

Ms Jenny Macklin
Chair
Skills for Victoria Independent Review

July 5th, 2020

Dear Ms Macklin,

Adult and Community Education Victoria (ACEVic) appreciates the opportunity to provide feedback to the Skills for Victoria's Growing Economy Issues Paper. We would welcome the chance to discuss these issues in further detail. Our aim is to continue to strengthen the provision of adult and community education within the Victorian post-secondary education system.

This submission reflects ACEVic's perspective on current practices and issues faced by the sector. It also incorporates feedback provided by our member Learn Local (LL) organisations.

ACEVic is the peak policy, advocacy, and information body for the Adult Community Education (ACE) sector, representing Victoria's Learn Local organisations. ACEVic's purpose is to advocate for and support our members to provide high-quality, innovative, and responsive adult education programs that improve the educational, economic, and social prosperity of individuals and communities.

ACEVic is proud to represent and support community-based and managed LL organisations, providing education and training to promote engagement and pathways for learners. ACEVic works to ensure Adult and Community Education is accessible to all Victorians. We are committed to increasing levels of educational attainment throughout Victoria. Our work with LL organisations is undertaken with respect and integrity, supporting providers in the delivery of quality and innovative community-based education.

Yours sincerely



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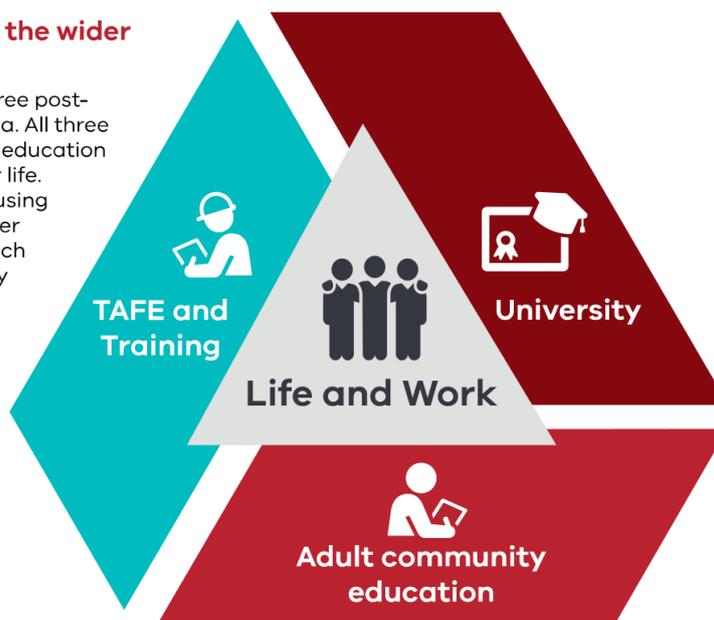
Submission by ACEVic on behalf of our members to the Skills for Victoria’s Growing Economy Review

We commend the Victorian Government for commissioning this timely review of the Victorian training and adult education sector. Representing the adult community education sector, ACEVic supports the concept of three post-compulsory education sectors identified in The Future of Adult Community Education in Victoria 2020-25, Ministerial Statement. It is vital to retain the recognition in the Ministerial Statement, that Learn Locals are public providers complementing TAFE. Victoria is unique in its support of the adult community education sector, which expressly supports learner success when they enter other sectors to continue their learning journey. This should be recognised and celebrated.

Much work is needed to appropriately recognise and position the adult community education sector as a vital element of Victoria’s ability to engage and transition adults through education and training. This is critical to facilitating improved life outcomes and supporting the health of our economy and communities.

Adult community education in the wider post-secondary system

Adult community education is one of three post-compulsory education sectors in Victoria. All three offer Victorians the opportunity to gain education and skills for work, further study and for life. All three play complementary roles, focusing on different aspects of further and higher education. Victorians may engage in each sector at different points in their journey of lifelong learning, and not necessarily sequentially. They may also engage in more than one sector at once, such as with the adult community education sector to support their successful attainment in TAFE and training.



ACEVic's summary of recommendations

1. To understand local and regional jobs and skills needs, obtain more nuanced and qualitative local intelligence from Learn Local organisations. By their very nature, Learn Locals have close contact with local sources of information about community, labour market and specific industry needs. These insights will complement the department's quantitative data.
2. LLs and TAFEs need to work together. There will always be an asymmetric relationship between a large TAFE organisation and small LLs. Both need to commit to working together. Too often, relationships only develop between committed individuals, rather than being driven by the Executive. LL employees embedded in TAFEs – ideally within the Jobs and Skills Centres – would be able to broker opportunities and partnerships.
3. Funding rates are currently based on the Government's assessment of supply and demand indicators: they should be grounded in evidence-based, true cost of delivery calculations, indexed to CPI rises. Funding rates should consider the general inability of disadvantaged LL cohorts to pay tuition fees. Funding should also take into account the associated costs of compliance; design and development; trainer professional development; learner support; and corporate support expenses.
4. The most vulnerable and disadvantaged learners need funding rates that will provide levels of support to enable them to engage with education. This means building fundamental language, literacy, numeracy and digital skills and support to overcome barriers to participation in education and training.
5. The Skills First Reconnect program (Reconnect) is a vital program for LLs. It enables LLs to provide critical wrap-around support for vulnerable and disadvantaged learners facing multiple challenges to engage in and complete an education program. LLs also have many learners requiring high levels of support and intervention, but who are ineligible for Reconnect. The community service LLs provide to the most vulnerable learners should be recognised through a community service obligation fund similar to TAFE.
6. LLs support long planning cycles, particularly if registered with the VRQA. It is critical that major decisions, such as when a course is capped, are communicated well in advance to enable LLs to prepare for change and avoid sometimes catastrophic impacts on revenue.

