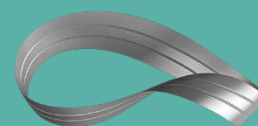

VET WORKFORCE BLUEPRINT CONSULTATION PAPER

ISA SUBMISSION

28 March 2024



INDEPENDENT
SCHOOLS
AUSTRALIA

Acknowledgement of Country

Independent Schools Australia acknowledges the traditional custodians of country throughout Australia and recognises the continuing connection to land, waters and community. We pay respect to Elders past and present, and commit to the ongoing journey of reconciliation.



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1.	ABOUT ISA	4
2.	INTRODUCTION	5
	2.1 RECOMMENDATIONS.....	5
	2.2 VET DELIVERY IN INDEPENDENT SCHOOLS.....	6
	PERCEPTIONS OF WORKING IN THE VET SECTOR	6
3.	CREDENTIAL AND CURRENCY REQUIREMENTS	7
4.	COMPETITION FOR STAFF BETWEEN SECTORS	9
5.	PROFESSIONAL DEVELOPMENT CHALLENGES	9
6.	TEACHING A DIVERSE COHORT OF STUDENTS	10
7.	ADMINISTRATION AND COMPLIANCE BURDEN	12
	7.1 DATA AVAILABILITY AND COLLECTION.....	12
	CONCLUSION	13

ABOUT ISA

1

Independent Schools Australia (ISA) is the national peak body representing the Independent school sector. It comprises the eight state and territory Associations of Independent Schools (AISs). Through these Associations, ISA represents more than 1,215 schools and 716,800 students, accounting for 17.6 per cent of Australian school enrolments, and a workforce of 123,000 people.

ISA's major role is to bring the unique needs and contributions of Independent schools to the attention of the Australian Government and to represent the sector on national issues.

Independent schools are a diverse group of non-government schools serving a range of different communities. Many Independent schools provide a religious or values-based education. Others promote a specific educational philosophy or interpretation of mainstream education.

A number of Independent schools have been established by community groups seeking to meet particular needs or to reflect the religious values of a community. Independent Catholic schools are a significant part of the sector, accounting for eight per cent of the Independent sector's enrolments.

Most Independent schools are set up and governed independently on an individual school basis. More than four out of five schools in the sector are autonomous non-systemic schools. However, some Independent schools with common aims and educational philosophies are governed and administered as systems, for example Lutheran schools. Systemic schools account for 17 per cent of schools in the Independent sector.

The latest available data shows that more than one in six Australian school students attend an Independent school, with more than one in five secondary students attending an Independent school. Students at Independent schools reflect the full diversity of Australian society – including those who experience one or multiple forms of disadvantage. The growth of enrolments in the Independent sector is most notable in low-fee Independent schools.

Most families with children enrolled in non-government schools are middle-to-low-income earners, increasingly from multi-cultural backgrounds, and residing in outer-suburban and inner-suburban communities. Many of these families are facing severe economic stress and are making substantial sacrifices for their children's education.

The Independent sector encompasses considerable diversity in size, location and the types of students in schools. There is a far greater percentage of Independent schools charging less than \$1,000 per year, including those that charge no fees, than those charging over \$25,000. The median fee for an Independent school in 2022 was around \$5,500, and the majority of Independent schools charge annual fees of less than \$6,000.

INTRODUCTION

2

ISA prepared this submission in response to the Department of Employment and Workforce Relation's *Developing a Blueprint for the VET Workforce* consultation paper (the Paper). ISA consulted with the state and territory Associations of Independent Schools (AISs) in preparing this submission.

ISA represents the Independent school sector on national education issues, working closely with AISs to understand opportunities and challenges regarding the delivery of Vocational Education and Training (VET) in Independent schools. This includes workforce challenges, accreditation, careers advice, VET funding, student training costs, and information regarding ongoing and new initiatives across states and territories.

Many Independent schools across Australia offer high-quality VET to senior students, helping to address the national skill shortage.

