs that were delivering the Certificate II in Security Operations, 80 per cent reported they did so in less than three weeks, and
- of the 62 RTOs delivering the Certificate III in Security Operations, almost 70 per cent reported they did so in less than three weeks.

RTOs reported that shorter programs in the security sector were delivered for a range of reasons, including learner and employer pressure for fast training in qualifications required to gain a licence, and market pressures to reduce the time taken and the cost of programs. RTOs were unable to provide a rationale related to learner needs—for example, that learners had relevant pre-existing industry experience—to justify these short timeframes.

Audits and surveys conducted of security training providers also found that between 15 and 20 per cent are delivering training and assessment in security qualifications through the **online delivery** mode.

Many stakeholders expressed concern about the use of online delivery, specifically:

- the capacity to effectively assess competence through online delivery, and
- the risk of identity fraud unless appropriate identity checks are in place.

Stakeholders also expressed concern about the fact that **much of the training is completed without any workplace assessment** because of the perceived restriction on access to workplaces imposed by licensing requirements. Employers commented that newly trained security operatives do not always have sufficient skills and knowledge for the job and Coroners' reports expressed concern about lack of workplace training and assessment impacting on competency to do the job safely.

⁸⁰ Australian Skills Quality Authority 2016, Report: *Training in security programs in Australia*.

ASQA's review confirmed that the most common mode of delivery is training completed in a classroom, with only a small number of RTOs providing training in a workplace or simulated workplace.

Impacts

The impacts are many and generate costs and increased risks for governments, employers and individual learners, training providers and the community more broadly.

Complex, inconsistent and duplicated regulation

Licensing authorities' concerns about poor-quality security industry training and assessment have resulted in:

- > Some jurisdictions imposing state-specific regulatory requirements on RTOs. These requirements are over and above, or in duplication of, those required by the industry training package and the Standards for RTOs.
- > Some jurisdictions requiring security licence applicants to attain additional units of competency or units from the higher level qualification over and above the nationally agreed minimum competency standards.

Some RTOs who are committed to high-quality training are walking away from the system

Many RTOs expressed concern at their inability to compete fairly and deliver quality in a cut-price market.

'For us the key issue is that it has been difficult to compete with RTOs offering courses in unrealistically short time frames and a market that doesn't seem to care/understand about quality training and assessment. As a result we haven't pursued the security training.'

In short we can no longer support the industry and are not prepared to compete on price at the expense of quality. We are more than happy to work with any department, agency or employer that is prepared to work towards a better industry training/licensing model.'

Employers are also concerned about quality

Several employers spoke of the need to 'retrain' security graduates in basic skills, resulting in inefficiencies, increased costs and frustration.

'I don't really think any of it is adequate.'

'Too many modules, too much content, being delivered in too short a timeframe.'

Risks to public safety remain

The most serious potential impact if the concerns persist is the continuing risk to public safety, including the potential for further fatalities if there are graduates without the required competencies for job roles that need high-level communication, conflict resolution and safe physical restraint skills.

What happened in response to the review

The ASQA strategic review recommendations were largely supported by the peak body for the security industry, the Australian Security Industry Association Ltd (ASIAL) which stated that they are:

'... fully supportive of the need to raise the quality of training and assessment provided by registered training organisations'.⁸¹

In May 2016, ASIAL released a position paper recommending '130 hours of auditable training delivery of entry level training for an unarmed guard / crowd controller ... to deliver materials in appropriate depth and provides enough time to deliver simulated workplace scenarios and conduct more rigorous assessment.'⁸²

As a result of ASQA's strategic review into security training, Artibus Innovation (the Skills Service Organisation) released a business case outlining the case for change to the training package.⁸³ The case for change was approved by the AISC in March 2017 and work has commenced on the review, which is due to be completed by 1 December 2017.

The review will address the recommendations ASQA made in its strategic review, including:

- identifying the scope of activities of the relevant security occupations
- updating the content of the units of competency to better meet industry and regulatory requirements, roles and occupational outcomes
- developing a consistent set of qualifications or units of competency that can be mandated for licensing purposes across all jurisdictions, and
- streamlining the qualifications to meet the requirements of the *Standards for Training Packages 2012* and address
 - > training and assessment requirements

⁸¹ Australian Security Industry Association Limited 2016, viewed March 2017, <https://www.asial.com.au/news/asial-comment-on-asqa-review-of-industry-training>.

⁸² Australian Security Industry Association Limited 2016, *Position on entry level training for security licensing*.

⁸³ Artibus Innovation 2017, *Security Qualification Review*, viewed March 2017, http://www.artibus.com.au/?page_id=309.

- > language, literacy and numeracy skills, and
- > workplace safety and skills (for example, safe restraint techniques).

Findings in this course duration review

ASQA’s most recent data analysis on course durations has found the concerns persist. Data in this review showed that certificates II and III qualifications in security operations have by far the greatest proportion of courses with advertised duration below 50 per cent of the lowest point of the AQF volume of learning range. This information demonstrates that unduly short training continues to be a high risk in this industry.

Figure 15 below sets out the course duration advertised by RTOs for the qualification *CPP20212 Certificate II in Security Operations* and the corresponding student enrolment figures for 2015. The graph shows the advertised course durations by 12 RTOs and the corresponding 5084 enrolments for these courses. The AQF volume of learning range is represented by the dotted lines.

No RTOs met the AQF minimum requirements of duration reflected in their advertising. Figure 15 shows 100 per cent of students were enrolled with RTOs that advertised duration well below the recommended AQF volume of learning requirements for *CPP20212 Certificate II in Security Operations*.

Figure 15: Advertised duration—CPP20212 Certificate II in Security Operations (with enrolments)

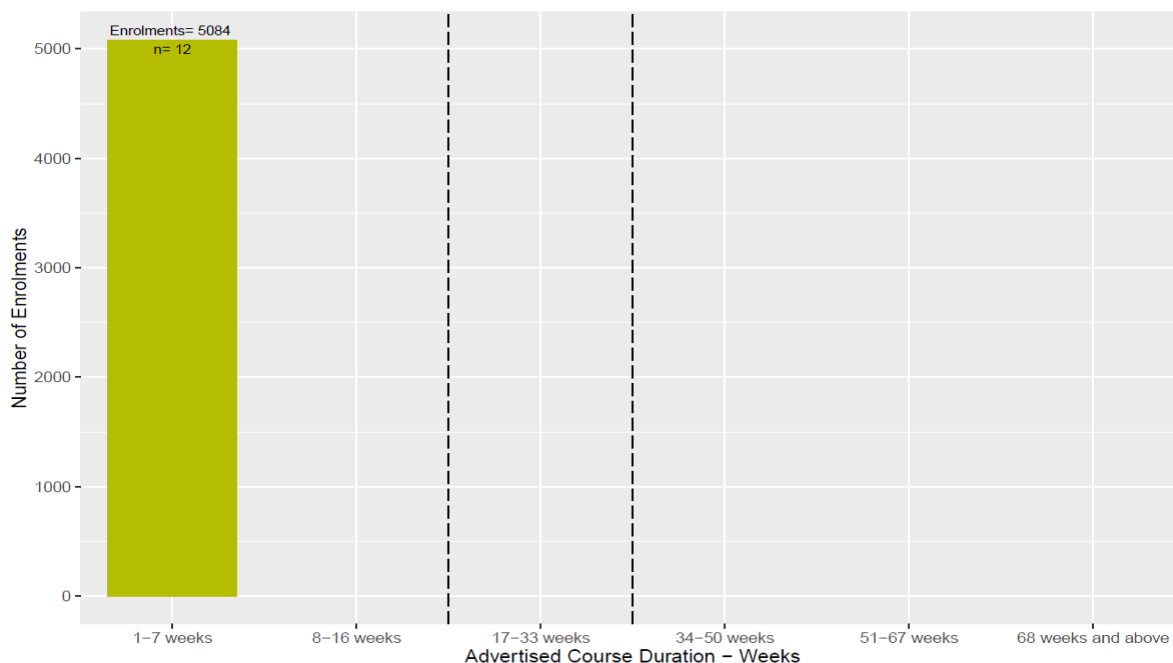
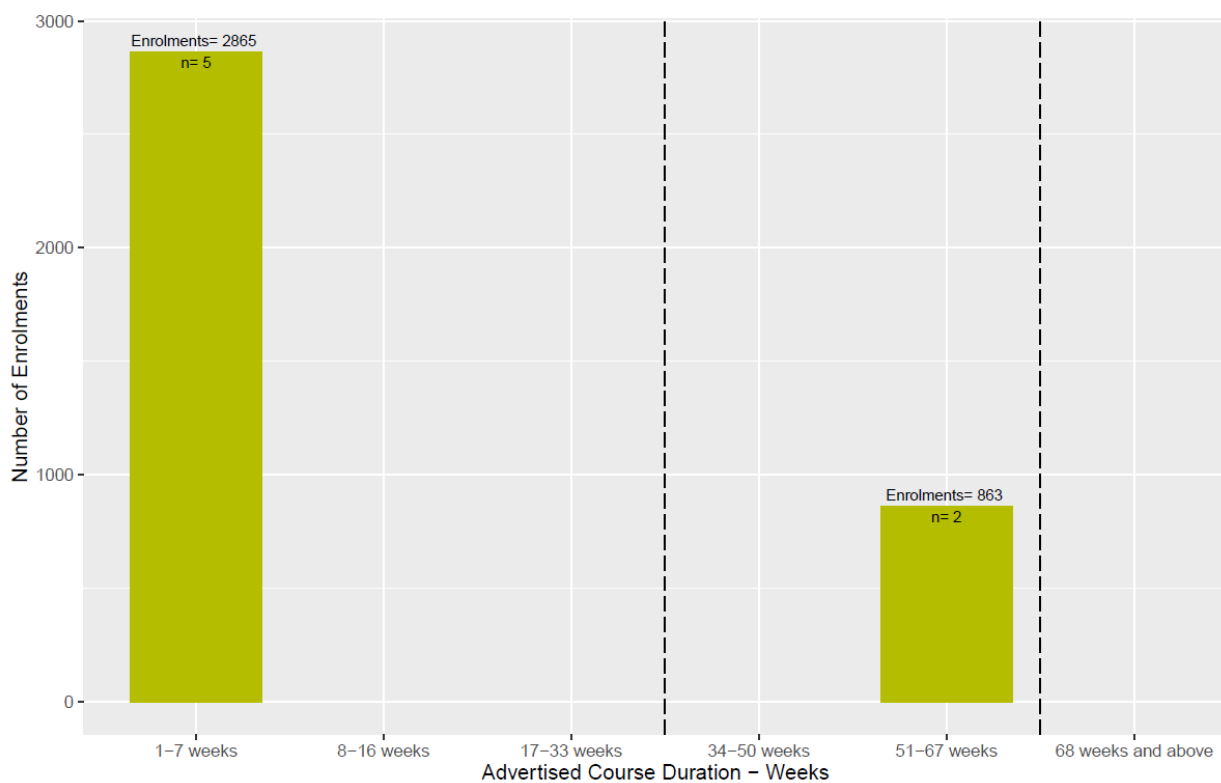


Figure 16 below sets out the course duration advertised by RTOs for the qualification *CPP30411 Certificate III in Security Operations* and the corresponding student enrolment figures for 2015. The graph shows the advertised course durations by seven RTOs and the corresponding 3728 enrolments for these courses. The AQF volume of learning range is represented by the dotted lines.

Only 29 per cent of RTOs advertised duration that met the AQF minimum requirements, with the remaining 71 per cent of RTOs advertising duration of between one and seven weeks.

Figure 16 shows 77 per cent of students were enrolled with RTOs that advertised duration of between one and seven 7 weeks, which was well below the recommended AQF volume of learning requirements for CPP304112 Certificate III in Security Operations.