7. The process for adding qualifications to funded scope needs to be more transparent and reliable to support LLs to be agile, flexible, and responsive to local training and employment needs.
8. The LL sector should be involved in constructing the approach to reviewing and auditing the quality of our program provision. This will ensure the approach incorporates understanding of the significant outcomes we achieve with our learners to complement the business process/transaction audits. This will – provide a more compelling story about what we do; the quality of our education and training, and the contribution we make to achieving government objectives. This would support the development of a culture of quality, leading to richer outcomes – not just transactional compliance.
9. Make publicly owned TAFE facilities available to publicly funded community education providers.
10. Remove the profit motive from post-secondary education. In line with the school and TAFE sectors, adult and community education and training should be delivered by not-for-profit organisations.
11. Establish a process for sharing the cost of developing quality teaching and learning resources for courses that we commonly deliver. This will achieve significant savings by avoiding funding of duplicated effort in the development of course resources and assessments. Basic resources could be developed in common and then contextualised by individual providers.
12. Review the up-skilling eligibility and two-course rules, particularly for Foundation learners. Upskilling is not appropriate for some learners. For example, career changers may need to do another Certificate III in a new industry to secure employment. It is not always appropriate for a learner to transition to a Certificate IV or Diploma and requiring them to do so runs counter to how the workplace works in relation to AQF levels.

Economy and Society

How do you predict which occupations are most in demand in your area? How do you use this information when planning your courses?

The ways in which regional occupations in demand are predicted vary between LL organisations. LLs that are also Registered Training Organisations (RTOs), will be informed by the Department of Education and Training (DET) *Jobs Training and Needs Reports*, which summarises skills and training needs by regions. These reports provide insights into labour market trends and indicate future training needs for specific occupations.

LL RTOs have strong industry links, developed through industry consultation processes and student work placements in industry. These partnerships provide LL RTOs with indications on employment opportunities and vacancies within their region. Regional demands vary and this local lens is important to ensure training is industry relevant and prepares learners for local jobs.

LL RTOs use the Skills First funded list and the number of allocations for funded accredited delivery to finalise program delivery plans. Occupations identified as local skill shortages and where true job opportunities are drive course scope decisions. Course delivery is aligned to the employment growth and job vacancy demands as indicated in the *Jobs Training and Needs Reports* (JTNR) and labour market analysis data. However, sometimes local intelligence is at odds with the JTNR – we believe it would be useful for a mechanism to be established to provide that qualitative and more nuanced insight to the Department and the ACE sector.

Non-RTO LLs rely on local industry and community links to monitor employment trends aligned to their learner cohorts. They tend to have strong links with community service agencies. LLs are often well connected with local employers who provide their learners with work experience opportunities. It is through these types of channels that they gain information on local job vacancies and industry intelligence. LLs provide place-based education and training; they are immersed in their local communities and commonly receive calls from local employers looking for prospective employees.

Consultation with local businesses informs the planning for delivery of both accredited and pre-accredited programs. Work placement opportunities, links with industry and industry consultations informs the development and delivery of all programs. Pre-accredited training programs are designed to meet the needs of learners within the community and industry.

How are changes to work, the economy and society affecting what courses you deliver, and how? What will be different in 10 years?

LLs contribute significantly to the provision of education and training for vulnerable learners, the unemployed, the disadvantaged and workers in low skilled jobs. As work demands change, the adult and community education sector will continue to tailor its delivery to meet the needs of vulnerable learners. LLs are skilled in delivering foundation qualifications for students with learning disabilities and learners with low literacy and numeracy levels. Culturally and linguistically diverse (CALD) learners are well supported by community-based learning, and English as an additional language training, which assists these learners to transition into vocational training and employment. LLs play a valuable role in supporting new arrivals from refugee and migrant backgrounds to settle into their new lives in Australia.

In response to the current reform of the Victorian adult and community education sector, over the next five years, pre-accredited program delivery will focus on literacy, numeracy, digital and employability skill development. ACEVic and its membership fully support the hope that there will be an increase in partnerships between TAFEs and LLs, resulting in the co-design and development of programs to benefit both LL and TAFE learners. This collaboration will enhance learner success and course completion rates and improve employment outcomes.

The additional support through adult and community education and the development of literacy and numeracy skills will increase employment and further study opportunities, benefitting individual, community, social and economic outcomes. For some time now, LLs have delivered digital skills development programs to learners with low educational attainment through pre-accredited delivery. Over the next ten years, this capacity to build digital skills, particularly with low-skilled workers, will be crucial.

Accredited training delivered by LL RTOs will adapt with changing labour market trends and the ever-increasing need for employees to hold vocational qualifications as they navigate multiple career changes and immersing occupations. Qualifications in technology, community services – aged care, disability and children services, and other service industries, will be in high demand.

How are you working within your local community to offer learning and employment opportunities to vulnerable Victorians?

