# Pathways 6 Conference 2002 Conducting ANTA Training Package Equity Evaluations

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#### ABSTRACT

TAFE NSW - Access Division of has been one of five consultancies contracted by ANTA (Australian National Training Authority) to undertake equity evaluations of Industry Training Packages as they are due for review. The evaluations have to consider the accessibility and potential outcomes of the Training Package for members of equity groups. They involve interviewing registered training organisations, trainers and relevant equity groups as well as undertaking a thorough desktop analysis of all documentation (including qualifications, competency standards, assessment guidelines, training materials and professional development materials).

After producing a report the consultant then provides further advice during the revision of the training package. The process requires extensive liaison with the Industry Training Advisory Board (ITAB) to achieve a successful partnership, to produce effective changes to the Training Package.

The issues found varied considerably from industry to industry, especially with regards to disabilities. This paper will outline the process involved and provide examples of issues found along with recommended solutions and outcomes for a selection of varying Training Packages ranging from the Entertainment industry to the Metals and Engineering industry.

If the recommendations of the evaluations are implemented they will provide the basis for a significant improvement in equity in training in Australia.

#### 1. BACKGROUND

Training Packages have provided the framework for VET (Vocational Education and Training) in Australia since 1998. Training packages consist of three parts:

- A set of qualifications ranging from Certificate I level to Advanced Diploma level.
- Industry competency standards.
- Assessment guidelines.

In addition there may be support materials (eg learning resources; language, literacy, numeracy and communication materials).

Registered Training Organisations (RTOs) may deliver training straight from the training package or they may create a "course" that addresses the training package qualification but may contain additional modules to cater for the needs of their target groups. Depending on the industry there may be considerable workplace delivery by enterprise based RTOs or delivery may be more traditional institutional (either public or private) off the job training.

Training package developers have been provided with guidelines which are meant to ensure, amongst other things that equity group needs are addressed. There are sections in the guidelines on:

- disabilities
- general equity issues
- language, literacy and numeracy
- key competencies

Unfortunately, whilst there are guidelines there has been no systematic checking of the first round of training packages to see whether the guidelines had actually been followed. This means that there are now training packages in over 30 broad industry areas (and a myriad of qualifications within them) that are very variable in addressing the needs of equity groups in general and people with disability in particular. This paper discusses the processes now taking place to attempt to overcome deficiencies in existing training packages with particular emphasis on aspects relating to disability.

## 2. ANTA EQUITY EVALUATION SERVICE

In 2000 ANTA released 2 key equity strategy documents, Bridging Pathways (for disability) and Partners in a Learning Culture (Aboriginal and Torres Strait Islander). Both those strategies have as a major aim the increased participation and outcomes for their target groups in VET.

ANTA had earlier established a team of consultants to advise on language, literacy and numeracy in training packages. It wasn't compulsory and wasn't funded directly by ANTA so there was little uptake by ITABs.

As a result of the equity strategies ANTA decided in 2001 to establish an equity evaluation service to review and report on training packages from an equity point of view and to work with ITABs to help implement the report recommendations. This time, however, the service was to be directly funded by ANTA and every training package due for review and revision would be evaluated.

ANTA appointed 5 equity consultants to undertake the evaluations. Access Division of TAFE NSW is one of the consultancies and to date has conducted 4 of the 21 training package evaluations that have been undertaken to date. Those evaluated by Access Division and discussed here are:

- Metals and Engineering
- Entertainment
- Museums and Library/Information Services
- Public Services

The evaluations are undertaken in two stages. The first involves:

- Examining the documentation for equity issues (units of competency, qualifications and assessment guidelines).
- Interviewing industry trainers, RTOs and relevant equity organisations.
- Customising an existing unit of competency as a best practice model.
- Analysing imported (from other training packages) units of competency.
- Examining support materials (eg learning resources).
- Preparing a report with recommendations for changes.

In stage two the consultant:

- Works with the review team to help them implement recommendations.
- Identify and analyse cross-industry units of competency.
- Reports to ANTA on the incorporation of the recommendations.