Figure 16: Advertised duration—CPP30411 Certificate III in Security Operations (with enrolments)



Case study: Training in early childhood education and care

In 2015 ASQA published a strategic review of training in early childhood education and care training.

The review was initiated 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 and assessment being provided.

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 following national reforms to improve education and care. Under these arrangements, there are mandatory requirements relating to educator and coordinator qualifications, which have increased demand for the relevant qualifications.

What the review found

The review confirmed the concerns raised by the Productivity Commission. The results indicated that:

- training courses are delivered in too short a time
- most RTOs have difficulty complying with assessment requirements, and
- learning and assessment in a structured workplace environment is not done well.

It is likely that short course delivery has contributed to the poor training and assessment identified by stakeholders and through the audits of RTOs.

The review found that a significant proportion—just over 70 per cent—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.

A particularly concerning finding was that 20 per cent 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.

Employer comments included:

'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.'

A key recommendation from this review stressed that it is necessary for 'training packages to include minimum benchmarks around the amount of training required for units of competency and VET qualifications.'

The current versions of the relevant qualifications (CHC30113 Certificate III in Early Childhood and Care and CHC50113 Diploma of Early Childhood and Care) have structured work placement hours of 120 and 240 hours respectively. Some RTOs have welcomed the inclusion of minimum mandatory work placement hours, as these are seen to support longer course duration.⁸⁴

The review also found that there was a proportion of distance learning, including online, occurring. Both employers and the Productivity Commission report queried the suitability online delivery (in terms of enabling learners to undertake practical assessment in either a simulated or real workplace in order to demonstrate their competency) calling into question the level of workplace skills attained by the graduates.

Impacts

Risks to families and costs to the economy

The early childhood education and care industry is large, diverse and growing, and touches the lives of almost every family in Australia. The Productivity Commission report indicated that 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 program (comprising around 15,100 approved child care services and 4300 preschools). 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.

Short courses and poor outcomes

The delivery of too many courses in a very short time and inadequate assessment means that employers are not always getting fully skilled employees. In short, some workers' skills are inadequate for a critical high-growth industry with vulnerable clients.

Employers commented that 'short courses lead to poor delivery and poor outcomes' and that 'graduates from short courses may not get work'. Therefore, learners are also being disadvantaged.

Squeezing out quality RTOs

Those RTOs who are trying to provide high-quality programs—programs capable of delivering the skills and competencies required in a meaningful way—are being faced with unfair competition. This competition comes in the form of downward pressure (i.e. the lowering of costs or prices to unrealistic levels) from those RTOs that are providing 'cheap' and unrealistically short training programs.

⁸⁴ SkillsIQ 2017, *Community Services Training Package*, viewed March 2017, <https://www.skillsiq.com.au/TrainingPackages/CHCCommunityServicesTrainingPackage.aspx>.

VET sector not equipped to meet growth and demand

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, due to increased demand for services. Projections by the Department of Employment indicate that employment in child care services is projected to grow by 21,600 (or 21.8 per cent) 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.

What happened in response to the review

In response to the recommendations made by the strategic review, SkillsIQ (the Skills Service Organisation) was commissioned by AISC to revise the CHC Community Services Training Package.

The Children's Education and Care Industry Reference Committee is guiding this work. A discussion paper was developed to consult about the ten recommendations made by the ASQA Strategic Review and the results of the consultation process have been released by SkillsIQ.⁸⁵ The consultation process found that:

- the inconsistent quality of both training and assessment remains a key concern for industry
- duration of training remains a major issue for the sector
- the NQF requirements around child to educator ratios, qualification requirements, and the recognition of educators 'actively working towards' qualifications may unintentionally contribute to some of the quality challenges in the sector, and
- there was some support for enhanced advice about amount of training, at each qualification level, to be included in updated and revised training package Companion Volumes given the current Standards for Training Packages do not allow for its inclusion in the endorsed components.

The training package redevelopment is underway and is expected to be completed by June 2017.

Findings in this course duration review

Figure 17 sets out the course duration advertised by RTOs for the qualification *CHC30113 Certificate III in Early Childhood Education and Care* and their corresponding student enrolment figures for 2015. The graph shows the advertised course durations by 57 RTOs and the corresponding 4386 enrolments for these courses. The AQF volume of learning range is represented by the dotted lines.

⁸⁵ SkillsIQ 2017, *Improving Quality in Children's Education and Care Training: Industry Perspectives*, viewed March 2017 (link updated February 2018), <https://www.skillsiq.com.au/CurrentProjectsandCaseStudies/ChildrensEducationandCareTPD>

Fifty-six per cent of RTOs did not meet the minimum duration required and 50 per cent of students were enrolled with RTOs that advertised duration below the recommended AQF volume of learning requirements for CHC30113 Certificate III in Early Childhood Education and Care.

Figure 17: Advertised duration—CHC30113 Certificate III in Early Childhood Education and Care (with enrolments)

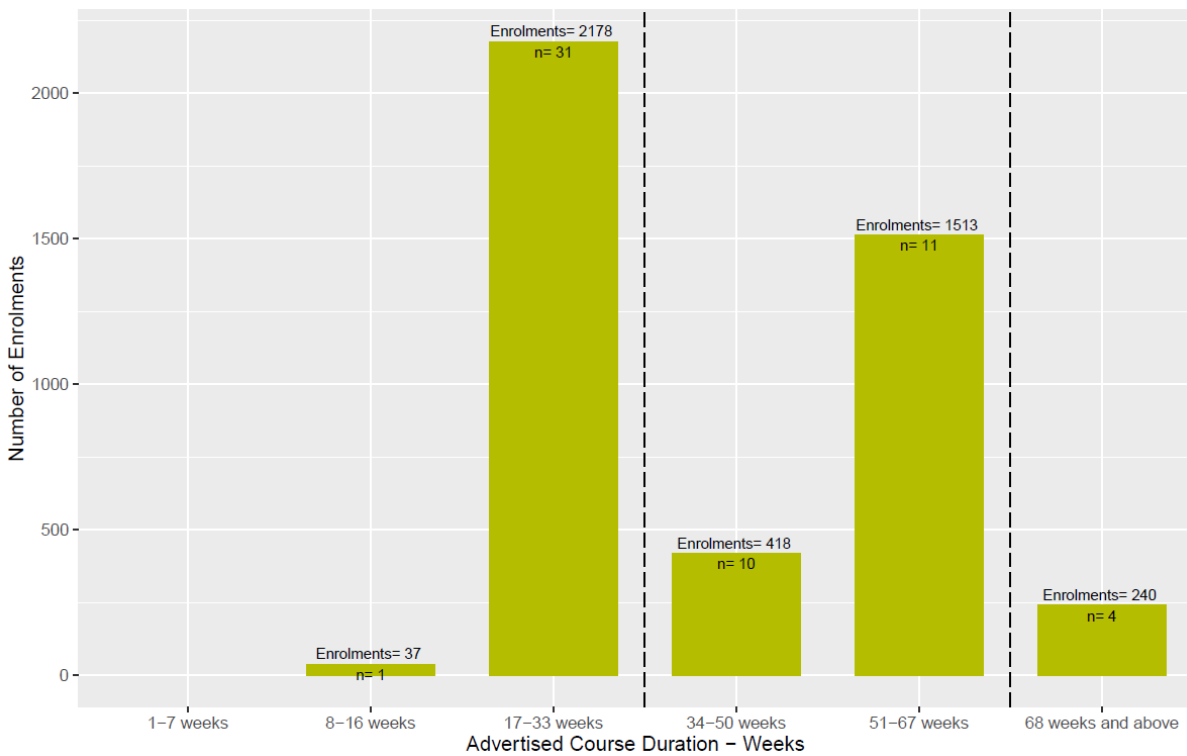
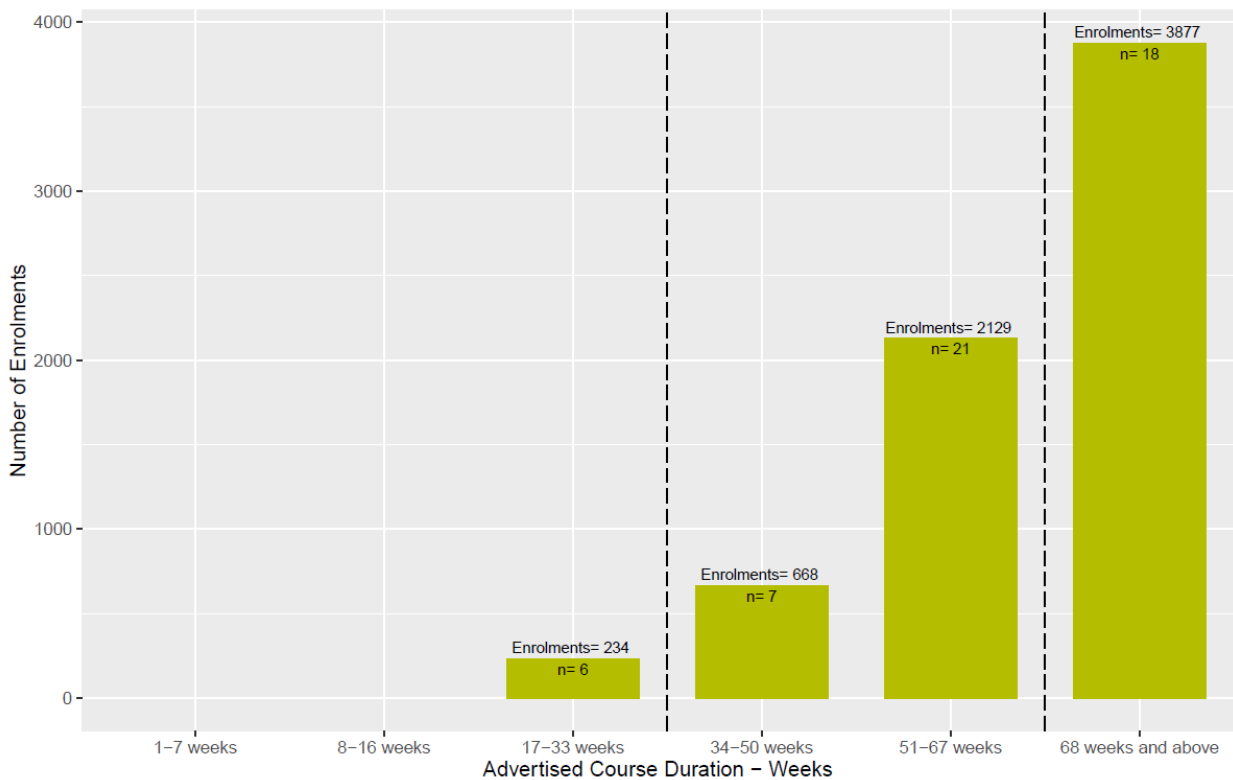