In September 2023, Jobs and Skills Australia's report¹ found that over the year to May 2023, 91 per cent of total employment growth was in occupations that require post-school qualifications, with over half requiring vocational education and training pathways.

To meet the growth in demand for VET trained workers, it is essential that Australia has a professional VET workforce with the appropriate resourcing and training to position learners for success in their chosen field.

The Paper explores the development of a VET Workforce Blueprint (Blueprint), identifying practical actions at the national, state and territory government and local levels to grow and support the VET workforce. The final Blueprint will aim to outline clear steps to:

- attract people to the workforce.
- retain and develop the current workforce.
- improve VET workforce data.

ISA's submission explores the Blueprint's aims and identified actions, with specific reference to the VET workforce in Independent schools, outlining possible opportunities and barriers.

2.1 RECOMMENDATIONS

To support the development of a high-quality VET Workforce Blueprint which supports delivery in Independent schools, Independent Schools Australia recommends that:

- the barriers to VET workforce participation are reduced by showcasing the strengths of VET in schools to the broader VET industry to address negative perception issues.
- adequate access to VET trainers is required to increase the size of the VET workforce at the required rate to address the national skills shortage.
- the Blueprint include strategies to enhance staff retention for the VET workforce, both in schools and external registered training organisations (RTOs).

¹ [Skills Shortage Quarterly – September 2023 | Jobs and Skills Australia](#)

- barriers preventing VET teachers in schools from accessing professional development opportunities are reduced. These barriers include budgetary constraints, staff coverage issues and senior staff recognition of the different training requirements for VET teachers in schools.
- the Blueprint consider the administrative burden placed on already time-poor teachers, and ensure there are appropriate incentives and resourcing for schools to deliver VET services to their students.
- an ongoing data collection mechanism for the VET workforce is established, though this should not increase the administrative burden on Independent school staff.

2.2 VET DELIVERY IN INDEPENDENT SCHOOLS

VET qualifications are highly valued as they provide young people with educational opportunities to learn important knowledge and develop employment-based skills and certification. The Independent school sector is a key contributor to VET and several Independent schools are RTOs themselves.

Many Independent schools:

- provide vocational education services, training and assessment to their students, and to students of non-RTO schools.
- deliver VET and assessment to their students on behalf of external providers under an auspice arrangement.
- enable and support students to enrol on vocational courses and school-based apprenticeships with external providers and employers.
- provide VET onsite in partnership with an RTO and organise placements for students in external VET courses.
- offer careers advice to students and post-school study and employment options.
- form critical relations with industry and business to ensure robust and engaging VET courses and apprenticeships.

VET is increasingly becoming a focal point for senior students, providing not only transition into apprenticeships and further education and training, but also as entry into university through alternate entry programs, or directly into employment. As a result, a sustainable and high-quality school-based VET workforce is of increasing importance to the education sector.²

PERCEPTIONS OF WORKING IN THE VET SECTOR

3

In Independent schools, the delivery of VET varies significantly. While many schools offer VET programs, some are RTOs and others may access an external RTO provider for their students. Due to these varied approaches to delivery, students' experiences with VET may differ between schools or jurisdictions. As a result, it is challenging to make a general assessment of the perceptions of the VET workforce in schools, as individual experiences may vary.

VET programs in schools have long been subject to perceptions of inferior quality and inconsistent delivery. In 2019, the Australian Skills Quality Authority (ASQA) identified VET delivery in school as a

² [Submission: Inquiry into Perceptions and Status of Vocational Education and Training – Independent Schools Australia \(isa.edu.au\)](https://www.isa.edu.au/submission-inquiry-into-perceptions-and-status-of-vocational-education-and-training-independent-schools-australia)

systemic risk to the quality and reputation of VET. In 2021 ASQA undertook a scoping study to 'analyse issues and risks associated with VET delivered to secondary school students'. The findings of this study found that in practice, there was no higher risk of non-compliance in schools delivering VET program than in the broader VET sector. It also found no evidence to suggest that VET in schools is of lower quality than other VET.³

The source of these misconceptions varies, but some of the perceived issues with VET delivery in schools may be attributed to:

- VET programs in schools historically having been used as a last resort for students considered too difficult or disruptive to keep in the traditional classroom.
- mistaken beliefs that VET operations in schools are a reduced or tokenistic version of the VET offered by standalone RTOs, despite schools still being required to adhere to the same RTO standards as regulated by ASQA or the state specific VET regulator.
- a lack of data on VET delivery in schools.
- school community members such as parents and extended family members having limited understanding of VET.

