

Position Paper “Stronger by Design”

ACEVic

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ACEVic is concerned at the increasing levels of confusion and anxiety across Learn Local organisations regarding the implementation of the PQF+ (Stronger by Design). We believe that this situation stems from a disconnect between the strategic intent of the model endorsed by the ACFE Board in October 2021 and the artefacts and approaches currently being developed for the PQF+ implementation.

As the peak organisation for the Learn Local sector in Victoria, we seek to bring this to the attention of the ACFE Board and with it our intention to support the Board to restore alignment between the PQF+ initiative and its original strategic intent.

Background:

1. In October 2021 The ACFE Board adopted “Stronger by Design: a new pre-accredited provision model.
2. This followed dedicated work from the Board’s Our Learners Steering group, the Department and consultation with providers.
3. Following endorsement by the Board, the model was presented to the sector in a series of regional forums across the state. The model was presented in a PowerPoint.
4. Key messaging from the Board to the sector via these regional forums included reassurance and a commitment to building on existing strengths of the PQF endorsed in 2013, and retaining all the prevailing unique features but with a stronger focus on core skills and LLNED within the context of adult learning principles.
5. Hexagons were used to illustrate the revised model, six in all. These captured the key strategic priorities sought in the Stronger by Design model, listed in the model as:
 - Flexible, place based
 - Learner centred program streams and progression
 - Different delivery approaches
 - More varied learning environments
 - Stronger partnerships, pathways and linkages
 - A contemporary quality framework

It was also a critical measure of the success of the model that it had the capability to meet the unique needs of Koorie and CALD learners.

Where we are now:

6. A key component in the development of the final framework (based on the endorsed model) was that it was tested and evaluated by the sector, and that sector feedback be incorporated into the framework. The understanding of the sector was that this was an integral part of ensuring the revised PQF would work, and sector feedback would be incorporated into future implementation.
7. Whilst we know that this process has been comprehensive, we believe it has also come from a base that has been prescriptive in the way sector responses have been sought and has resulted in these responses being contextualised in a way that positively reinforces the proposed framework rather than genuine, fulsome and expert responses.
8. The evidence of this lies in the current and significant levels of unrest that prevail in the sector regarding the implementation of Stronger by Design.
9. Whilst the endorsed model articulated the importance of LLNED and the capacity of the model to support learner progression in LLNED, our member feedback is that the pilots have focused entirely on LLNED, thus minimising skills and learning domains previously also prioritised within the PQF.
10. We acknowledge the importance of LLNED as an important component of the Stronger by Design original and Board endorsed model, but we also believe that the current singular focus has resulted in other very important elements of the model being minimised. For example, vocational and work readiness skills which have always been a crucial element of pre-accredited training have now seemingly been overwhelmed by LLNED requirements and so we believe that learners who are not interested, motivated or need LLNED skills but rather want work, are overlooked.
11. It is difficult to see how there can be a flexible, bespoke and nimble response to industry need, (as articulated in the 2019 Ministerial Statement and the Board Strategic Plan) if the proposed administrative requirements for delivery remain unchanged.
12. The removal of vocational skills as an ACFE category has meant that partnerships with local employers are now defined by the LLNED needs of the learner, rather than equally meeting skills gaps that can ensure employment. ACEVic is aware that this is a major concern to particularly regional providers who operate in the context of local and specific skills shortages and low employment opportunities.
13. We believe that the focus on the original four streams categories as set out in the ACFE Board Strategic Plan 2020-2025 quadrants was a powerful acknowledgement of the sectors capabilities, but it is difficult to see how these expectations are being met within the PQF+

roll-out so far. Feedback suggests that the pilots do not focus on the streams endorsed by the Board. Streams in the four quadrants are 1) *Building confidence and skills for participation in education and training* 2) *Supporting successful attainment in accredited training*, 3) *Building confidence and skills for participation in work* and 4) *Upskilling and reskilling vulnerable workers*.

14. The emphasis, as articulated strongly by providers in the original consultation and articulated unanimously during this initial consultation with Dr Dahle Suggett and Peter Cole from PTR Consulting was that any new model must have an increased involvement by learners in the determination of their learning gain. Learner gain stages were articulated as 1. *Developing learners*, 2. *Confident learners* and 3. *Established learners*. It is difficult to see how in the current articulation of Stronger by Design that there a workable methodology that supports this learner led approach given the administrative overload that such a process, if it is to be critically achieved, can work.

ACEVic's position:

ACEVic fully supports and welcomes the 2021 decision of the ACFE Board to modernise, refresh and strengthen the Preaccredited Quality Framework. The consultation with providers and the endorsement of the Stronger by Design model were indicators that the sector's capability to engage, support and retain vulnerable learners to achieve their learning goals was recognised as playing a unique and specialised role in the Victorian post secondary landscape. In other words, Learn Locals fill the gaps that other providers are not able to fill, and achieving learner success and progression in ways that other providers are also not able to do.

ACEVic believes, even though the levels of anxiety and confusion in the sector are high, that Stronger by Design can provide quality outcomes for learners. However, three important considerations we believe would be in the Boards interests to address:

1. We respectfully ask the Board to examine whether the current PQF+ artefacts and approaches reflect the original strategic intent of the Board as articulated in October 2021. The position of ACEVic is that they do not, and we maintain that in the development of the PQF+ that the original, focussed, strong strategic intent of the Board is potentially jeopardised.
2. We also maintain that communication with the sector would seem to be inadequate, if the levels of anxiety and confusion are to be regarded as evidence. A revised communications plan could significantly allay sector concerns and mitigate the unanswered questions that are currently contributing to this unrest.
3. To our knowledge Koorie learners and their Communities have not been consulted about the model and the PQF+ or invited to trial or test them, despite Koorie participation and outcomes being a Ministerial and Board priority, and despite successful outcomes for Koorie learners being a key strategic priority in the development of the model endorsed by the Board.



ACEVic offers our support to the Board to assist in whatever way we can. We understand that the development of the PQF+ is not the work of the Board but ensuring that it aligns with the Board's strategic priorities and managing associated risks that come with the development of the PQF+ is an important responsibility of the Board.

We respectfully draw your attention to these matters.