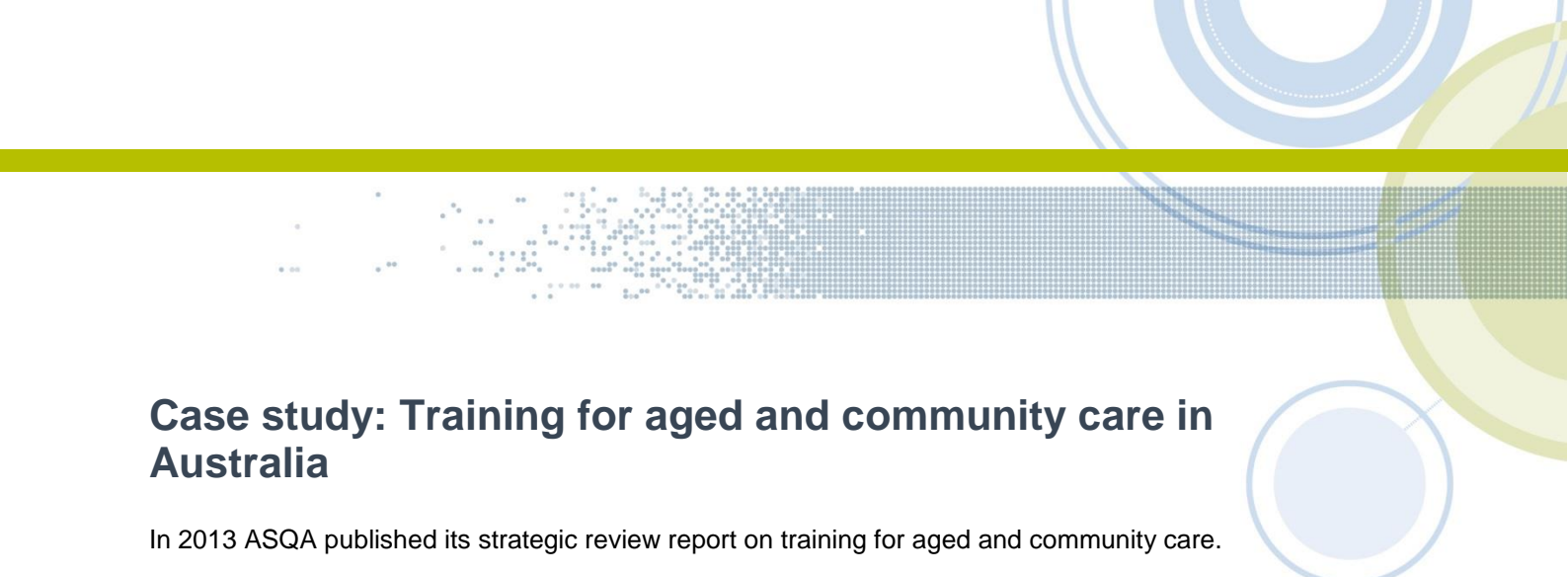
Figure 18 below sets out the course duration advertised by a range of RTOs for the qualification CHC50113 Diploma of Early Childhood Education and Care and their corresponding student enrolment figures for 2015. The graph shows the advertised course durations by 52 RTOs and the corresponding 6908 enrolments for these courses. The AQF volume of learning range is represented by the dotted lines.

Data in this review showed that 12 per cent of RTOs conducting CHC50113 Diploma of Early Childhood Education and Care have an advertised duration below the minimum AQF requirement and 88 per cent of RTOs met or exceeded the AQF minimum requirements.

Figure 18 shows three per cent of students were enrolled with RTOs that advertised duration below the recommended AQF volume of learning requirements for CHC50113 Diploma of Early Childhood Education and Care.

Figure 18: Advertised duration—CHC50113 Diploma of Early Childhood Education and Care (with enrolments)





Case study: Training for aged and community care in Australia

In 2013 ASQA published its strategic review report on training for aged and community care.

The review focused on training for the following qualifications:

- Certificates III and IV in Aged Care, and
- Certificates III and IV in Home and Community Care.

These are the critical qualifications for people already working or seeking to work as personal care workers in the aged and community care industry.

The review was initiated because of concerns raised by the Productivity Commission in their 2011 report, *Caring for Older Australians*, about the quality of vocational education and training and assessment being provided. The Productivity Commission examined the provision of aged and community care in Australia now and for the future. The expected fourfold increase in the Australian population of over-85-year-olds by 2050 will significantly increase demand for well-trained aged and community care workers. By 2050, it is expected that more than 3.5 million older Australians will access aged care services.

What the review found

The findings of this review confirmed the concerns raised by the Productivity Commission and indicated that:

- many training programs are too short and provide insufficient time to enable the proper development of all of the competencies and skills that people should be gaining from the training
- many training programs included no workplace experience, and
- there is significant variation in the duration of programs for the same qualifications.

Fast-tracked minimalist courses were being used even in cases where participants had no previous work experience or training in aged or community care. For example, the results of RTO 73 audits and 227 surveys found that:

- Up to 70 per cent of RTOs offered the Certificate III in Aged Care in less than 1200 hours, even though the Australian Qualification Framework guidelines imply a benchmark of 1200 hours or more for certificate III programs.
- A number of RTOs offered the certificate III in less than 200 hours.
- More than one-third of RTOs offered the Certificate III in Aged Care in less than 15 weeks.

RTOs advised that shorter programs were delivered for a range of reasons, including learner and employer pressure for fast training for the required qualifications, and market pressures to reduce the time taken and the cost of programs.

Employers said:

'There is too much variation in course length.'

'Courses (are) advertised for anywhere from 2-6 weeks with minimal prac (two days to one week).'

Short programs also offered limited opportunities for meaningful work placements, which are seen by employers as essential. Many programs did not integrate practice in a workplace with classroom-based training and assessment at all:

'Where applicants for employment have a certificate III [aged care] with no work experience, they are not employed.'

'Two weeks is insufficient. We have to re-train [graduates], particularly in safety areas.'

Learners commented:

'I had to do mentoring for a month [when I started a job] because of insufficient work experience. (This was for two weeks)'

'I needed more time in work placement. I only had two weeks.'

This review recommended that minimum volume of learning benchmarks be incorporated into relevant training packages in the future

Impacts

There are costs to employers, students, clients and governments

People were not properly gaining all of the required skills and competencies to do the jobs effectively. Employers, learners and clients are being 'short changed'.

As much of the delivery of aged and community care programs is funded by state and territory governments there is also a cost to the economy and the wider community from poor-quality outcomes.

It is a 'race to the bottom' and quality is the casualty

Those RTOs that were trying to provide high-quality programs—that is, programs that can deliver the skills and competencies required in a meaningful way—are being faced with unfair competition (in terms of costs and prices) from those RTOs that are providing 'cheap' and unrealistically short training programs. This creates an environment in the competitive training market where there is a 'race to the bottom' in terms of continually reducing course fees to attract students, reducing course times to attract students and reducing training and delivery effort to cut costs.

We won't be able to meet the care needs of our ageing population

The Productivity Commission has estimated that Australia's aged care workforce will need to rise from just over 350,000 today to around 980,000 by 2050, as a result of the rapid increase in the number of older Australians requiring care and support and a decline in the relative availability of informal carers. This rapid expansion in the demand for properly qualified aged care workers will not be adequately met unless the quality of aged care training delivery and assessment is improved.

What happened in response to the review

The Community Services and Health Industry Skills Committee revised the training package covering aged and community care and this process addressed a number of recommendations of ASQA's strategic review.

The revised aged and community care training package was endorsed by the National Skills Standards Council on 1 December 2015 and included requirements for:

- minimum work placement hours (120 hours) in the core of the certificate III and certificate IV qualifications;
- assessment in the workplace specified in critical aging and home and community care units, some requiring assessment first in a simulated environment prior to assessment in the workplace, and
- assessment in a workplace by a Registered Nurse (who is also a qualified VET assessor) of medication units of competency.

Findings in this course duration review

Figure 19 sets out the course duration advertised by a range of RTOs for the qualification *CHC30212 Certificate III in Aged Care* and their corresponding student enrolment figures for 2015. The graph shows the advertised course durations by 65 RTOs and the corresponding 9709 enrolments for these courses. The AQF volume of learning range is represented by the dotted lines.

There were 13 RTOs advertising courses that met the AQF requirement, which represents 20 per cent. Eighty per cent of RTOs did not meet the minimum AQF requirements in their advertised courses.

Figure 19 shows 90 per cent of learners were enrolled with RTOs which advertised courses with duration below the recommended AQF volume of learning requirements for CHC30212 Certificate III in Aged Care. There were 20 per cent of enrolments in RTOs which advertised delivery to be less than 17 weeks. Only 10 per cent of the enrolments either met or exceed the required AQF volume of learning requirements.

This information demonstrates that unduly short training continues to be a high risk in this industry.

Figure 19: Advertised duration—CHC30212 Certificate III in Aged Care (with enrolments)

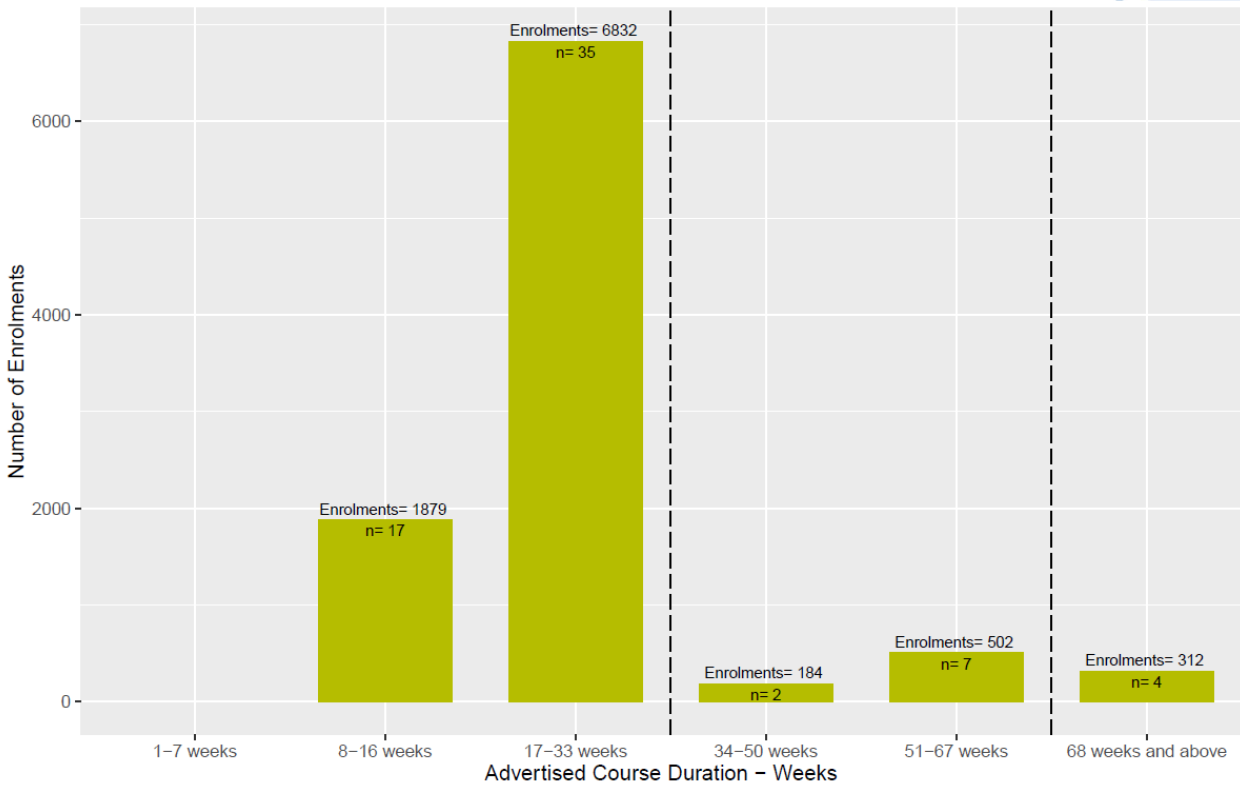


Figure 20 below sets out the course duration advertised by a range of RTOs for the qualification CHC30312 Certificate III in Home and Community Care and their corresponding student enrolment figures for 2015. The graph shows the advertised course durations by 35 RTOs and the corresponding 1617 enrolments for these courses. The AQF volume of learning range is represented by the dotted lines.

There were 26 per cent of RTOs with advertised courses which met or exceeded the AQF requirement, while 74 per cent of the RTOs had advertised courses which did not meet the minimum requirement.

Figure 20 shows 85 per cent of students were enrolled with RTOs that advertised duration below the recommended AQF volume of learning requirements for CHC30312 Certificate III in Home and Community Care. There were 21 per cent of enrolments in RTOs which advertised delivery of less than 17 weeks.