With the current teacher workforce shortage, attracting teachers with VET qualifications can be challenging. The demand for VET accessibility can be seen across all school sectors and jurisdictions. For example, the Association of Independent schools NSW (AISNSW) operates as an RTO, offering VET courses to Independent NSW schools. In the past nine years the number of AISNSW's VET partner schools increased from 85 to 133 and student participation numbers have more than doubled. To meet this steep increase in demand, there needs to be a commensurate increase in staff qualified to deliver VET in schools.

ISA supports measures which would improve the perception of VET in schools, and consequently attract additional skilled professionals to the VET workforce. It is pleasing to see that the status and perception of VET is changing, with less focus on Australian Tertiary Admission Rank (ATAR) as the only senior schooling option and an increase in the exploration and take-up of non-ATAR pathways.

In addition to building industry specific skills for participating students, some VET courses also contribute to a student's ATAR score. These changes means that more students are taking advantage of the many opportunities that VET school pathways can provide.⁴

CREDENTIAL AND CURRENCY REQUIREMENTS

4

ISA supports the Skills and Workforce Ministerial Council investigation of ongoing VET reform to address the quality and industry relevance of training and the integrity of providers to strengthen the VET sector.

A clear and consistent set of qualification requirements for the VET workforce is needed to ensure that the provision of VET programs is both high-quality and adequately staffed.

³ [VETDSSS Scoping Study - ASQA, 2021, pg. vii](#)

⁴ [Looking to the Future: Report of the Review of Senior Secondary Pathways into Work, Further Education and Training - Department of Education, Skills and Employment, 2020](#)

ISA notes that the Qualification Reform Design Group, established by the Skills and Workforce Ministerial Council, has delivered its initial advice with recommendations to modernise Australia's VET qualifications and move away from a one size fits all model.⁵

In particular, ISA supports strategies that:

- encourage quality teaching and learning by reducing the overspecification that contributes to compliance overload in delivery and assessment, leading to better learning experiences and outcomes.
- improves the status and responsiveness of the VET sector by retaining what is working while generating new models for use across sectors, with appropriate oversight to maintain trust.

Currency requirements are an important pillar of VET delivery, as VET trainers need to meet industry standards and prepare learners with practical and relevant skills.

There is general support from the Independent sector for the Department of Employment and Workplace Relations' early changes to the current RTO standards.⁶ Enabling teachers with an education degree with the appropriate vocational competencies and industry skills and knowledge to be engaged as trainers and/or assessors is a positive step, though one AIS raised concern that this might increase competition for VET trainers between schools and VET providers.

Recently, the main barrier to offering VET programs in schools is that teachers required an accredited VET qualification, as well as teacher registration in the appropriate state or territory. As a result, many schools were unable to offer VET programs to students, as their teachers did not hold the necessary qualifications. This is despite many teachers already being dual professionals, with experience as both industry professionals and qualified educators.

Due to these requirements, many Independent schools offer VET courses through external RTOs. Though this may broaden opportunity and course selection, it is not always ideal, as students attend the RTO offsite and study in an adult-centred environment. For external RTOs, it can be difficult to find VET trainers that have an understanding of working with school-aged students, who may require more support compared to adult learners.

A key barrier to expanding the VET workforce is the limited access to qualified trainers who can administer VET trainer qualification programs such as the Training and Education Package (TAE). According to industry professionals, following COVID-19 many VET trainers returned to their professional fields, resulting in less opportunities for teachers in schools to gain their VET qualifications and creating challenges for external RTOs seeking to employ staff.