As community-based education providers, LLs are immersed in their local communities. LLs cater for Victoria's most vulnerable learners and the warm, welcoming, accessible learning environments attract the most isolated and disadvantaged community members. LLs maintain complex referral networks with a broad range of community welfare support agencies. These can include, but are not limited to: housing, mental health, drug and alcohol, domestic violence, wellbeing and psychological support, health as well as partnerships with employers, industry, Job Active agencies, Disability Employment Service providers, TAFE and the LL Neighbourhood House networks. These relationships are often based on two-way referral relationships.

Many LLs deliver programs in partnership with community agencies, offering low cost vocational education pathway programs, and literacy and numeracy programs to Victoria's most at-risk learners. LLs frequently work within communities of practice with other LL organisations, sharing resources and expertise to best serve their learners and communities.

Governments

What is your experience of the Skills First reforms?

The introduction of the Victorian Guarantee in 2009 not only resulted in an increase of funded RTOs into the market, it also caused considerable dislocation to LL RTOs. The introduction of the Skills Victoria Training System (SVTS) reporting requirements caused significant disruption for some LLs, who were overwhelmed by the changes and consequently we witnessed a steady decline in the number of LLs. The additional expense associated with the student management system also forced some LLs to stop delivering pre-accredited training.

The heavy compliance burden, along with the frequent contractual changes, and time and money spent interpreting the changes and understanding the funding contract, continue to pose many challenges for LLs. Despite the introduction of the Quality Improvement Program (QIP) in some regions, the feedback has been mixed as to their value, given that the officers in place, frequently, do not have sufficient breadth of knowledge to meet the needs of the RTOs. LLs are small organisations with limited resources and economies of scale making it challenging to support appropriate capacity and capability to manage compliance. Often, they simply cannot afford the allocation of a specialised compliance manager role. LLs ability to afford this function out of existing course funding income is being further challenged each year as student contact hour funding remains static and fails to keep up with CPI rises in associated costs.

The negative changes and/or lack of CPI increases to the student contact hour funding rates challenges all RTOs, particularly those with small scopes of registration. LL providers, who run on limited funds and small cash reserves, have been severely impacted by these changes, which often happen with little notice.

Reduction or capping of funded place allocations for accredited qualifications can result in programs being scrapped at short notice, affecting revenue, resources, trainer's workloads, individual and community needs as well as the LLO RTOs sustainability plans. An example has been the recent capping to the Certificate III in Education Support qualification, which is a qualification that is mostly delivered by LL RTOs. Capping these qualifications, which have successful transition to employment rates in local contexts, has significantly affected several LL RTOs' viability, particularly if it is one of two-three courses they have on scope. Because of regulatory delays, LL RTOs who are with VRQA must work on a 6-9 month planning cycle. Consequently, a decision to cap a certain qualification with little notice leaves a LL without a key revenue stream for 6-9 months. This becomes very problematic when the Department does not open the process for new courses to be put on funded scope during the year. The process for adding courses to funded scope, if it is not on scope by September/October when delivery plans for the forthcoming year are submitted, is highly uncertain.

The eligibility restrictions and low numbers of exemptions available continue to be a problem for providers. Many learners have been left ineligible for accredited training due to inappropriate course selection, poor quality teaching, questionable resources and facilities, and unethical student recruitment practices. We are experiencing the ongoing fall-out from the sorting with continued presentation of learners who are ineligible for a Certificate III because they have a worthless diploma. Some LLs have reported learners coming to them to complete a Certificate III to learn how to do the job. This is after they have completed a Diploma through a local TAFE, but they do not have the work experience to warrant a job at Diploma level and are subsequently unable to gain employment through the Diploma.

How could they be consolidated into a sustainable plan for education and training?

The LL sector needs better exposure and recognition for the vital role it plays in the post-secondary system and for the unique support it provides for Victoria's most vulnerable learners. Exposure in the marketplace should clearly demonstrate how LLs complement TAFE and in fact contribute to TAFE success, for example by preparing learners to commence and complete a TAFE qualification. Despite a couple of marketing programs, the profile of the sector is still silent. Whilst simultaneously the TAFE system continues to be publicly promoted and supported both financially and through marketing campaigns. With the ongoing decline in the number of LL providers across the state, the impact is felt most in the areas of greatest need.

Free TAFE has confused the market, as LLs are also not-for-profit, they need to be recognised as public providers alongside TAFE. For LLs to survive, the Free TAFE initiative,

they have had to offer \$0 tuition fees. This has exacerbated their challenge to manage financial sustainability.

Free TAFE has also seen Skills and Job Centres deliver career planning, resume' writing and interview techniques in competition with LLs. Funding to build relationships with TAFE needs to be a visible part of the post-secondary system reform. The Community Engagement grants provided to TAFE have been swallowed up and not used for the purpose of engaging with the community. Nor have Jobs and Skills Centres been a notable referral source for LLs.

LLs regularly pathway learners into TAFE – referrals from TAFE back to LLs rarely happen. In fact, we understand that learners are languishing on Free TAFE waiting lists rather than being referred to LLs to engage in pathway programs. LLs are well placed to deliver skill-based qualifications, many of which TAFE are no longer delivering. With the Government building more resources within TAFE, the opportunity is ripe for LLs and TAFE to work together to maximise the use of these facilities seven days a week, both day and night.

Post-secondary success rates for completion and further study have strong links to those who have engaged with LLs and have completed pre accredited and lower level qualifications, both prior and during participation in accredited training.