This information demonstrates that unduly short training continues to be a high risk in this industry.

Figure 20: Advertised duration—CHC30312 Certificate III in Home and Community Care (with enrolments)

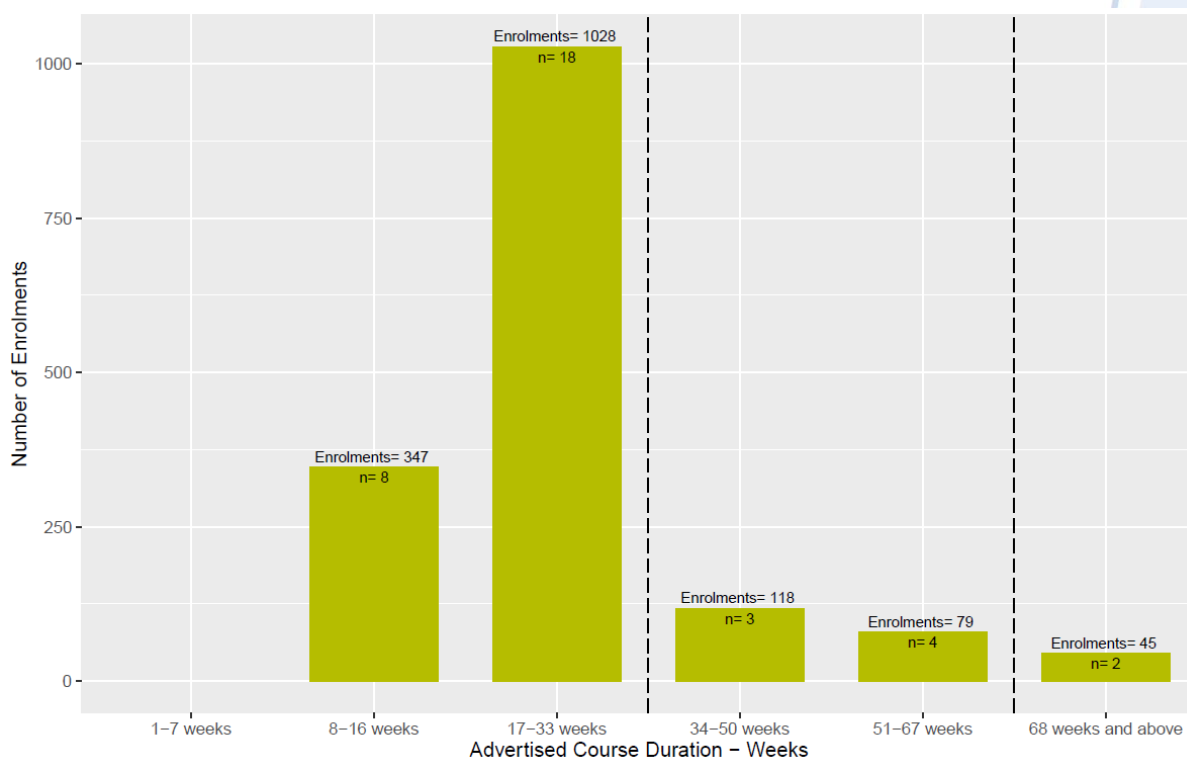
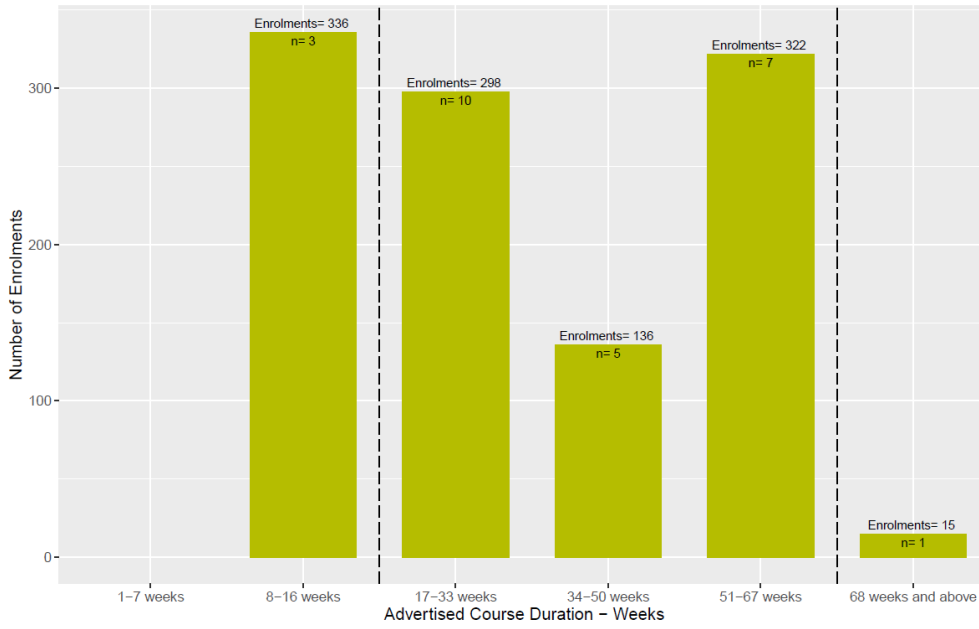


Figure 21 below sets out the course duration advertised by a range of RTOs for the qualification CHC40108 Certificate IV in Aged Care and their corresponding student enrolment figures for 2015. The graph shows the advertised course durations by 26 RTOs and the corresponding 1107 enrolments for these courses. The AQF volume of learning range is represented by the dotted lines.

There were 89 per cent of RTOs with advertised courses which met or exceeded the AQF requirement, while 11 per cent of RTOs' advertised courses did not meet the minimum requirement.

Figure 21 shows 30 per cent of learners were enrolled with RTOs that advertised duration below the recommended AQF volume of learning requirements, for CHC40108 Certificate IV in Aged Care. There were 70 per cent of enrolments which were in RTOs which met or exceeded AQF requirements in their advertising.

Figure 21: Advertised duration—CHC40108 Certificate IV in Aged Care (with enrolments)



Case study: Training in equine programs in Australia

In December 2015, ASQA published its strategic review report on training in equine programs in Australia.

The review was prompted by the death of a young student, Ms Sarah Waugh, in a horse-riding accident during training at TAFE NSW in 2009, and the systematic safety issues identified in the subsequent NSW Coroner's report.

The NSW Coroner expressed concerns about the content and conduct of the equine training, policies and procedures for assessing horses to be used in training, and the adequacy of trainer and assessor competencies and currency of industry experience.

The review focused on a broad sample of qualifications and units to ensure adequate coverage across the key sectors of agriculture; racing; sport and recreation; and animal care and management. For the purposes of summarising what equine training is being delivered, RTOs were surveyed on enrolment data for the four types of program: equine accredited courses; racing qualifications; equine units from sports and recreation qualifications; and equine units from agriculture qualifications. The data provided under each of these categories indicated that most enrolments are in the agriculture training package.

This review examined the issues of short course duration as an indicator of possible risks to safety.

What the review found

The review found that a significant proportion—just over 78 per cent—of the delivery of all certificate III qualifications in equine training 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.


Stakeholders suggested that there needs to be more rigour and detail in volume of learning or amount of training measures in training packages, as quality RTOs are being undercut by those offering shorter training.

Impacts

The major concern relating to volume of learning is that substantially shortened courses may lead to poor-quality outcomes, providing insufficient time for students to achieve competence. In the case of horse-riding and handling, this can potentially undermine safety.

What happened in response to the review

The Skills Service Organisation (SSO) for this sector, Skills Impact, released a discussion paper to industry stakeholders in August 2016, entitled *Equine discussion paper—proposed changes to address training safety issues and concerns including consideration of ASQA recommendations*. The resulting business case for change to the relevant equine training products was approved by the Australian Industry and Skills Committee (AISC) in November 2016.



Skills Impact have been commissioned by the AISC to improve safety, quality and consistency in the delivery of equine training across five training packages, addressing issues raised in ASQA's Strategic Review. This work is due to the AISC by 30 June 2017 and includes:

- revising 154 units of competency
- developing three new units of competency and two new skill sets, and
- reviewing a draft qualification, Certificate II in Horse Care.



Appendix B—Reference committee members

Mark Paterson AO (Chair) from 1 January 2017

Chief Commissioner and Chief Executive Officer, Australian Skills Quality Authority

Christopher Robinson (Chair) from April 2016 to December 2016

(Former) Chief Commissioner and Chief Executive Officer, Australian Skills Quality Authority

Megan Lilly

Australian Industry Group

Jenny Lambert

Australian Chamber of Commerce and Industry

Megan Kirchner

Business Council of Australia

Rob Bonner

Australian Industry and Skills Committee

Neil Miller

Australian Council for Private Education and Training

Keri Bailey

TAFE Directors Australia

Suzi Hewlett

Australian Government Department of Education and Training

Loris Strappazon

Department of Education and Training (Victoria)

Brett Michael

Department of Education and Training (Victoria)

Greg Norton

Department of Education and Training (Victoria)

John King

Department of State Development (South Australia)

Stephanie Trestrail

Training Accreditation Council Western Australia

Rick Harrison

Victorian Registration and Qualifications Authority

Appendix C—Volume of learning: an explanation

Volume of Learning: An Explanation

Volume of learning defined

The volume of learning is defined in the AQF as follows:

The volume of learning is a dimension of the complexity of a qualification. It is used with the level criteria and qualification type descriptor to determine the depth and breadth of the learning outcomes of a qualification.

The volume of learning identifies the notional duration of all activities required for the achievement of the learning outcomes specified for a particular AQF qualification type. It is expressed in equivalent full-time years.

Volume of learning explained

The volume of learning, along with the breadth and depth of the knowledge, skills and application of the knowledge and skills determined for a qualification, defines 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 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, on-line 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 the maximum volume of learning to be allocated to qualifications designed for:

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

If the minimum 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: An Explanation

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 credit transfer, recognition of prior learning or advanced standing.

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 integrity of the qualification outcomes is maintained. If the duration of delivery is substantially different from the volume of learning allocated to the qualification, providers should be able to provide pedagogical rationale to support the variation.

See also

- AQF explanation on proportion of components of a qualification at a level
- AQF explanation on clustered qualifications
- AQF explanation on discipline
- AQF explanation on credit transfer
- AQF explanation on articulation
- AQF explanation on recognition of prior learning

Appendix D— Training package qualifications

Appendix D sets out the full list of training package qualifications where the review found five or more duration advertisements. There are 422 training package qualifications, listed in order of the highest proportion of advertised duration that is less than half the minimum recommended by the AQF volume of learning.