The loss of trainers to industry roles has also impacted the number and range of VET courses being offered in schools, with AIS South Australia (AISSA) reporting that some South Australian schools are no longer able to meet student demand for VET classes.

⁵ [Qualification Reform Design Group - March 2024 update - Department of Employment and Workplace Relations, Australian Government \(dewr.gov.au\)](#)

⁶ [Early Changes to the Current Standards for RTOs - Department of Employment and Workplace Relations, Australian Government \(dewr.gov.au\)](#)

COMPETITION FOR STAFF BETWEEN SECTORS

5

Any changes to the requirements for VET trainer registration need to consider the impact on broader workforce issues in the education sector. Schools are experiencing a current shortage of teachers which will be further exacerbated as retirement rates in an aging teacher workforce increase over time.⁷ To ensure a stable professional workforce of both school teachers and VET trainers, consideration will need to be given to how each profession attracts and retains staff.

The primary source of competition in the VET workforce comes from staff returning to their industry profession. This can be driven by higher salaries and reduced registration and professional development requirements in industry roles when compared to VET trainer positions. TAFE and other RTO providers may pay higher salaries than school-based VET roles and offer ongoing full-time roles, further reducing incentives for VET trainers in schools.

Some schools may only be able to offer part-time work to VET trainers with teacher registration, resulting in further financial disincentives and difficulties in attracting VET staff in schools.

AISs support the reduction of barriers impacting the delivery of VET in schools and establishment of easier pathways to recognise teacher's educational attainment and industry experience. This would increase the opportunities for schools to deliver VET courses by leveraging the existing skill sets of the teaching workforce.

Some in the Independent sector have expressed concern that if qualified teachers with minimal training transition to the VET workforce, this may result in increased competition between schools and external RTOs, putting further pressure on the capacity for schools to deliver VET alongside their core curriculum.

The Independent school sector recognises the value of VET trainers in school-based RTOs, as they know the students and have experience teaching school-aged students using appropriate developmental teaching approaches. To increase the number of staff able to deliver school-based VET, measures to recognise the existing skills and experience of the teaching workforce undertaking VET trainer registration are welcomed.

PROFESSIONAL DEVELOPMENT CHALLENGES

6

To maintain the integrity of VET delivery in Independent schools, teachers require the time and financial support to pursue professional development opportunities, both mandatory and optional.

Every Independent school has a budget for staff professional development. The many demands on this budget mean that schools must be strategic in how professional development costs are allocated. Professional development may be used for whole school approaches such as curriculum development, student support and welfare, leadership courses, or for compliance and individual staff needs.

Teachers delivering VET courses in a school-based RTO must undertake VET specific professional development to keep their industry knowledge up to date, in order to maintain their currency and

⁷ [Practical ideas to address Australia's teacher shortage](#) – Universities Australia, 2022

experience. This often requires specific training to maintain currency, which may not be within the school's budget, impacting time out of school and increasing financial constraints.

With the current teacher workforce shortage, many Independent schools are reporting that releasing staff to attend professional development sessions is challenging, as there is not sufficient relief staff to teach classes if regular staff are absent.

Many AISs develop professional learning programs for VET teachers in schools, but currently report that there is little uptake of face-to-face sessions due to teachers not being released from their teaching duties. AISs are responding to this by developing courses designed for online delivery, but recognise the need for face-to-face opportunities to support teachers in maintaining currency and meeting assessment standards.

After teachers have completed their TAE (Certificate IV in Training and Assessment) they still require ongoing support, as VET assessment and compliance requirements are very different to the approaches used in schools.

