AUSTRALIAN INDUSTRY
GROUP

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Di Booker
Director (Policy)
Australian Qualifications Framework Council
GPO Box 9839
Adelaide SA 5001

Dear Ms Booker

The Australian Industry Group (Ai Group) welcomes the opportunity to make a submission the Australian Qualifications Framework (AQF) Council on the development of an Australian VET Graduation Statement.

Ai Group is a peak industry association in Australia which along with its affiliates represents the interests of more than 60,000 businesses in an expanding range of sectors including: manufacturing; engineering; construction; automotive; food; transport; information technology; telecommunications; call centres; labour hire; printing; defence; mining equipment and supplies; airlines; and other industries. The businesses we represent employ more than 1 million employees.

Ai Group's interest in the consultation paper reflects:

- a high proportion of members who employ the graduates of Australian vocational education and training qualifications, and
- the interests of our two registered training organisations, Australian Industry Group Training Services Pty Ltd provider no. 3541 and The Australian Industry Group provider no. 3039.

An Australian VET Graduation Statement that sits alongside the testamur, record of results and possible trade papers, will directly affect employers, as it is likely to be given to employers alongside these documents.

Service to Employers

Ai Group sees that there is some benefit for employers from an Australian VET Graduation Statement. In particular, we see significant benefit for employers by providing information about the licensing and/or regulatory information, which is currently not included on the Testamur or Record of Results. We see that employers will value the licensing/regulatory information as this often differs across states and territories.

We also see value in further information included about delivery of the qualification, for example the use of work placements and use of recognition of prior learning and in particular would like to see the statement, '*achieved through Australian Apprenticeship arrangements*' appear on the VET Graduation Statement.

However we question why a list of units of competency is required when this information is on the Record of Results or Statement of Attainment. Regarding the suggested mandatory field 'information on the endorsement of the training package', we believe this is already provided in the existing certificate provided to graduates. All course codes and titles are listed, which inherently provides the endorsement, and under ASQA transition arrangements the offering must be the most current.

With reference to the Pathways information required under this proposal, Ai Group understands that this information is already provided through a link on the certificate to the Training Package pathways and that this information may not be required on an Australian VET Graduation Statement. However, we believe further investigation is required to see how and if this information is being used and whether other links to pathways are necessary.

Implementation

The quality and consistency of VET qualifications is one of the most significant issues facing the sector at present. Ai Group is supportive of work being undertaken by the National Skills Standards Council to review the standards for the regulation of VET focusing on issues of quality[1]. We see benefits in the AQF Council working with the NSSC to implement the Australian VET Graduation Statement within any new arrangements for the VET sector.

Information to be included by RTOs will need to be verified. With around 5,000 RTOs this is likely to be a significant task (compared to universities and higher education providers). In addition to the scale of verification there is a related issue about the difficulty of verifying some statements. In Appendix B for example, a university as an awarding institution is referred to as "*recognised for excellence in teaching and learning*". According to whom and by what standard? How would such a statement be verified? This would seem to be going beyond descriptive statements. Perhaps this section, along with awards and prizes, is better placed as part of an individual's CV.

The AQF Council should also note that the Nationally Recognised Training (NRT) logo is on AQF Testamurs and Statements of Attainment as a distinguishable mark of quality for promoting and certifying vocational education and training. The AQF Council should consider the relationship between the Australian VET Graduation Statement and the NRT logo and how these brands will sit within a 'new look' VET sector.

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[1] NSSC, 2012 Review of Standards for the Regulation of Vocational Education and Training: Issues Paper, Commonwealth of Australia, Canberra

Issues for RTOs

The current Student Management System used by Ai Group is OZsoft – VETtrak. It would have the capability to handle the additional information outlined as part of the Graduation Statement. Templates currently handle unit listings, hyperlinks and logos. The new statement would add complexity if the addition of information on achievements specific to that graduate, work experience, industry placements, and awards and prizes was implemented. Being individual to each student, entry of this information would require additional administration by the RTO. The paper describes this as a small amount of material that providers would need to customise however we would regard this as being significant and it would be an additional burden on RTOs.

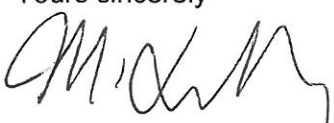
Current Certificate statements can be three pages in length – the statement plus two pages of up to thirty units. With the proposed additional information in the Graduation Statement, it is likely to be the length of a graduation booklet. This could make it more difficult for an employer to locate the core information required to do the job.

Ai Group recommends that the AQF Council proceed with caution as:

- much of the newly suggested information is already contained in the current certificate;
- some of the newly proposed information will be an additional burden for RTOs to collect and verify and goes beyond their ASQA requirements and responsibilities;
- the length of the new statement may take employers' focus away from the core skills and knowledge achieved as required by the Training Package; and
- some of the information appears to be better placed on an individual's CV.

It will be important for the Council to continue to consult with industry and other stakeholders, and work with other initiatives to progresses this. We welcome the suggestion of a number of pilot projects that will test its implementation with a range of Australian employers.

Yours sincerely



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