If we are committed to equal opportunity, we need to ensure that the most vulnerable of our community are supported to gain literacy and numeracy and skills for work, and these are the areas in which LL providers excel, through programs that are appropriately funded to provide the more intensive support required. Community-based education and training has a long and demonstrated history of supporting vulnerable learners effectively and efficiently. They are key in helping to build confidence and self-esteem, and increasing social interactions, along with the essential literacy, numeracy, employability and digital skills training required for success in further training and employment.

What is your experience of current regulatory processes?

The annual planning cycle for LL providers is incongruent with the short or no-notice periods provided when significant changes occur in the funding contracts. Planning cycles are complex and time consuming due to the democratic, board of management-based decision making that occurs within the LL sector. The process of applying for qualifications to be added to the RTO's scope varies greatly between regulators, with ASQA processing often within the month, while the VRQA can take up to six months.

The current Skills First Contract only allows additions to the funded scope at limited times throughout the contract, which is detrimental to the sector's ability to be agile and responsive. Program Delivery Plans (PDP) are prepared in September for the following year, which does not allow for flexibility throughout the following year.

How could regulatory arrangements reduce red tape and promote excellence?

Compliance requirements are complex, time consuming and inconsistent across the sector. Quality Reviews conducted by HESG vary from reviews by ASQA. The current auditors for the Skills First Contract use a cookie cutter approach that can be inconsistent and not tailored to individual needs. The sector considers the current regulatory and auditing approach is punitive and this creates unnecessary fear and anxiety. This approach is not conducive to collaboration and it hinders rather than supports continuous improvement.

The quality of individual auditors who do not hold current VET skills and knowledge is an ongoing concern in the sector. This lack of currency of knowledge results in confusion and miscommunication during LL audits. Audits are time consuming and stressful. A collaborative and helpful approach would reduce fear and enhance compliance and excellence. The disruption to business created by audits, reduces critical time to focus on learners and delivery. Funding to support LLs with compliance would reduce stress, help maintain consistency in contract accordance, enhance quality delivery and promote excellence.

How could governance arrangements for public education and training providers change, to reduce waste and foster greater collaboration?

There are many opportunities for TAFE and LLs to work together as publicly funded providers. Publicly owned facilities within TAFE should be available to LL providers. There is also the possibility of joint approaches to governance. Forty percent TAFE funding is consumed by overheads, sharing resources is an effective way to reduce overheads for both TAFEs and LLs.

A great deal of work needs to be done to inform TAFE of the role of adult community education and LL organisations. There is enormous potential for collaboration. To support vulnerable learners to transition into TAFE and to help learners struggling with the TAFE environment to transition into community-based training, LLs are perfectly positioned to provide additional literacy, numeracy, employability, and digital skills training to learners undertaking TAFE programs. This will assist with students' completions and transitions into employment. Ideally, LL experts could be deployed and embedded within TAFEs to broker the relationships between LLs and TAFE.

How would a simpler and more streamlined funding environment improve your ability to sustainably deliver quality learning?

ACEVic strongly supports quality and accessible public education for all Victorians. To ensure the equitable provision of VET, funding rates should be indexed at least against CPI. The true cost of delivery is not reflected in the funding rates. While funding rates remain static, costs including payroll expenses are rising at between 2.5-5% per annum.

LL RTOs need support in quality delivery and in the auditing process. LL providers require supported guidance to ensure compliance to the funding contract, and an auditing process

or regime that measures the quality and positive impact that our programs achieve. LLs are committed to providing quality low cost, accessible education, and training opportunities.

Streamlined funding would provide a sense of stability and allow LLs to get on with the work of delivering quality education. Quality training should not be driven by fear of audits – we agree with the notion of developing a culture of quality. Through the nature of the current auditing regime, LLs are often left with the feeling of having to constantly prove their worth and justify their existence, in contrast to TAFE who continue to receive additional funding such as the Free TAFE initiative.

LLs require additional funding, not just for program delivery but also to support the small class sizes and one-on-one support required by vulnerable learners, who frequently have multiple barriers to successfully engaging in training and education.

Students

How do you monitor and support your students' transition to relevant employment?

Many ACFE programs are designed to specifically assist learners to transition into employment, either directly, or post accredited training. Employability skills training is integral to all ACFE programs and many courses contextualise the employability skill development to specific vocations. LLs provide career planning advice and are linked to Job Active providers who also assist learners to gain employment.

LL RTOs develop and maintain strong links with industry and support learners to gain employment in industry after course completion. Collaborative relationships with industry frequently result in employment opportunities for learners after they have completed their practical work placement. This process helps learners enter the workforce, whilst also giving workplaces the opportunity to select prospective employees.

The very nature of community-based education is that learners develop robust and sustainable relationships with LLs and their local community. Due to the safe, welcoming, and inclusive environments, many learners maintain regular contact with their LLs, providing opportunities to monitor and support them to transition into employment. A key feature of the ongoing welfare and psychosocial support offered by LLs is the underpinning ethos and philosophical commitment of LLs to unreservedly support their learners and communities.

What works, and what is needed?

The Skills First Reconnect program enables LLs to assist eligible participants to transition into accredited training using case management, mentoring and career planning strategies. Many LLs who deliver the Reconnect program also assist participants into employment post accredited training. This individualised mentoring and wrap around support has proved highly effective in aiding vulnerable learners to transition into employment. Including pre-accredited training as an outcome for the Skills First Reconnect program would further enhance support for learners and increase the likelihood of transitions into accredited training and employment.