Code	Qualification Name	Less than half AQF	Less than AQF	Number of Advertisements	No. of RTOs	Enrolments in advertised courses	Enrolments in equivalent qualification	Enrolment %
MAR30913	Certificate III in Maritime Operations (Master up to 24 metres Near Coastal)	100.00%	100.00%	9	8	222	646	34.37%
MAR30813	Certificate III in Maritime Operations (Marine Engine Driver Grade 2 Near Coastal)	100.00%	100.00%	5	5	123	378	32.54%
CPP20212	Certificate II in Security Operations	100.00%	100.00%	31	27	14,204	18,342	77.44%
MAR20413	Certificate II in Maritime Operations (Marine Engine Driver Grade 3 Near Coastal)	90.00%	90.00%	10	9	59	362	16.30%
CPP30411	Certificate III in Security Operations	86.67%	90.00%	30	22	9,686	12,740	76.03%
TLI41210	Certificate IV in Transport and Logistics (Road Transport - Car Driving Instruction)	85.71%	85.71%	7	6	614	997	61.58%
MAR20313	Certificate II in Maritime Operations (Coxswain Grade 1 Near Coastal)	75.00%	81.25%	16	14	766	1,795	42.67%
PSP61012	Advanced Diploma of Translating	71.43%	100.00%	7	6	2,855	2,891	98.75%
CPP30607	Certificate III in Investigative Services	70.00%	80.00%	10	10	496	616	80.52%
TLI32410	Certificate III in Logistics	60.00%	70.00%	10	8	3,597	11,971	30.05%
FNS51210	Diploma of Insurance Broking	60.00%	80.00%	5	2	494	494	100.00%
BSB30407	Certificate III in Business Administration	60.00%	60.00%	5	3	1	220	0.45%
PSP41512	Certificate IV in Government (Investigation)	50.00%	62.50%	8	7	476	988	48.18%
UEE40411	Certificate IV in Electrical - Instrumentation	50.00%	50.00%	10	10	821	1,346	61.00%
CPC31411	Certificate III in Construction Waterproofing	50.00%	50.00%	6	5	1,033	1,425	72.49%
BSB30307	Certificate III in Micro Business Operations	50.00%	75.00%	8	8	382	2,360	16.19%
SIR10112	Certificate I in Retail Services	40.00%	60.00%	5	5	81	700	11.57%
FNS60110	Advanced Diploma of Insurance Broking	40.00%	100.00%	5	2	10	10	100.00%
AVI50408	Diploma of Aviation (Instrument Flight Operations)	37.50%	75.00%	16	13	606	666	90.99%
CPC30313	Certificate III in Concreting	33.33%	33.33%	6	5	1,969	6,883	28.61%
CHC42608	Certificate IV in Celebrancy	33.33%	33.33%	6	5	292	292	100.00%
BSB30712	Certificate III in Work Health and Safety	33.33%	77.78%	9	8	1,343	2,794	48.07%
SIS30313	Certificate III in Fitness	31.58%	65.79%	76	48	20,468	30,163	67.86%
TAE40110	Certificate IV in Training and Assessment	31.32%	46.70%	182	140	32,502	53,748	60.47%
HLT32612	Certificate III in Pathology	30.77%	69.23%	13	11	2,669	4,872	54.78%
TLI31610	Certificate III in Warehousing Operations	30.00%	50.00%	30	26	9,054	15,820	57.23%
BSB40207	Certificate IV in Business	30.00%	30.00%	10	9	17	585	2.91%

Code	Qualification Name	Less than half AQF	Less than AQF	Number of Advertisements	No. of RTOs	Enrolments in advertised courses	Enrolments in equivalent qualification	Enrolment %
BSB30415	Certificate III in Business Administration	30.00%	55.00%	20	15	462	4,270	10.82%
CHC30212	Certificate III in Aged Care	29.63%	73.54%	189	132	24,497	47,208	51.89%
BSB41412	Certificate IV in Work Health and Safety	28.77%	35.62%	73	52	4,252	12,949	32.84%
BSB40807	Certificate IV in Frontline Management	28.57%	28.57%	14	12	42	401	10.47%
CHC10108	Certificate I in Work Preparation (Community services)	28.57%	42.86%	7	6	102	756	13.49%
CHC30408	Certificate III in Disability	28.36%	65.67%	67	52	3,417	7,724	44.24%
HLT31812	Certificate III in Dental Assisting	27.78%	55.56%	18	12	1,538	3,948	38.96%
BSB60707	Advanced Diploma of Project Management	26.92%	38.46%	26	22	144	311	46.30%
BSB51312	Diploma of Work Health and Safety	26.47%	58.82%	34	27	1,082	2,566	42.17%
HLT32512	Certificate III in Health Services Assistance	26.32%	86.84%	38	30	4,511	12,622	35.74%
SIT30513	Certificate III in Guiding	25.00%	91.67%	12	9	115	334	34.43%
CPC31311	Certificate III in Wall and Floor Tiling	25.00%	25.00%	8	7	548	1,908	28.72%
CHC30312	Certificate III in Home and Community Care	24.55%	71.82%	110	78	4,975	11,277	44.12%
TLI21610	Certificate II in Warehousing Operations	24.00%	40.00%	25	21	3,315	11,770	28.16%
SIT60112	Advanced Diploma of Travel and Tourism	23.53%	47.06%	17	12	162	427	37.94%
CPP40307	Certificate IV in Property Services (Real Estate)	23.53%	29.41%	17	11	13,007	19,445	66.89%
BSB30211	Certificate III in Customer Contact	23.08%	61.54%	13	11	2,339	4,221	55.41%
TLI31210	Certificate III in Driving Operations	22.22%	33.33%	9	9	15,803	28,462	55.52%
RII30813	Certificate III in Civil Construction Plant Operations	22.22%	22.22%	18	14	6,063	27,230	22.27%
ICT30115	Certificate III in Information, Digital Media and Technology	22.22%	77.78%	9	8	70	1,036	6.76%
SIT30713	Certificate III in Hospitality	21.74%	55.43%	92	69	15,671	33,159	47.26%
SIT20213	Certificate II in Hospitality	20.29%	36.23%	69	53	8,407	45,114	18.64%
SIS30310	Certificate III in Fitness	20.00%	40.00%	15	10	76	2,311	3.29%
UEE31211	Certificate III in Instrumentation and Control	20.00%	20.00%	10	6	348	753	46.22%
SIR30312	Certificate III in Retail Supervision	20.00%	50.00%	10	8	328	735	44.63%
HLT50112	Diploma of Traditional Chinese Medicine Remedial Massage (An Mo Tui Na)	20.00%	20.00%	5	4	280	280	100.00%
HLT61107	Advanced Diploma of Nursing (Enrolled/Division 2 nursing)	20.00%	60.00%	5	5	198	496	39.92%
HLT30113	Certificate III in Aboriginal and/or Torres Strait Islander Primary Health Care	20.00%	20.00%	5	4	43	279	15.41%
CPP30211	Certificate III in Property Services (Agency)	20.00%	20.00%	5	3	245	1,160	21.12%
BSB31112	Certificate III in Business Administration (Medical)	20.00%	86.67%	15	14	1,489	4,642	32.08%
SIR20212	Certificate II in Retail Services	19.44%	25.00%	36	29	4,099	22,610	18.13%
BSB51315	Diploma of Work Health and Safety	19.23%	34.62%	26	18	683	1,373	49.75%
SIT20112	Certificate II in Tourism	19.05%	33.33%	21	18	2,861	6,126	46.70%
BSB41415	Certificate IV in Work Health and Safety	19.05%	21.43%	42	26	1,890	3,798	49.76%
BSB30115	Certificate III in Business	18.92%	67.57%	37	34	683	6,500	10.51%
FNS60210	Advanced Diploma of Accounting	18.87%	64.15%	53	47	1,166	2,257	51.66%
SIT10213	Certificate I in Hospitality	18.75%	31.25%	16	15	1,632	5,473	29.82%
ICA60111	Advanced Diploma of Information Technology	18.18%	45.45%	11	8	76	244	31.15%
CUS30209	Certificate III in Technical Production	18.18%	63.64%	11	11	94	2,074	4.53%

Code	Qualification Name	Less than half AQF	Less than AQF	Number of Advertisements	No. of RTOs	Enrolments in advertised courses	Enrolments in equivalent qualification	Enrolment %
CPC31211	Certificate III in Wall and Ceiling Lining	18.18%	27.27%	11	10	763	2,216	34.43%
BSB60515	Advanced Diploma of Marketing	18.18%	40.91%	22	18	142	785	18.09%
BSB41513	Certificate IV in Project Management Practice	17.14%	25.71%	35	29	1,198	3,647	32.85%
SIS30713	Certificate III in Sport Coaching	16.67%	50.00%	6	6	431	808	53.34%
ICT30213	Certificate III in Telecommunications	16.67%	50.00%	6	4	573	4,480	12.79%
CUS30109	Certificate III in Music	16.67%	91.67%	12	10	75	3,345	2.24%
CPP40707	Certificate IV in Security and Risk Management	16.67%	16.67%	6	6	305	955	31.94%
CPC30111	Certificate III in Bricklaying/Blocklaying	16.67%	16.67%	12	9	940	2,684	35.02%
CPP20611	Certificate II in Cleaning Operations	16.67%	33.33%	6	5	593	3,688	16.08%
CPC40508	Certificate IV in Building and Construction (Site Management)	16.67%	16.67%	6	5	151	503	30.02%
BSB31012	Certificate III in Business Administration (Legal)	16.67%	66.67%	6	6	358	728	49.18%
BSB60612	Advanced Diploma of Work Health and Safety	16.67%	33.33%	6	5	184	303	60.73%
TAE50111	Diploma of Vocational Education and Training	16.28%	32.56%	43	30	1,468	2,059	71.30%
CHC30112	Certificate III in Community Services Work	16.28%	62.79%	43	33	1,830	5,842	31.32%
BSB30412	Certificate III in Business Administration	16.13%	49.46%	93	68	3,973	16,348	24.30%
SIR30212	Certificate III in Retail Operations	15.38%	41.03%	39	33	5,268	17,723	29.72%
BSB60407	Advanced Diploma of Management	14.94%	54.55%	154	119	5,698	8,600	66.26%
UEE60211	Advanced Diploma of Electronics and Communications Engineering	14.29%	14.29%	7	6	192	318	60.38%
SFL20110	Certificate II in Floristry (Assistant)	14.29%	14.29%	7	7	92	422	21.80%
HLT32812	Certificate III in Health Support Services	14.29%	71.43%	7	6	1,159	2,120	54.67%
UEE30811	Certificate III in Electrotechnology Electrician	13.33%	20.00%	15	11	9,845	24,990	39.40%
SIT31013	Certificate III in Catering Operations	13.33%	33.33%	15	12	1,249	5,882	21.23%
BSB51413	Diploma of Project Management	13.24%	35.29%	68	52	4,800	10,374	46.27%
BSB30112	Certificate III in Business	12.84%	52.29%	109	81	8,056	19,868	40.55%
SIR30112	Certificate III in Community Pharmacy	12.50%	37.50%	8	6	1,478	3,061	48.28%
HLT21212	Certificate II in Health Support Services	12.50%	25.00%	8	8	990	2,493	39.71%
FDF20111	Certificate II in Food Processing	12.50%	25.00%	8	8	1,588	2,336	67.98%
CPC40308	Certificate IV in Building and Construction (Estimating)	12.50%	25.00%	8	6	219	552	39.67%
ACM30410	Certificate III in Companion Animal Services	12.50%	50.00%	8	6	1,690	2,220	76.13%
BSB51615	Diploma of Quality Auditing	12.50%	37.50%	8	7	667	882	75.62%
BSB40407	Certificate IV in Small Business Management	12.07%	20.69%	58	48	1,925	10,493	18.35%
BSB51415	Diploma of Project Management	11.43%	42.86%	35	26	2,995	6,065	49.38%
CPC10111	Certificate I in Construction	11.11%	40.74%	27	23	30,022	41,926	71.61%
FDF30111	Certificate III in Food Processing	11.11%	22.22%	9	9	3,616	6,180	58.51%
CPC50308	Diploma of Building and Construction (Management)	11.11%	22.22%	9	8	946	1,179	80.24%
AUR20212	Certificate II in Automotive Air Conditioning Technology	11.11%	22.22%	9	8	647	1,984	32.61%
AHC32810	Certificate III in Rural Operations	11.11%	33.33%	9	7	801	1,726	46.41%
BSB20112	Certificate II in Business	10.67%	24.00%	75	60	6,067	32,678	18.57%
SIB20210	Certificate II in Nail Technology	10.53%	21.05%	38	28	908	2,832	32.06%