Independent schools often require support from their AIS to access VET specific professional development opportunities. The following provides examples of support:

- AISNSW operates as an RTO and supports Independent schools to maintain currency and qualifications for 420 VET trainers.
- Independent Schools Queensland (ISQ) use an RTO with an accelerated teacher program which takes into account the skills and knowledge included within the required education degree(s). This is a five-day training schedule over two terms, including self-paced study qualifying 20-30 VET teachers every year to deliver VET in Queensland Independent schools. These schools include 43 school RTOs and 178 schools who deliver VET under 'auspice' type arrangements. ISQ conduct termly assessment validation events.
- Independent Schools Victoria (ISV) provides online professional development, as well as on site consultation in schools and face-to-face sessions at ISV. The 63 schools in Victoria teaching VET are supported by ISV and the Victorian Curriculum and Assessment Authority VET unit.

TEACHING A DIVERSE COHORT OF STUDENTS

7

Independent schools are committed to improving educational opportunities for all young Australians. They play an important role in educating priority equity cohorts and students experiencing disadvantage, including those most at risk of permanently disengaging from the education system.

Families and students in a wide range of communities are supported by Independent schools. Many students from regional and remote Australia are educated in Independent boarding schools and Majority Aboriginal and Torres Strait Islander schools.

Independent special assistance schools play a critical role in educating students who have not been successful in mainstream schools. They transform young people's lives by facilitating flexible pathways to employment or further educational outcomes.

Independent schools value student-centred learning and seek to implement practical, sustainable practices to personalise and differentiate learning to adapt to individual students' needs, interests, and strengths. The multi-tiered system of supports (MTSS) approach is embedded in many Independent

schools, monitoring student progress and providing targeted intervention as required.⁸ This promotes student engagement in learning and leads to better student outcomes.

VET trainers in schools are experienced in teaching a diverse range of students. They may know students from other subjects they teach and have access to school-based student data to identify if a student is on an Individual Plan to meet any additional needs or make necessary adjustments to support learning outcomes. Teachers in schools also have experience in working with students with disability and often receive cultural competency training to support Aboriginal and Torres Strait Islander students and their families.

Schools that offer VET courses through external RTO providers work closely with each provider to make sure that the needs of each student are understood and supported as much as possible.

As VET courses are often seen as an alternative option to reengage students in education, they can attract diverse students. This can be very challenging for VET teachers just out of industry who have not worked with school-aged students before or with students with challenging behaviours or needs. Conversely, VET teachers in schools may not have currency of industry experience and need to learn a new competency-based assessment methodology.

In South Australia (SA), the VET in Schools policy was introduced at the end of 2020.⁹ The policy is focussed on addressing areas of skills shortage and restricts access to students in government schools to VET courses that align with identified skills areas and that are delivered through approved RTO's. The primary emphasis and funding for VET in Schools programs is for full qualifications that lead directly to employment outcomes. Little has been put in place for students who do not yet have the skills and ability to cope with this level of study, or students in lower years who are not eligible to access the funding.

While SA Independent schools have the flexibility to access any qualification and use any RTO provider of their choosing, the fact that these providers cannot offer their courses to government schools unless it is an identified skills gap can make some courses unviable for the RTO. This well-meaning policy has had adverse impacts in that the opportunities for students to complete a VET qualification in their area of interest is greatly diminished. This means that students who are not engaging in mainstream school or VET programs are further marginalised. Opportunities for suitably qualified teachers to deliver VET in schools is also heavily restricted, again limiting what can be delivered and these students are now missing out.

In Victoria, all three schooling sectors work together as a VET cluster. Student cohorts are reported to be increasingly diverse and many special assistant schools are enrolling students that have not achieved success in mainstream schools. Over the past 2-3 years some Victorian RTOs have noticed there are more VET students with significant challenges and adverse behaviours enrolling in their courses than was previously the case.

In Independent special assistance schools, VET is seen as a prime driver for student engagement and confidence building, encouraging students to continue with their education, or to find employment pathways post school. VET teachers working with students in these schools should understand their diverse needs and be able to develop positive relationships.

Special schools for students with disability in the Independent sector also offer VET courses and work closely with industry. It can be complex for VET providers to be able to offer courses to students with diverse needs however it is essential that all courses are inclusive as this can enable young people to go on to further study or employment and live fulfilling independent lives.