However, it should be noted that LLs assist many other learners who are not eligible for Reconnect, to remain engaged and work through challenges that may arise during training. Additional funding, such as a community service obligation funding, for LLs or an extension of the Reconnect program would help all vulnerable learners to successfully complete their course and pathway into employment. At present, LLs fund this additional support out of existing SCH funding, which as previously mentioned is becoming tighter and tighter due to not rising with CPI.

Relationships between LLs and Skills and Jobs centres could be developed to increase support for learners to gain employment. Job Active agencies (JAs) require further training and understanding of the purpose and position adult and community education plays in the post-secondary system. Some JAs are unaware of pre-accredited training. This information sharing needs to occur at a broad cross-departmental level, to support and complement the work that LLs undertake to educate JA staff on adult and community education.

Why do students leave courses before completing?

Many learners who access adult and community education have extraordinarily complex lives, which can prevent course completion. This can include, but is not limited to, alcohol and drug addiction, poverty, mental health issues, anxiety, depression, low socio-economic status, homelessness, trauma, domestic violence, interaction with the justice system. These are some of the reasons why adult and community education plays such a critical role in supporting Victoria's most vulnerable learners and demonstrates why the sector needs to be sufficiently recognised, acknowledged and resourced to ensure sustainable provision of adult and community education and support for the most vulnerable learners.

Some learners do not complete their course due to the quality of training. It has been pleasing to see many 'dodgy' providers lose their registration over the past 5 years.

Some learners leave training because they have successfully gained employment.

How do you support students to maximise their chances of completing?

ACFE pre-accredited training is embedded in the principle of student-centred learning. Providing individualised support in classes with small sizes with a focus on participation and learning rather than assessment often results in increased learner engagement and completion. The cost of pre-accredited training is kept to a minimum to enhance accessibility and equitable access to participation in education, training, and employment.

Offering pre-accredited training in literacy, numeracy, digital and study support both prior to and while undertaking accredited training aids successful completion.

LL RTOs are not specifically funded to provide student and wellbeing support, aside from the Skills First Reconnect program. However, adult education providers are dedicated to supporting their learners to achieve their goals, and aspirations. Some LLs find creative solutions such as additional support being provided by volunteers and/or university or VET students completing placement hours in education, social-work, and psychology. Larger LL

RTOs have been able to support a team of mentors through the Reconnect program and other funding opportunities to provide this additional support – but this very much depends on Reconnect being an ongoing commitment.

LL RTOs apply reasonable adjustment to delivery and assessment of accredited programs, often including literacy and numeracy support without taking advantage of the literacy and numeracy support funding through the Skills First Contract. Although LL RTOs are excellent at providing additional and targeted support, they sometimes do not record the additional learner support they provide, which is detrimental during audits. This is a capability and capacity issue.

LLs provide support for learners through information and advocacy for food, accommodation, and other basic needs. These services are provided free of charge or at low cost and without additional funding. There are many examples of trainers cooking food for isolated and vulnerable clients. For example, the Reconnect Program at The Centre (Hume region) and Cire Services LLs have seen support officers transporting clients to meetings with Centrelink and crisis centres to gain housing and benefits for the clients. These services are inherent to the ethos of community-based provision and are not offered by TAFE and larger providers.

Extensive one on one support is provided to clients at LLs. Pre-accredited and accredited clients rely heavily on trainers, the student administration and reception staff of the LL for support and assistance with a wide range of services.

How do you set course fees and communicate them to students?

Pre-accredited and accredited course fees are kept low to ensure equitable access to courses for vulnerable learners. Often the cost of chasing unpaid fees and bad debts is higher than the value of the debt. The Free TAFE program has driven the cost of training to the learner down, while challenging the financial viability for many LLs.

How are course fees affected by changing government subsidy levels?

Although Foundation program rates have remained the same for a long time, learners invariably require additional support. Government receives great value for money from LLs as they have much lower overheads and salaries.

There is a misconception that LLs employ unqualified or staff with limited qualifications. This is incorrect, as for example many language specialists hold post graduate qualifications and many qualified teachers choose to work in community providers because they align with their values system. However, highly trained personnel need to be adequately remunerated. LLs often find it difficult to compete with TAFEs who remunerate on a higher award.

Most LL RTOs deliver lower level qualifications (AQF 1-2) which are not delivered by TAFE or other RTOs. These qualifications are Foundation or entry level industry qualifications and provide vulnerable learners with a second or third opportunity to engage in learning. LLs may deliver Certificate II industry qualifications, which provide ideal pathways for our

learner cohort, particularly those with low education attainment and learning difficulties who require a longer learning journey and individualised support. The funding subsidy levels for these courses are low which makes them more challenging to deliver while staying viable.

VET should be not-for-profit education and should be accessible to all learners. No matter where one sits in the social hierarchy many will likely experience some form of crisis at some point in their lives and it is during these times that LLs support those in need to re-engage and get back into work and learning.

ACEVic would like to see funding rates indexed against CPI. The true cost of delivery is not reflected in the funding rates. The race to the bottom has not helped anyone and reduces the capacity of community providers to serve the most vulnerable members of our community. Class sizes need to be smaller for vulnerable learners; however, income needs to cover wages.

LLs have been affected by the Free TAFE initiative forcing LLs to reduce fees to maintain student numbers. LLs cannot afford to put their fees up because vulnerable learners cannot afford to pay higher fees. We are still living with the bad behaviour and outcomes from the previous VET Fee Help scheme. LLs regularly help vulnerable learners who have Diplomas, a debt, and no skills to search for work. LLs use exemptions to support these students to re-engage. Unfortunately, the 10% limit is impacting on LLs as many have used their allocations of up-skilling exemptions within the first semester, leaving few options for second semester.