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BSB60507	Advanced Diploma of Marketing	10.53%	65.79%	38	33	1,528	2,552	59.87%
SIT31312	Certificate III in Travel	10.34%	68.97%	29	23	4,472	6,531	68.47%
SIS50213	Diploma of Fitness	10.34%	34.48%	29	20	1,052	1,436	73.26%
SIS30513	Certificate III in Sport and Recreation	10.00%	20.00%	10	10	10,397	12,637	82.27%
CPC30611	Certificate III in Painting and Decorating	10.00%	10.00%	10	9	2,167	4,344	49.88%
FNS30315	Certificate III in Accounts Administration	10.00%	70.00%	10	8	93	844	11.02%
ACM20110	Certificate II in Animal Studies	10.00%	20.00%	10	9	2,104	6,935	30.34%
SIB20110	Certificate II in Retail Make-Up and Skin Care	9.76%	31.71%	41	29	1,981	6,488	30.53%
ICA10111	Certificate I in Information, Digital Media and Technology	9.52%	38.10%	21	17	3,055	15,375	19.87%
BSB50615	Diploma of Human Resources Management	9.52%	19.05%	21	16	310	3,420	9.06%
BSB60207	Advanced Diploma of Business	9.52%	66.67%	63	48	1,821	3,133	58.12%
SFL30110	Certificate III in Floristry	9.09%	36.36%	11	8	722	1,364	52.93%
BSB20211	Certificate II in Customer Contact	9.09%	18.18%	11	5	1,010	1,525	66.23%
BSB42015	Certificate IV in Leadership and Management	9.09%	13.64%	22	17	869	3,280	26.49%
BSB50415	Diploma of Business Administration	8.70%	43.48%	23	19	689	5,233	13.17%
BSB40507	Certificate IV in Business Administration	8.57%	8.57%	70	51	2,595	7,475	34.72%
CPC30211	Certificate III in Carpentry	8.33%	8.33%	24	17	9,029	23,404	38.58%
BSB41015	Certificate IV in Human Resources	8.33%	8.33%	12	10	28	658	4.26%
SIS40210	Certificate IV in Fitness	8.11%	29.73%	74	43	16,628	19,544	85.08%
CHC30213	Certificate III in Education Support	8.11%	43.24%	37	30	3,580	13,031	27.47%
SIT30612	Certificate III in Events	8.00%	64.00%	25	18	323	2,420	13.35%
MEM20105	Certificate II in Engineering	7.69%	30.77%	13	12	834	3,943	21.15%
ICT20115	Certificate II in Information, Digital Media and Technology	7.69%	15.38%	13	13	303	1,704	17.78%
CUF30107	Certificate III in Media	7.69%	57.69%	26	19	1,223	5,185	23.59%
BSB60907	Advanced Diploma of Management (Human Resources)	7.69%	53.85%	13	10	319	547	58.32%
ICA30111	Certificate III in Information, Digital Media and Technology	7.55%	69.81%	53	40	3,524	15,953	22.09%
SIB30110	Certificate III in Beauty Services	7.27%	60.00%	55	36	2,450	5,473	44.77%
MEM20413	Certificate II in Engineering Pathways	7.14%	50.00%	14	13	2,524	4,748	53.16%
CPC20211	Certificate II in Construction Pathways	7.14%	42.86%	14	10	2,448	21,545	11.36%
BSB10112	Certificate I in Business	6.67%	26.67%	15	12	446	4,825	9.24%
FNS30311	Certificate III in Accounts Administration	6.45%	64.52%	31	26	991	4,457	22.23%
BSB40610	Certificate IV in Business Sales	6.25%	12.50%	16	13	604	1,608	37.56%
BSB40415	Certificate IV in Small Business Management	6.25%	12.50%	16	13	445	3,230	13.78%
TAE50211	Diploma of Training Design and Development	6.06%	24.24%	33	22	998	1,575	63.37%
SIH20111	Certificate II in Hairdressing	6.00%	52.00%	50	41	1,641	5,565	29.49%
SIT30112	Certificate III in Tourism	5.88%	47.06%	34	25	1,989	5,420	36.70%
AHC51110	Diploma of Conservation and Land Management	5.88%	17.65%	17	14	298	1,064	28.01%
AHC30910	Certificate III in Landscape Construction	5.88%	5.88%	17	15	1,811	4,138	43.77%
AHC31410	Certificate III in Conservation and Land Management	5.88%	47.06%	17	14	516	1,487	34.70%

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BSB40812	Certificate IV in Frontline Management	5.81%	11.61%	155	122	12,031	24,281	49.55%
SIS50712	Diploma of Sport and Recreation Management	5.56%	5.56%	18	11	113	298	37.92%
CUV30111	Certificate III in Visual Arts	5.56%	55.56%	18	15	556	1,593	34.90%
CHC52008	Diploma of Community Services (Case management)	5.56%	11.11%	18	16	2,105	5,555	37.89%
FNS40211	Certificate IV in Bookkeeping	5.00%	10.00%	40	33	3,226	8,098	39.84%
SIT20312	Certificate II in Kitchen Operations	4.65%	27.91%	43	37	3,986	31,239	12.76%
HLT42512	Certificate IV in Allied Health Assistance	4.55%	4.55%	22	17	671	4,448	15.09%
CHC40212	Certificate IV in Home and Community Care	4.55%	4.55%	22	17	109	1,486	7.34%
UEE22011	Certificate II in Electrotechnology (Career Start)	4.35%	73.91%	23	19	2,152	7,497	28.70%
BSB50807	Diploma of International Business	4.35%	34.78%	23	15	1,529	2,679	57.07%
BSB51107	Diploma of Management	4.12%	45.00%	340	237	38,011	59,541	63.84%
AUR20512	Certificate II in Automotive Servicing Technology	4.00%	36.00%	25	17	857	2,999	28.58%
CUF60107	Advanced Diploma of Screen and Media	3.85%	15.38%	26	17	690	927	74.43%
BSB40215	Certificate IV in Business	3.85%	9.62%	52	45	901	3,144	28.66%
CHC20112	Certificate II in Community Services	3.57%	32.14%	28	25	1,975	11,130	17.74%
SIT60313	Advanced Diploma of Hospitality	3.51%	10.53%	57	34	2,048	4,016	51.00%
BSB60215	Advanced Diploma of Business	3.45%	31.03%	29	25	186	764	24.35%
CHC30113	Certificate III in Early Childhood Education and Care	3.35%	43.02%	179	130	25,022	47,231	52.98%
BSB50215	Diploma of Business	3.30%	32.97%	91	66	3,665	11,982	30.59%
SIT50112	Diploma of Travel and Tourism	3.23%	27.42%	62	39	2,005	2,976	67.37%
BSB50207	Diploma of Business	3.00%	44.64%	233	137	32,241	44,480	72.48%
AHC30710	Certificate III in Horticulture	2.94%	26.47%	34	26	1,881	5,249	35.84%
BSB50407	Diploma of Business Administration	2.78%	47.22%	72	46	5,395	11,867	45.46%
ICA20111	Certificate II in Information, Digital Media and Technology	2.56%	23.08%	39	35	3,190	13,243	24.09%
CHC51712	Diploma of Counselling	2.44%	12.20%	41	30	9,202	17,165	53.61%
SIB50210	Diploma of Salon Management	2.04%	57.14%	49	29	2,593	2,711	95.65%
BSB51915	Diploma of Leadership and Management	2.04%	20.41%	49	33	791	9,303	8.50%
CHC40708	Certificate IV in Community Services Work	1.85%	3.70%	54	40	2,980	8,168	36.48%
SIT50212	Diploma of Events	1.43%	18.57%	70	35	5,609	7,568	74.11%
SIT50313	Diploma of Hospitality	1.39%	9.72%	144	91	5,013	9,829	51.00%
BSB40212	Certificate IV in Business	1.31%	3.27%	153	110	5,182	12,415	41.74%
CHC40312	Certificate IV in Disability	1.15%	4.60%	87	66	7,024	11,709	59.99%
BSB51207	Diploma of Marketing	1.14%	47.73%	88	55	5,439	9,739	55.85%
SIT30813	Certificate III in Commercial Cookery	0.96%	7.69%	104	75	12,926	22,506	57.43%
SIB50110	Diploma of Beauty Therapy	0.81%	1.63%	123	75	14,206	19,270	73.72%
PSP52412	Diploma of Interpreting	0.00%	75.00%	8	7	1,917	2,056	93.24%
CUV30311	Certificate III in Design Fundamentals	0.00%	60.00%	10	7	447	2,056	21.74%
BSB30110	Certificate III in Business	0.00%	60.00%	5	5	0	162	0.00%
CUL30111	Certificate III in Information and Cultural Services	0.00%	50.00%	8	6	39	471	8.28%
ICA60211	Advanced Diploma of Network Security	0.00%	46.15%	13	11	213	370	57.57%

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FNS30111	Certificate III in Financial Services	0.00%	45.45%	11	11	1,172	4,947	23.69%
BSB50613	Diploma of Human Resources Management	0.00%	45.31%	64	43	3,688	8,573	43.02%
FNS50210	Diploma of Accounting	0.00%	44.55%	110	85	3,140	11,579	27.12%
CPP31011	Certificate III in Cleaning Operations	0.00%	42.86%	7	6	1,343	2,161	62.15%
MEM10105	Certificate I in Engineering	0.00%	41.67%	12	11	1,795	11,163	16.08%
BSB50110	Diploma of Legal Services	0.00%	40.00%	5	5	216	695	31.08%
BSB10115	Certificate I in Business	0.00%	37.50%	8	6	187	1,356	13.79%
SIR50112	Diploma of Retail Management	0.00%	33.33%	15	13	266	611	43.54%
SIT60212	Advanced Diploma of Events	0.00%	33.33%	9	6	114	300	38.00%
HLT43012	Certificate IV in Dental Assisting	0.00%	33.33%	6	6	431	745	57.85%
MSF20313	Certificate II in Furniture Making	0.00%	33.33%	12	11	807	3,895	20.72%
HLT41812	Certificate IV in Pathology	0.00%	33.33%	12	10	1,157	1,566	73.88%
ICA50311	Diploma of Information Technology Systems Administration	0.00%	33.33%	15	7	665	821	81.00%
FSK10213	Certificate I in Skills for Vocational Pathways	0.00%	33.33%	6	5	229	2,959	7.74%
CUV60211	Advanced Diploma of Visual Arts	0.00%	33.33%	9	9	73	365	20.00%
FNS50311	Diploma of Finance and Mortgage Broking Management	0.00%	33.33%	6	6	2,022	4,375	46.22%
CPC20112	Certificate II in Construction	0.00%	33.33%	6	6	82	4,824	1.70%
AUR20912	Certificate II in Automotive Body Repair Technology	0.00%	33.33%	9	7	195	612	31.86%
BSB61015	Advanced Diploma of Leadership and Management	0.00%	31.58%	19	14	125	1,175	10.64%
MSL30109	Certificate III in Laboratory Skills	0.00%	30.00%	10	9	511	1,371	37.27%
BSB51215	Diploma of Marketing	0.00%	30.00%	30	24	273	2,886	9.46%
AUR50212	Diploma of Automotive Technology	0.00%	30.00%	10	10	497	628	79.14%
CUV60411	Advanced Diploma of Graphic Design	0.00%	29.41%	17	13	343	535	64.11%
BSB60915	Advanced Diploma of Management (Human Resources)	0.00%	28.57%	7	7	37	171	21.64%
AUR20712	Certificate II in Automotive Vocational Preparation	0.00%	28.57%	7	7	674	6,395	10.54%
CUF50407	Diploma of Specialist Make-up Services	0.00%	26.92%	26	21	1,910	3,264	58.52%
FSK20113	Certificate II in Skills for Work and Vocational Pathways	0.00%	25.00%	8	8	2,008	12,073	16.63%
ICT10115	Certificate I in Information, Digital Media and Technology	0.00%	25.00%	8	6	155	3,382	4.58%
CUF50207	Diploma of Interactive Digital Media	0.00%	25.00%	24	14	339	787	43.07%
BSB20115	Certificate II in Business	0.00%	23.53%	17	17	730	6,999	10.43%
HLT32412	Certificate III in Allied Health Assistance	0.00%	23.08%	13	9	2,153	4,020	53.56%
ICA50911	Diploma of Digital Media Technologies	0.00%	22.73%	22	13	1,682	1,799	93.50%
FDF30610	Certificate III in Retail Baking (Bread)	0.00%	22.22%	9	9	998	1,525	65.44%
FNS50215	Diploma of Accounting	0.00%	22.22%	9	9	68	3,410	1.99%
HLT42812	Certificate IV in Kinesiology	0.00%	20.00%	5	5	431	468	92.09%
HLT52012	Diploma of Practice Management	0.00%	20.00%	5	5	544	3,594	15.14%
FSK10113	Certificate I in Access to Vocational Pathways	0.00%	20.00%	5	4	812	5,057	16.06%
MEM60112	Advanced Diploma of Engineering	0.00%	20.00%	5	3	454	727	62.45%
FDF50311	Diploma of Food Science and Technology	0.00%	20.00%	5	3	80	80	100.00%