It is important to note that not all students who choose VET do so because it may have more practical application, nor do they choose a VET course thinking it has less academic requirements. An increasing amount of teachers, students and their families highly value VET as providing critical life skills,

⁸ [AERO – Introduction to multi-tiered system of supports \(edresearch.edu.au\)](https://edresearch.edu.au)

⁹ [VET for School Students - Government of South Australia, 2020](#)

communication skills, responsibility skills, employability skills and engagement with the world of industry prior to leaving school.

ADMINISTRATION AND COMPLIANCE BURDEN



The provision of VET programs in schools requires continuous and ongoing work for school staff. In many Independent schools, VET coordinators are required to:

- supervise students undertaking VET courses.
- coordinate work placements.
- ensure teachers are maintaining their industry currency.
- monitor compliance with RTO delivery requirements.
- liaise with government authorities on changes to VET programs.

Often VET coordinators are VET teachers themselves, and they may also have classes in other subjects. This can be challenging with the additional responsibilities and compliance burden required of VET delivery and oversight.

In schools delivering high-quality VET programs, success is often attributed to the efforts of an individual staff member, coordinator or principal.¹⁰ The additional workload required when schools introduce VET programs is often the responsibility of the VET coordinator or a teacher rather than administrative staff. This can create disruption of VET program delivery if key staff leave or are absent for long periods.

In line with industry developments and course design, changes to VET material, assessments and course structure occur over time. In schools, these changes can require significant time and cost to implement. Unlike standalone RTOs with administrative support staff to assist, in schools the burden of implementing these changes often falls on the responsible teacher or coordinator.

The Independent sector is concerned that timetabling constraints in schools impacts adequate time for students to develop the practical vocational skills associated with each of the progressive qualification levels. As a result, this may place a disadvantage to learners acquiring the required knowledge and skills in schools and heighten the pressure on teachers to deliver qualifications in unduly short timeframes.

To address the challenges facing the VET workforce, the Blueprint will need to consider the administrative burden placed on already time-poor teachers and ensure there are appropriate incentives and resourcing for schools to deliver VET programs to their students.

7.1 DATA AVAILABILITY AND COLLECTION

Independent schools are already required to undertake a substantial amount of data collection, therefore any additional VET data collection request should consider the administrative workload that Independent schools face.

The most recent comprehensive data on the VET sector comes from the National Centre for Vocational Education Research's (NCVER) report *Understanding the Australian vocational and education training*

¹⁰ [VETDSSS Scoping Study, ASQA, 2021](#)

workforce, which was released 15 April 2020.¹¹ Any possible changes to the broader VET workforce due to the impacts of COVID-19 or the domestic economic slowdown which followed this report's release are largely unknown.

Prior to NCVET's report, the last study on the VET workforce was completed in 2011 by the Productivity Commission. There is no consistent, ongoing collection of data on the VET Workforce.¹²

While some AISs undertake their own data collection on VET in Independent schools, the lack of industry wide consistent data prevents schools from making informed decisions on VET delivery.

ISA would welcome systematic data collection on the VET workforce but cautions against placing extra administrative burden on teachers and schools. For this to be achieved in practice, further investment from government into understanding the VET Workforce would be required.

CONCLUSION

9

ISA's submission highlights the challenges facing the delivery of VET in Independent schools, including workforce challenges, staff skills accreditation, and VET funding. The submission also discusses the difficulties of attracting and retaining VET staff in schools, the need for professional development, and the challenges faced when teaching a diverse cohort of students.

The recommendations included in this submission support the development of a high-quality VET Workforce Blueprint, including reducing the administrative burden on teachers, establishing an ongoing data collection mechanism for the VET workforce, and showcasing the strengths of VET in schools to the broader VET industry.

ISA is committed to improving educational opportunities for young Australians and recognises the value of VET in providing critical life skills, employability skills, and engagement with the workforce prior to leaving school.

ISA would be happy to discuss our submission or be involved in further consultation.

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¹¹ [Understanding the Australian Vocational Education and Training Workforce](#)

¹² [A Clearer Picture of Australia's VET Workforce](#)