

RESPONSE TO PROPOSAL FOR A PREFERRED PROVIDER SCHEME FOR REGISTERED TRAINING ORGANISATIONS IN THE EARLY CHILDHOOD EDUCATION AND CARE SECTOR

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To the Department of Education and Training
Email: vetquality@education.gov.au

Australian Community Children's Services (ACCS) is the national peak body for the community not-for-profit children's services sector. We believe that training of early childhood educators is central to the delivery of high quality children's services. We are pleased to offer our response to the questions regarding strategies to improve the quality of training in the early childhood education and care (ECEC) sector.

ACCS is strongly opposed to the establishment of a Preferred Provider Scheme for Registered Training Organisations (RTOs) as a strategy to improve the quality of training in the sector.

We believe that the quality of training will best be enhanced if the regulator, the Australian Skills Qualification Authority (ASQA) is strengthened in its capacity to monitor and act on poor quality RTOs.

A preferred provider scheme can only be effective if it is rigorous and well resourced. ACCS believes that resources must be directed towards strengthening ASQA's capacity to regulate.

There are risks in relying on a preferred provider scheme to control rogue operators. We believe that people will continue to enrol in poor quality RTOs to access perceived benefits such as low fees, short courses and online training. It is more effective to take direct action to put the poor quality RTOs out of operation.

Further we note that the low number of complaints received by ASQA is due to:

- Lack of clear communication about who to complain to
- The absence of clear action arising from past complaints

ACCS recommends:

- That an effective communication strategy is implemented to ensure the ECEC sector is aware of how to complain about poor quality RTOs and who to complain to
- That ASQA communicates regularly and comprehensively on the action it has taken on complaints received, and the impact of this action on poor quality RTOs
- That ASQA increase its random quality control audits
- That ASQA increase its audits targeting poorly performing RTOs
- That ASQA develop additional elements to trigger an audit, in addition to those already notified to them by the ECEC sector including:
 - Qualifications offered over very short time frames
 - Offers of enrolment incentives such as iPads
 - Non-compliance with requisite hours of practicum

- That ASQA increase the rigour of its quality control audits and ensure that the audits cover implementation of the qualifications as well as assessment
- That a national quality standard be established and enforced in regard to the delivery methods of RTOs, based on ECEC curriculum frameworks, national quality standards, laws and regulations
- That ASQA improve its processes for ECEC providers to raise concerns about the quality of training and assessment by RTOs
- That ASQA adopt the following methods to better collect and use information about training and assessment quality concerns:
 - Randomly scheduled surveys of students and staff currently in RTO settings
 - Randomly scheduled surveys of ECEC services who have hosted student placements in workplaces
 - Surveys or short interviews of students after graduation who are currently working in an ECEC service
 - ASQA evaluators to observe and assess teaching and learning practices of students while in ECEC services and assessment practices of RTO supervisors in the students' work placement
 - ASQA to review randomly selected pieces of assessment work of current students
- That ASQA use the information gained by the methods proposed above to inform the development of a national set of standards of assessment practices that support students' workplace readiness

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