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								%
CUS60209	Advanced Diploma of Sound Production	0.00%	20.00%	5	5	48	142	33.80%
CHC60312	Advanced Diploma of Community Sector Management	0.00%	20.00%	20	16	862	1,636	52.69%
CUA50313	Diploma of Dance Teaching and Management	0.00%	20.00%	5	3	168	168	100.00%
BSB60615	Advanced Diploma of Work Health and Safety	0.00%	20.00%	5	5	90	251	35.86%
AHC30610	Certificate III in Production Horticulture	0.00%	20.00%	5	5	292	449	65.03%
MSS30312	Certificate III in Competitive Systems and Practices	0.00%	18.18%	11	9	2,294	6,303	36.40%
ICA50611	Diploma of Website Development	0.00%	18.18%	22	14	2,265	2,821	80.29%
CUF50107	Diploma of Screen and Media	0.00%	17.24%	29	20	555	1,793	30.95%
TLI21210	Certificate II in Driving Operations	0.00%	16.67%	6	6	1,997	3,822	52.25%
TLI41810	Certificate IV in Warehousing Operations	0.00%	16.67%	12	10	2,464	6,202	39.73%
CPC31011	Certificate III in Solid Plastering	0.00%	16.67%	6	6	323	690	46.81%
CUS60109	Advanced Diploma of Music	0.00%	16.67%	6	6	130	217	59.91%
CHC52108	Diploma of Community Services (Financial counselling)	0.00%	16.67%	6	6	126	235	53.62%
CUV60311	Advanced Diploma of Creative Product Development	0.00%	16.67%	6	3	17	109	15.60%
CUS50209	Diploma of Sound Production	0.00%	15.38%	13	10	91	1,205	7.55%
CPC40110	Certificate IV in Building and Construction (Building)	0.00%	14.71%	34	28	14,173	21,376	66.30%
HLT40312	Certificate IV in Massage Therapy Practice	0.00%	14.44%	90	50	6,133	7,241	84.70%
SIS30413	Certificate III in Outdoor Recreation	0.00%	14.29%	7	6	800	1,151	69.50%
SIT40112	Certificate IV in Guiding	0.00%	14.29%	7	5	28	66	42.42%
ICA50411	Diploma of Information Technology Networking	0.00%	14.29%	35	23	746	4,056	18.39%
ICT50115	Diploma of Information Technology	0.00%	14.29%	7	5	58	896	6.47%
FNS50611	Diploma of Financial Planning	0.00%	14.29%	14	13	2,280	10,816	21.08%
CUA50413	Diploma of Live Production and Technical Services	0.00%	14.29%	7	7	178	214	83.18%
AHC21010	Certificate II in Conservation and Land Management	0.00%	14.29%	14	11	922	2,348	39.27%
CHC40608	Certificate IV in Leisure and Health	0.00%	13.04%	23	21	1,198	2,865	41.82%
FNS40811	Certificate IV in Finance and Mortgage Broking	0.00%	12.50%	8	7	2,489	7,658	32.50%
CUF20107	Certificate II in Creative Industries (Media)	0.00%	12.50%	8	7	793	2,912	27.23%
AHC20410	Certificate II in Horticulture	0.00%	12.12%	33	26	2,413	7,723	31.24%
MSF60113	Advanced Diploma of Interior Design	0.00%	11.11%	9	7	179	340	52.65%
HLT51407	Diploma of Aromatherapy	0.00%	11.11%	9	7	89	98	90.82%
HLT60112	Advanced Diploma of Western Herbal Medicine	0.00%	11.11%	9	7	672	1,047	64.18%
CUS20109	Certificate II in Music	0.00%	11.11%	9	7	243	2,937	8.27%
AUR50112	Diploma of Automotive Management	0.00%	11.11%	9	8	54	136	39.71%
FDF30710	Certificate III in Retail Baking (Combined)	0.00%	10.00%	10	10	1,369	2,775	49.33%
CUV20111	Certificate II in Visual Arts	0.00%	9.09%	11	9	698	4,699	14.85%
SIS50612	Diploma of Sport Development	0.00%	8.70%	23	17	842	2,310	36.45%
SIT40212	Certificate IV in Travel and Tourism	0.00%	8.70%	23	18	1,825	2,228	81.91%
SIH40111	Certificate IV in Hairdressing	0.00%	8.33%	36	30	264	519	50.87%

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MSF50213	Diploma of Interior Design and Decoration	0.00%	8.33%	24	17	1,242	4,401	28.22%
CUV40311	Certificate IV in Design	0.00%	8.33%	24	19	1,233	3,975	31.02%
SIR40212	Certificate IV in Retail Management	0.00%	7.69%	26	20	938	2,243	41.82%
CUL50111	Diploma of Library and Information Services	0.00%	7.69%	13	11	502	1,532	32.77%
CHC50413	Diploma of Youth Work	0.00%	7.69%	26	20	3,402	6,950	48.95%
HLT51712	Diploma of Reflexology	0.00%	7.14%	14	10	315	349	90.26%
LMT60307	Advanced Diploma of Applied Fashion Design and Technology	0.00%	7.14%	14	13	296	421	70.31%
ICA50111	Diploma of Information Technology	0.00%	6.90%	29	25	2,255	3,385	66.62%
CHC40108	Certificate IV in Aged Care	0.00%	6.90%	58	50	3,885	8,081	48.08%
ICA50711	Diploma of Software Development	0.00%	6.67%	30	18	536	1,334	40.18%
CUF40107	Certificate IV in Screen and Media	0.00%	6.67%	15	11	162	666	24.32%
CUA50213	Diploma of Musical Theatre	0.00%	6.67%	15	9	228	284	80.28%
AHC20110	Certificate II in Agriculture	0.00%	6.67%	15	11	2,604	9,606	27.11%
BSB40312	Certificate IV in Customer Contact	0.00%	6.67%	15	12	859	2,425	35.42%
CUV50311	Diploma of Graphic Design	0.00%	6.38%	47	29	1,806	4,816	37.50%
SIT31113	Certificate III in Patisserie	0.00%	6.25%	32	24	1,164	2,204	52.81%
CHC50213	Diploma of School Age Education and Care	0.00%	6.25%	16	13	448	566	79.15%
HLT50307	Diploma of Remedial Massage	0.00%	6.02%	83	49	3,467	4,329	80.09%
CHC52212	Diploma of Community Services Coordination	0.00%	5.88%	17	17	232	959	24.19%
CHC50108	Diploma of Disability	0.00%	5.26%	19	17	586	1,229	47.68%
CHC50113	Diploma of Early Childhood Education and Care	0.00%	5.13%	156	115	32,274	62,706	51.47%
AHC50410	Diploma of Horticulture	0.00%	5.00%	20	15	430	819	52.50%
SIH30111	Certificate III in Hairdressing	0.00%	4.76%	84	59	7,364	12,840	57.35%
CHC50612	Diploma of Community Services Work	0.00%	4.23%	71	53	5,649	15,579	36.26%
CUS50109	Diploma of Music	0.00%	4.17%	24	18	414	718	57.66%
FNS40611	Certificate IV in Accounting	0.00%	2.83%	106	79	5,912	14,448	40.92%
BSB41307	Certificate IV in Marketing	0.00%	2.33%	43	35	1,774	3,491	50.82%
SIT40313	Certificate IV in Hospitality	0.00%	2.13%	47	36	1,627	7,570	21.49%
HLT51612	Diploma of Nursing (Enrolled-Division 2 nursing)	0.00%	1.72%	58	39	12,615	22,624	55.76%
SIT40413	Certificate IV in Commercial Cookery	0.00%	1.35%	74	54	3,634	7,140	50.90%
SIB40110	Certificate IV in Beauty Therapy	0.00%	0.00%	55	44	685	2,269	30.19%
AUR30612	Certificate III in Light Vehicle Mechanical Technology	0.00%	0.00%	53	38	6,931	14,053	49.32%
CHC40512	Certificate IV in Mental Health	0.00%	0.00%	40	30	1,906	4,833	39.44%
MEM30305	Certificate III in Engineering - Fabrication Trade	0.00%	0.00%	37	26	4,551	10,015	45.44%
CHC40413	Certificate IV in Youth Work	0.00%	0.00%	34	24	943	4,814	19.59%
ICA40411	Certificate IV in Information Technology Networking	0.00%	0.00%	30	19	881	2,383	36.97%
ICA40111	Certificate IV in Information Technology	0.00%	0.00%	26	18	1,295	2,563	50.53%
MEM30205	Certificate III in Engineering - Mechanical Trade	0.00%	0.00%	25	19	3,953	8,528	46.35%
BSB41013	Certificate IV in Human Resources	0.00%	0.00%	25	21	1,493	3,219	46.38%
BSB41107	Certificate IV in International Trade	0.00%	0.00%	25	11	815	1,322	61.65%