ANTA provided a checklist which was then expanded by Access Division to use in our evaluations:

- Was there equity representation on the steering committee?
- Have consultations and validations included equity groups?
- Employment patterns in the industry? (ie equity group participation)
- Any barriers for people from equity groups?
- Are skills required to make the workplace inclusive/equitable included?
- Are skills for dealing with equity group members (as clients) included?
- Have communication units been provided for use at a range of levels?
- Are the reading, writing, speaking and listening skills that people have to do to complete workplace tasks clearly described?
- Is the language used enough to convey meaning? (eg is it in passive or active voice?)
- Are all the important terms explained?
- Are the underpinning knowledge and skills specific enough and is there provision for their explicit development of these skills?
- Are the suggested assessment methods appropriate to assess competency?
- Do the Assessment Guidelines include models, examples, options and assistance for the user on ways to make the assessment inclusive and fair for equity groups (eg reasonable adjustment)?
- Is there a Certificate I (entry level) qualification and does it provide a suitable pathway for equity group members?
- Is there provision for customisation of the training package to the needs of equity groups as well as to enterprise needs?

# **3.** CONDUCTING THE EVALUATIONS

Access Division has found that the ITABs it has worked with to be very supportive of the evaluations. We've worked on the basis of cooperation with industry to gain achievable and realistic improvements to the training packages. There has been the odd ITAB that hasn't been so

co-operative for other consultants. Coming in heavy is a last resort option and is less likely to achieve positive changes.

Evaluations start with meetings with the ITAB to get background information and initial issues from the industry's point of view. The equity evaluations run parallel with the main review so if possible we attend a state focus group for the review and have found that many of the issues and concerns raised at the focus groups are actually equity issues so that some recommendations appear in both the main review and our report.

A range of RTOs, both public (eg TAFE) and private as well as enterprise/industry based RTOs are interviewed. As there is no travel budget interviews are by phone or email. Identifying RTOs who actually delivery qualifications isn't always easy as the National Training Information Service (NTIS) only lists RTOs that have a qualification on their profile (list of qualifications that they are approved to deliver) and not those that they actually deliver. RTOs have been very cooperative but many display a remarkable lack of understanding of equity issues (for example one RTO responded that they had a couple of people who couldn't read or write much but they dropped out so it wasn't a problem, whilst another said that they were located up stairs so anyone who had a physical disability couldn't access their training, even if they wanted to).

Draft recommendations are developed and then discussed, either at a training package review steering committee meeting or by circulation for comment. In some cases this has resulted in stronger recommendations where the steering committee have wanted issues addressed more explicitly that in the draft.

The biggest issue in developing recommendations has been to decide exactly where to suggest a particular equity issue is addressed. There are lots of possible additions to each training package but if everything is put at unit of competency level (equivalent to a module in course terms) then the training package will be swamped and most of the extra units will have to be electives and therefore not necessarily used. On the other hand if things are added to more common units at element or performance criteria level (within a unit of competency) then they will have to be addressed. As a result we've only been recommending additional units for selected key issues. Items can be added to the Range of Variables as they are used to explain, enlarge or limit the scope of a unit of competency but it also that means that issues aren't compulsory but can be good for customisation.

Stage 2 of the evaluations coincides with actual revision of the training package and is where the equity consultant works with the revision consultant to provide advice on and negotiate inclusion of the recommendations. Stage 2 is, therefore, the critical stage as it produces the final product. So far we've only commenced stage 2 for one training package (Entertainment) but, largely, as a result of the negotiations the occurred in stage 1 we've found that nearly all recommendations are being implemented.

## 4. EQUITY RECOMMENDATIONS/ISSUES

Recommendations and issues have ranged across the whole spectrum of equity groups and issues but do include a lot of recommendations of relevance to disabilities. The following is a sample of from the training packages reviewed by Access Division.

#### 4.1 Steering Committee Membership and Consultation

The Entertainment training package did have equity involvement in the steering committee and some involvement in consultations, however this was not the case with other packages. The difficulty is who do you get? Some one with a broad equity perspective from within the industry? Someone from outside the industry? We've tended to go for the first and recommend that consultations must include equity organisations, for example, in the entertainment industry groups such as Accessible Arts.

### 4.2 Reasonable Adjustment

Mention of adjustment is very hard to find in any training package and certainly not at unit level, unit level being the only part that some trainers will see. We drafted suggested statements covering each equity area but landed up with more than the main statements so have now come up with a brief statement about catering for the needs of all equity group members for units with a cross reference to detailed statements on adjustment (with examples) for the overall training package assessment guidelines.

#### 4.3 Disability Awareness

Mention of disability awareness whether for colleagues or clients is very rare in training packages. It is a major issue across the Arts/Cultural industries, including both the entertainment and museums/library training packages, particularly at management level. We recommended a unit at Certificate IV and higher levels on making exhibitions, events, catalogues, websites, physical access, marketing etc more accessible. For those dealing with the public in positions such as front of house (Certificates II and III) we recommended inclusion of, for example, appropriate communication skills for providing a service to people with a disability and members of other equity groups.