How do you develop curriculum and assessment within your institution?

All RTOs require support in quality delivery and the auditing process. Quality delivery is impacted by the poor standards of commercial teaching and learning resources. Standardised assessments would support improvements across the whole sector.

There is a huge amount of work performed by individual LLs in the development of resources and assessment tools. The quality of assessment across the VET sector remains problematic, due to lack of funding, resources, and specialised curriculum/instructional designers

The Government should look to support collaboration between LLs and TAFE to develop teaching and learning resources and engage in joint validation and moderation. Since 2009 and the introduction of the VTG, there has been reduced collaboration and an influx of poor non-compliant commercial resources.

What could be done to improve curriculum and assessment?

The development of centralised, quality-controlled resources made available to all LLs would prevent the significant cost and time taken by individual LLs to develop their own teaching and learning resources. It is exceedingly difficult to find competent curriculum designers and LLs struggle fund instructional designer positions.

We recommend investment in a Victorian instructional designer workforce for use across the sector to develop quality resources and assessments.

What information do you provide to prospective students about your courses?

Information is provided as per the contractual requirement, including qualification name, code, duration, hours of engagement, cost, and support. This can include but is not limited to: websites, brochures, course guides, social media, information sessions, careers, expos, referral from agencies such as Skills and Jobs Centres, Job Active Agencies, Disability Employment Services, Transition to Work and Skills First Reconnect

What makes students choose you?

Many learners chose adult and community education providers because of their reputation of being community owned and run. LL organisations are accessible, low cost, friendly, inclusive, supportive, welcoming, non-judgemental and they serve the most vulnerable learners. LLs can provide a range of other services such as community development, childcare, welfare support and social interaction activities.

Students often select LLs because of their reputation for serving their communities. The LL location, the friendly environment, which may include a community kitchen, food bank and community gardens, provides an attractive inclusive community space.

The small class sizes and individualised attention is attractive for many learners. In particular, for learners with low confidence due to complex and traumatic lives and low language, literacy and numeracy skills.

How have you responded to 'thin markets' in regional and rural areas?

LLs are ideally placed to support thin markets. Training costs are kept to a minimum and the training offered is flexible and meets the needs of individuals, industry, and the community. To attract learner cohorts, LLs are skilled at developing partnerships with a range of community welfare agencies, other RTOs, sometimes including TAFE, and Government Departments such as Department of Justice and Community Safety (DJCS) and the Department of Health and Human Services. For example, in rural areas where student numbers may be low, LLs often partner with DJCS and provide pre-accredited pathway programs for learners exiting the criminal justice system or completing community corrections hours.

LLs leverage off partnerships with neighbourhood houses in smaller centres to deliver place-based programs. This is particularly vital in rural and regional contexts where public transport is extremely limited.

What has worked and what has not?

LLs are accomplished at meeting the needs of learners, industry, and the community. They are agile and responsive and will adapt to the local training demands and plan courses accordingly. The flexibility of the adult and community further education funding contract

promotes flexibility and innovation. LLs are well placed to work collaboratively with community welfare agencies, local councils, and libraries.

Further work is required to build trusting and robust working relationships with TAFEs, enabling the sharing of resources and smooth transitions for learners between LLs and TAFE and vice versa. The responsibility to develop these relationships cannot be placed with the under-resourced LLs who already work in fiscally constrained environments. TAFEs need to move towards LLs with informed and collaborative attitudes.

What support do you offer students struggling with literacy and numeracy?

The adult and community education sectors are leaders in the provision of literacy and numeracy (LN) for vulnerable adult learners. There are currently several large professional development projects supporting LL practitioners in the provision of adult literacy and numeracy training. The ACE sector is skilled at assessing learners' core skill levels and designing appropriate LN development pre-accredited programs, including courses that have been contextualised to specific industries. The ACE sector embeds literacy, numeracy, employability and digital skills training within vocational pathway programs, preparing learners to pathway into further study and employment

Learners benefit from individualised attention in small classes and extra tutorial support. Increasingly, learners can access blended, flexible online learning options. Pre-accredited training is ideally positioned to provide literacy and numeracy training whilst learners undertake accredited training. There is enormous potential for LLs to partner with TAFE institutes to provide literacy and numeracy support to TAFE students.

Many LL RTOs deliver Foundation programs, such as English as an Additional Language and the Federally funded Skills for Education and Employment (SEE) program, which provides specialised literacy and numeracy training. Some LLs are now part of the federally funded Foundation Skills for Your Future panel.

Are pre-enrolment assessments effective?

This is dependent on several variables -who conducts the assessment; the quality of the assessment tool; and how the test is conducted. Online assessments pose a risk in terms of ensuring the assessment has been completed by the learners.

How do you support apprentices and trainees complete their course?

There has been a marked decline in the traineeship market during the VTG – Skills First period. Whilst some LL RTOs have trainees, school-based apprenticeships can be challenging to negotiate with employers. Trainees and apprentices are often vulnerable members of the community who need wrap around support offered by LL organisations.

What other support could be offered?

LL RTOs need additional funding to include the provision of welfare and student support. A similar model to the TAFE system would help all learners. Apprentices often need more

support, as they are frequently young people who have left school early, have complex lives and are vulnerable. The Skills First Reconnect program offers ongoing support and mentoring for apprentices and trainees if they are eligible for the program. It should be recognised that many LL learners are not eligible for Reconnect, and Reconnect numbers are limited.