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AUR40212	Certificate IV in Automotive Mechanical Diagnosis	0.00%	0.00%	23	15	1,009	1,404	71.87%
CHC40412	Certificate IV in Alcohol and Other Drugs	0.00%	0.00%	22	18	898	2,378	37.76%
CPC50210	Diploma of Building and Construction (Building)	0.00%	0.00%	21	17	4,795	12,540	38.24%
CUV50111	Diploma of Visual Arts	0.00%	0.00%	21	17	535	1,384	38.66%
SIT40713	Certificate IV in Patisserie	0.00%	0.00%	20	14	1,187	1,638	72.47%
LMT50307	Diploma of Applied Fashion Design and Technology	0.00%	0.00%	20	15	484	1,179	41.05%
MEM40105	Certificate IV in Engineering	0.00%	0.00%	20	13	4,588	6,385	71.86%
CUS40109	Certificate IV in Music	0.00%	0.00%	20	14	327	579	56.48%
MSF40113	Certificate IV in Interior Decoration	0.00%	0.00%	19	13	509	798	63.78%
CHC40213	Certificate IV in Education Support	0.00%	0.00%	19	17	907	2,813	32.24%
CUV50411	Diploma of Photo Imaging	0.00%	0.00%	18	15	303	1,830	16.56%
AUR31112	Certificate III in Heavy Commercial Vehicle Mechanical Technology	0.00%	0.00%	18	13	1,394	3,586	38.87%
CHC40113	Certificate IV in School Age Education and Care	0.00%	0.00%	18	12	502	644	77.95%
CUV40111	Certificate IV in Visual Arts	0.00%	0.00%	17	16	394	585	67.35%
BSB41315	Certificate IV in Marketing	0.00%	0.00%	15	14	142	1,377	10.31%
TLI50410	Diploma of Logistics	0.00%	0.00%	14	14	1,558	3,192	48.81%
MSL50109	Diploma of Laboratory Technology	0.00%	0.00%	14	11	699	1,838	38.03%
MSL40109	Certificate IV in Laboratory Techniques	0.00%	0.00%	14	12	395	1,805	21.88%
CUA40113	Certificate IV in Dance	0.00%	0.00%	14	8	220	497	44.27%
AVI40108	Certificate IV in Aviation (Commercial Pilot Aeroplane Licence)	0.00%	0.00%	14	12	555	593	93.59%
AHC30110	Certificate III in Agriculture	0.00%	0.00%	14	12	3,340	5,248	63.64%
AHC31010	Certificate III in Parks and Gardens	0.00%	0.00%	14	14	1,472	2,491	59.09%
BSB40515	Certificate IV in Business Administration	0.00%	0.00%	14	12	114	2,773	4.11%
MSF31113	Certificate III in Cabinet Making	0.00%	0.00%	13	11	964	3,098	31.12%
CHC50412	Diploma of Community Services (Alcohol, other drugs and mental health)	0.00%	0.00%	13	10	698	1,568	44.52%
CPP50911	Diploma of Building Design	0.00%	0.00%	13	9	465	3,121	14.90%
MSS40312	Certificate IV in Competitive Systems and Practices	0.00%	0.00%	12	9	4,814	7,501	64.18%
HLT61012	Advanced Diploma of Nutritional Medicine	0.00%	0.00%	12	9	2,705	4,753	56.91%
ICA40311	Certificate IV in Web-Based Technologies	0.00%	0.00%	12	9	386	1,226	31.48%
CUV40411	Certificate IV in Photo Imaging	0.00%	0.00%	12	8	316	543	58.20%
BSB41515	Certificate IV in Project Management Practice	0.00%	0.00%	12	9	129	1,510	8.54%
AHC50110	Diploma of Agriculture	0.00%	0.00%	12	9	418	982	42.57%
HLT50512	Diploma of Dental Technology	0.00%	0.00%	11	9	284	777	36.55%
HLT42712	Certificate IV in Aromatherapy	0.00%	0.00%	11	8	255	261	97.70%
CPC32413	Certificate III in Plumbing	0.00%	0.00%	11	10	2,811	10,542	26.66%
AUR30312	Certificate III in Automotive Electrical Technology	0.00%	0.00%	11	10	1,123	2,166	51.85%
ACM40412	Certificate IV in Veterinary Nursing	0.00%	0.00%	11	9	1,717	8,860	19.38%
SIS40612	Certificate IV in Sport Development	0.00%	0.00%	10	5	177	253	69.96%
HLT60512	Advanced Diploma of Naturopathy	0.00%	0.00%	10	7	3,056	4,012	76.17%
ICA40811	Certificate IV in Digital Media Technologies	0.00%	0.00%	10	9	205	353	58.07%

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ICA60511	Advanced Diploma of Computer Systems Technology	0.00%	0.00%	10	8	145	230	63.04%
LMT41007	Certificate IV in Applied Fashion Design and Technology	0.00%	0.00%	10	8	494	628	78.66%
MEM50212	Diploma of Engineering - Technical	0.00%	0.00%	10	7	468	831	56.32%
CUA50113	Diploma of Dance (Elite Performance)	0.00%	0.00%	10	5	42	288	14.58%
AUR31012	Certificate III in Automotive Sales	0.00%	0.00%	10	7	588	1,869	31.46%
AHC40110	Certificate IV in Agriculture	0.00%	0.00%	10	8	1,712	1,997	85.73%
AHC31110	Certificate III in Production Nursery	0.00%	0.00%	10	9	92	248	37.10%
HLT51507	Diploma of Kinesiology	0.00%	0.00%	9	8	189	194	97.42%
MEM50105	Diploma of Engineering - Advanced Trade	0.00%	0.00%	9	8	168	391	42.97%
ICA40211	Certificate IV in Information Technology Support	0.00%	0.00%	9	6	27	473	5.71%
ICA40511	Certificate IV in Programming	0.00%	0.00%	9	7	111	735	15.10%
ICA40911	Certificate IV in Digital and Interactive Games	0.00%	0.00%	9	7	155	381	40.68%
ICA41011	Certificate IV in Computer Systems Technology	0.00%	0.00%	9	5	314	492	63.82%
ICT50415	Diploma of Information Technology Networking	0.00%	0.00%	9	7	247	693	35.64%
CUA30113	Certificate III in Dance	0.00%	0.00%	9	3	95	223	42.60%
CHC41112	Certificate IV in Pastoral Care	0.00%	0.00%	9	6	401	414	96.86%
CHC40313	Certificate IV in Child, Youth and Family Intervention	0.00%	0.00%	9	7	301	538	55.95%
RII30913	Certificate III in Civil Construction	0.00%	0.00%	8	6	2,349	10,801	21.75%
UEE50511	Diploma of Electronics and Communications Engineering	0.00%	0.00%	8	7	166	331	50.15%
UEE30911	Certificate III in Electronics and Communications	0.00%	0.00%	8	7	332	927	35.81%
SIT30913	Certificate III in Asian Cookery	0.00%	0.00%	8	6	188	390	48.21%
HLT43212	Certificate IV in Health Administration	0.00%	0.00%	8	8	554	945	58.62%
CUS40209	Certificate IV in Sound Production	0.00%	0.00%	8	8	272	412	66.02%
CPC40912	Certificate IV in Plumbing and Services	0.00%	0.00%	8	7	2,317	4,924	47.06%
CUL40111	Certificate IV in Library, Information and Cultural Services	0.00%	0.00%	8	7	241	534	45.13%
CHC51308	Diploma of Education Support	0.00%	0.00%	8	8	963	1,434	67.15%
FDF30510	Certificate III in Retail Baking (Cake and Pastry)	0.00%	0.00%	8	8	296	491	60.29%
AUR31212	Certificate III in Mobile Plant Technology	0.00%	0.00%	8	6	709	1,968	36.03%
AHC40410	Certificate IV in Horticulture	0.00%	0.00%	8	8	343	517	66.34%
AHC40910	Certificate IV in Conservation and Land Management	0.00%	0.00%	8	8	176	676	26.04%
TLI21810	Certificate II in Logistics	0.00%	0.00%	7	7	148	1,160	12.76%
SIS40313	Certificate IV in Outdoor Recreation	0.00%	0.00%	7	7	452	938	48.19%
SIT20212	Certificate II in Hospitality	0.00%	0.00%	7	6	1	1,234	0.08%
SIT30812	Certificate III in Commercial Cookery	0.00%	0.00%	7	5	79	948	8.33%
UEE32211	Certificate III in Air-conditioning and Refrigeration	0.00%	0.00%	7	7	1,360	3,646	37.30%
SIS50310	Diploma of Outdoor Recreation	0.00%	0.00%	7	7	86	140	61.43%
HLT60712	Advanced Diploma of Ayurveda	0.00%	0.00%	7	5	78	105	74.29%
MEM20205	Certificate II in Engineering - Production Technology	0.00%	0.00%	7	5	102	593	17.20%
CPC50108	Diploma of Building Surveying	0.00%	0.00%	7	6	270	1,715	15.74%

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FNS40215	Certificate IV in Bookkeeping	0.00%	0.00%	7	5	183	3,471	5.27%
FNS41011	Certificate IV in Banking Services	0.00%	0.00%	7	6	249	1,783	13.97%
CHC50512	Diploma of Leisure and Health	0.00%	0.00%	7	6	65	96	67.71%
CUA40313	Certificate IV in Dance Teaching and Management	0.00%	0.00%	7	4	288	396	72.73%
CUF40207	Certificate IV in Interactive Digital Media	0.00%	0.00%	7	7	88	457	19.26%
CUF40407	Certificate IV in Make-up	0.00%	0.00%	7	6	271	311	87.14%
AUR32112	Certificate III in Automotive Body Repair Technology	0.00%	0.00%	7	5	617	1,567	39.37%
AHC10210	Certificate I in AgriFood Operations	0.00%	0.00%	7	5	118	1,854	6.36%
AHC31310	Certificate III in Sports Turf Management	0.00%	0.00%	7	7	286	878	32.57%
SIR50212	Diploma of Visual Merchandising	0.00%	0.00%	6	6	300	480	62.50%
SIS20312	Certificate II in Sport and Recreation	0.00%	0.00%	6	2	0	600	0
UEE62111	Advanced Diploma of Engineering Technology – Electrical	0.00%	0.00%	6	5	430	657	65.45%
UEE60411	Advanced Diploma of Computer Systems Engineering	0.00%	0.00%	6	5	272	335	81.19%
HLT50212	Diploma of Shiatsu and Oriental Therapies	0.00%	0.00%	6	2	81	82	98.78%
HLT41212	Certificate IV in Ayurvedic Lifestyle Consultation	0.00%	0.00%	6	5	59	60	98.33%
ICT40415	Certificate IV in Information Technology Networking	0.00%	0.00%	6	4	11	391	2.81%
MTM30813	Certificate III in Meat Processing (Retail Butcher)	0.00%	0.00%	6	6	1,542	2,904	53.10%
CPC31812	Certificate III in Shopfitting	0.00%	0.00%	6	5	177	779	22.72%
CPC31912	Certificate III in Joinery	0.00%	0.00%	6	4	208	301	69.10%
CHC60112	Advanced Diploma of Disability	0.00%	0.00%	6	5	533	626	85.14%
CHC50708	Diploma of Community Development	0.00%	0.00%	6	5	172	239	71.97%
AUR31512	Certificate III in Automotive Diesel Engine Technology	0.00%	0.00%	6	6	367	407	90.17%
AHC21210	Certificate II in Rural Operations	0.00%	0.00%	6	5	811	3,786	21.42%
TLI42010	Certificate IV in Logistics	0.00%	0.00%	5	5	1,462	1,974	74.06%
SIS20313	Certificate II in Sport and Recreation	0.00%	0.00%	5	4	4,668	9,051	51.57%
SIS30512	Certificate III in Sport and Recreation	0.00%	0.00%	5	1	0	76	0
SIT60312	Advanced Diploma of Hospitality	0.00%	0.00%	5	3	202	216	93.52%
SIT31112	Certificate III in Patisserie	0.00%	0.00%	5	3	54	142	38.03%
ICT40115	Certificate IV in Information Technology	0.00%	0.00%	5	5	66	458	14.41%
MSA10107	Certificate I in Manufacturing (Pathways)	0.00%	0.00%	5	4	276	1,425	19.37%
MSF30413	Certificate III in Glass and Glazing	0.00%	0.00%	5	3	643	1,032	62.31%
ICT50615	Diploma of Website Development	0.00%	0.00%	5	4	34	510	6.67%
FNS20111	Certificate II in Financial Services	0.00%	0.00%	5	5	726	1,044	69.54%
CUV30211	Certificate III in Aboriginal or Torres Strait Islander Cultural Arts	0.00%	0.00%	5	4	22	255	8.63%
CHC50312	Diploma of Community Services (Mental health)	0.00%	0.00%	5	5	47	224	20.98%
CHC50313	Diploma of Child, Youth and Family Intervention	0.00%	0.00%	5	5	482	783	61.56%
FNS40615	Certificate IV in Accounting	0.00%	0.00%	5	5	636	3,148	20.20%
CUA60113	Advanced Diploma of Dance (Elite Performance)	0.00%	0.00%	5	5	48	87	55.17%
AHC51410	Diploma of Agribusiness Management	0.00%	0.00%	5	5	162	471	34.39%

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AUR32412	Certificate III in Automotive Refinishing Technology	0.00%	0.00%	5	4	596	1,427	41.77%
AHC50610	Diploma of Landscape Design	0.00%	0.00%	5	5	82	479	17.12%
CHC40808	Certificate IV in Community Development	0.00%	0.00%	5	4	57	154	37.01%