#### 4.4 Customisation

There has been some customisation of the Metals and Engineering training package for people with disabilities but generally guidelines only talk about contextualisation to the needs of enterprises and not to the needs of equity groups or individuals. We've recommended that guidelines be included for customisation whilst at the same time keeping the integrity of the training package. We've also recommended that examples of "model" programs be provided to demonstrate how customisation for particular equity groups can be achieved, including for disabilities specific practical examples of reasonable adjustment in delivery and assessment.

## 4.5 Delivery of Lower Level Qualifications

It is problem across all training packages that, whilst there are lower level qualifications (either suitable or customisable) little delivery occurs. This was the case in all the training packages that we've evaluated. In the library area most RTOs tend to stick to Diploma level courses but local councils are crying out for training at Certificate II level as they tend to have quite a lot of untrained staff in base level jobs.

As Certificate I and II level qualification provide good entry level skills and pathways for equity groups it is essential that they actually get delivered. In the entertainment industry there are a lot

of organisations focusing on particular equity groups (eg Accessible Arts, Theatre of the Deaf) that are at most semi-professional. Delivery of the Certificate I in Entertainment could provide accredited skills that could lead to paid employment. ITABs need to encourage delivery of all qualifications by RTOs and where possible in partnerships with suitable organisations/enterprises at the lower levels.

### 4.6 Language, Literacy and Numeracy (LLN)

Some training packages are quite explicit with language, literacy and numeracy (eg Entertainment), others make little mention of it (eg Public Services), whilst the Metals and Engineering training package includes separate units. Making essential LLN demands explicit is desirable and should be added at performance criteria and/or Range of Variables level. Separate units are useful provided they can count towards completion and can therefore attract funding for delivery. The Metals and Engineering units don't currently count towards completion and therefore don't get funded so don't get delivered. We've recommended that they contribute towards completion of the Certificate I qualification. We've also recommended that all the training packages make the LLN requirements of jobs much more explicit.

### 4.7 Generic Skills – Communication and IT

Industry advice is that many public service jobs are 50% or more communication but there are only two units of communication in the training package. Similarly in the entertainment industry extensive negotiations have to take place with a wide range of people. Make Up units of competency require negotiation with a range of people including directors, actors, designers and lighting people. There is, however, no unit developing negotiation skills. Strong recommendations have been made in this area for both training packages.

#### 4. 8 Learning Needs

Units where participants can identify and plan their learning needs are absent from most training packages. Quite a few training packages have included this sort of unit of competency and inclusion in all training packages would be particularly helpful in identifying and planning support for equity group members.

The training package for trainers and assessors was reviewed before the equity evaluations commenced, however lobbying has resulted in a unit being added on the accommodation of the needs of learners with disabilities. At the time of writing it is unclear whether the unit will be compulsory or elective. It would clearly be desirable if it was compulsory.

#### 4.9 Inclusive Work Practices

Issues relating to harassment and discrimination tend not to appear in training packages. Recommendations have been made about including suitable elements or performance criteria in both supervision units and in basic units such as "Working with Others"

#### 4.10 Length of Units

Long and complex units can make it difficult for learners with a disability so we've recommended that long units be broken up to make them more achievable.

#### 4.11 Support Materials

Support materials are variable. The entertainment industry, for instance, has communication/literacy materials. Customised materials for particular equity groups would be very helpful, especially for industries employment for people with a disability has good potential. Customised material has, for example, been developed for the metals and engineering training package by Wangarang Industries in Orange.

## 5. CONCLUSION

The equity evaluation process, at this stage, looks likely to have positive effects on both access to training and the quality of training related to training packages. Many of the recommendations made relate to issues that should have been addressed in the original versions of training packages but at least the new versions should be more inclusive, especially by providing clearer advice on reasonable adjustment, customisation and language, literacy and numeracy.

Some recommendations rely on ITABs being proactive after the training package is endorsed. This level of commitment is impossible to build into a training package. There will need to be continued encouragement (pressure?) on ITABs and RTOs to deliver the lower level qualifications that are so valuable as access pathways for members of equity groups.

As the first training packages to have had equity evaluations haven't been re-endorsed yet the real outcomes, successful or otherwise, of the equity evaluation process won't be obvious for another year or so. The evaluations only relate to the actual training packages and we can't guarantee how RTOs and individual enterprises will interpret them. That is more an issue for the Australian Qualifications Training Framework (the AQTF) where guidelines outlining RTO responsibilities for matters such as disabilities and language, literacy and numeracy are being developed. RTOs will have to comply with the guidelines as a part of the registration and audit processes.