How do the learning needs of your students differ at different stages of life?

LL organisations play a key role in supporting a broad range of vulnerable learners. ACE providers are well connected to community welfare and support agencies. Learners bring a range of lived experiences to their learning, including different traumas, skills, fears, and apprehensions. This can vary between disengaged youth who may need additional wrap around and psychological and welfare support, to adults wanting to develop their literacy and numeracy. Unskilled workers, workers at risk of unemployment and long-term unemployed may seek further skills, such as career planning, and support to build confidence and self-esteem. The adult and community education setting can provide women leaving domestic violence with the kind of support and the nurturing learning environment they need. Older learners may need skills updated, including in the use of technology and help in adapting to new ways of working. New arrivals from refugee and migrant backgrounds frequently seek training and assistance from LLs and require re-training to enable them to secure employment and to settle into their new lives in Australia. Many LLs provide training and support for learners exiting the criminal justice system and for those leaving drug and alcohol rehabilitation programs. To be able to participate in pre-accredited pathway programs at these critical times can have life changing and profound long-term benefits.

What could encourage lifelong learning

Learners feel supported by learning in their own communities and by being in environments that are supportive and non-judgmental. It is critical that vulnerable learners feel safe and comfortable and are supported to re-enter education.

Currently the Skills First up-skilling eligibility restrictions prevent many vulnerable learners from upskilling because they hold out-of-date or irrelevant qualifications, or due to a multitude of legitimate reasons, the learners want to access the same or higher-level qualifications. Similarly, the current limit of two commencements at the same qualification level across a lifetime, limits access to training for learners with complex lives. The eligibility rules continue to reduce the ability of adults to re-skill and progress through the 5-7 career changes we can experience throughout our lives. For some learners, it is impractical to keep upskilling, for example, it may not be appropriate to enrol in a diploma as the worker may be best suit to remain at a AQF 3 level.

Providers

Do you think we have the right mix of post-secondary education and training providers in Victoria? What do we need more or less of?

- There are currently 271 LLs
- 794 Private RTOs
- 12 TAFEs

Large numbers of private RTOs, often driven by profit, appear disproportionate to the number of LLs, which play a critical role within the post-secondary education system supporting vulnerable learners to transition into further education, training, and employment. LLs attract priority learners with 'high needs' who require specialised and individualised support. The funding arrangements, which focuses on delivery only, severely limits how much real progress is made towards developing literacy and numeracy.

The current mix of post-secondary education and training providers is confusing to students, businesses, and the community. Students looking to enrol in courses at 'reputable' and 'credible providers' struggle to identify good quality training institutions. Informed choice can be challenging due to marketing jargon and dubious student recruitment practices.

How do you keep your infrastructure and facilities up to date?

LLs that are not owned and maintained by Councils find it difficult to maintain and update their facilities and infrastructure. Thinly resourced LLs often submit grant applications to assist in maintaining their facilities and infrastructure – if they can find a suitable grant program. Time spent applying for additional grants can use up valuable resources in the process. Funding grants for capital works are erratic and upgrading facilities can take many years to achieve.

What would ensure that every Victorian student can access great facilities?

TAFEs can under utilise their buildings and resources. It is not uncommon to walk through any TAFE and find underutilised resources. Access to these resources would be beneficial for students, the LLs and the TAFE itself. Most students will move from LLs to TAFE, as they pursue their higher VET qualifications. Supporting LL learners into the TAFE learning environment improves their self-confidence and enhances pathway opportunities to further study and employment.

The development of collaborative partnerships between TAFEs and LLs based on mutual respect, not competition would benefit learners, LLs, TAFEs, the community, and the Victorian economy.

What are the strengths and development priorities of your teaching workforce?

The ACE sector has highly skilled educators who deliver tailored, student centred learning within supportive learning environments. ACE practitioners are adaptable and responsive and deliver training to meet the needs of their learners, communities, and industry.

Teachers in Foundation Skills programs are, highly professional and experienced teachers, often holding tertiary qualifications in Teaching English to Speakers of Other Languages (TESOL). It is this level of expertise that contributes to quality delivery of Foundation programs by the ACE sector.

Teachers are committed to their students and frequently provide support above and beyond the normal requirements of the job. LL classes are smaller comparable to TAFEs and large private RTOs, allowing teachers to work more closely and intensely with students, enhancing learner success and achievements.

The use of technology for blended and online course delivery is a development priority for the ACE sector. This has been of significant relevance during the COVID-19 pandemic as the sector has adapted to flexible program delivery.

What could be done to support their development?

The creation of a pre accredited teacher 'skill set' that is mandatory for teachers delivering ACFE programs (similar to mandatory qualification for trainers/assessors in accredited programs, but specific for pre-accredited training) would help establish a minimum skill level and standardise quality of program delivery.

Financial support is needed to ensure all LL trainers access the mandatory skill sets professional development training. LLs must factor professional development into their costs as trainers invariably need to be paid to attend training.

Maintaining and supporting professional development designed by sector experts in line with the ACFE board strategy will support capability development. Working alongside the ACFE Board and the Department of Education and Training, ACEVic, as the leading adult education peak body, is well positioned to continue to support the professional development of the sector.

What does excellence look like for you, in post-secondary education and training?

A strong vibrant, sustainable ACE sector that supports the most vulnerable learners to make informed education, employment, and career choices. Excellence represents an education sector that is equitable and supportive for all Victorians, where the most disadvantaged in our communities are supported to develop and reach their career and employment aspirations no matter where they live. A sector where the most disadvantaged receive appropriate and adequate funding which recognises the intense support they need – not low levels of funding currently available for programs such as CGEA.

The division of funding and resources needs to be equitable across the sector. The re-building of the Victorian TAFE system has been welcomed; however, investment and recognition is also needed for the adult and community education sector.

Currently, the post-secondary sector is not integrated. The ACE sector sits on the sidelines of the system, despite providing critical education for the state's most vulnerable. It is of concern that these disadvantaged and vulnerable cohorts are supported on a shoestring budget when they need the most resources to achieve transformational change and participate actively in our economy.

The ACE sector requires the support and recognition of Government and the wider community to sustain parity of status within the education system to provide appropriately funded and supported programs for those cohorts. The ACE sector is appreciative of the ongoing support by Victoria's Minister for Training and Skills and Higher Education. *The Ministerial Statement: The Future of Adult and Community Education in Victoria 2020-2025* provides direction and reform for the sector. However, the implementation of the statement requires funding, specifically for the LL providers. Funding not just for program delivery but also for resources, programs, and facilities to enhance the capability and capacity of the sector.

A robust and vibrant post-secondary education system is one in which all learners can engage in education and training at quality providers of their choice. The ACE sector cannot be left on the side-lines and continue to go unnoticed. Excellence represents well-resourced TAFEs **and** LLs. LLs have been recognised by Ministers over recent years as public providers – this recognition needs to become widespread.

Stakeholders in the post-secondary system includes learners, educators, industry, and the broader community. All stakeholders need to have confidence in the sector. Confidence in the provision of quality, student centred, relevant, industry endorsed training and education that leads to employment and enhances personal health and wellbeing, and community social and economic security.

What examples of excellence exist in Victoria?

The adult and community education sector is an agile, responsive and innovative participant within the Victorian post-secondary education system. This is reflected in the annual LL and Victorian Training Awards. Further details can be found on the Department of Education and Training Website indicating the board range of programs and categories demonstrating excellence and innovation within the adult and community education sector

<https://www.education.vic.gov.au/about/awards/pages/learnlocal.aspx>

With the support of the Adult and Community Further Education Board, every year LLs develop innovative programs, tools and resources under the Capability and Innovation Fund projects. Project outcomes and resources are shared across the sector and communities of practice support LLs and learners.

How do you support student pathways between VET, university, and adult community education? What would make pathways smoother?

Through pre-accredited pathway programs, learners are supported to transition into further education and training. Programs such as engagement courses, literacy, and numeracy; English language programs; employability skills training; preparation for study and employment, vocational pathway programs and career pathway planning.

There is a significant gap in understanding among various stakeholders of the role pre-accredited and community-based training plays within TAFE and Higher Education. This gap can be lessened by additional support and funding to increase the LL brand and develop awareness of the critical role adult and community education plays in supporting learners to pathway to further education and training.

The ACE sector needs a commitment from TAFE Victoria to work collaboratively and respectfully with LLs; to share facilities and resources; to assist learners to transition from LLs to TAFE and from TAFE to LLs; and to co-design pathway programs to meet learners and industry needs.

Industry and Unions

What does work readiness mean to you?

Work readiness means individuals have the core or transferrable work skills and confidence to commence work. To be work ready an employee must hold the required literacy and numeracy levels, employability skills, attitude and understanding of their obligations as an employee to enable them to gain and sustain meaningful employment.

How do you support-work readiness for your students, and what extra support would help?

Pre-accredited training plays a pivotal role in assisting learners to be work ready. ACFE funded preparation for employment programs are delivered at LLs to specifically help learners' transition to employment. Employability skills training is embedded in all ACFE programs.

How is industry involved in the delivery of education and training?

Some LL RTOs have strong collaborative relationships with industry. Pre-accredited training programs can be delivered in the workplace and are designed to meet both learner and industry needs. Accredited training can be delivered in partnership with industry specialists delivering qualifications. For example, Aged Care training can be delivered in industry with both accredited trainers from industry and the RTO working alongside each other. This provides essential industry currency and real workplace experiences for the learners, often leading to employment outcomes.

What is working and what is not?

Some industries work closely with the VET sector and are informed of current training packages and training needs. Other industries are not familiar with the standards and requirements of VET and this can be problematic when LL RTOs are seeking employers to engage in industry consultation to endorse and advise on training and assessment.

Many employers, especially in the Community Services sector, work collaboratively with LL RTOs and provide placement opportunities for learners. This mutually beneficial arrangement suits employers as they frequently select employees from student placements, and the learners gain work experience, and understanding of the workplace and complete their required placement hours. We recommend that more mandatory placement requirements be embedded in training packages. It is this work placement that supports learners to achieve a job related to their qualification. Without work placement, learners find it difficult to secure employment due to 'lack of experience'.

What is a fair investment from industry in the provision of education and training?

There are a multitude of ways industry can better support the provision of education and training for the ACE sector who are resource poor. Investing in the time to co-design pathway training programs with LLs will help vulnerable learners' transition into the workforce. Bringing learners into industry and providing training in the workplace assists learners to develop confidence, familiarity with the workplace and work-readiness.

Many LL organisations have limited training space, so sharing resources and industry expertise with the sector will support vulnerable learners.