

INPUT TO COMMONWEALTH DISCUSSION PAPER
Skills for Education and Employment (SEE) Program Redesign:
Stream 1 Market Preparation Paper
Submission from Community Colleges Australia
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1. Background

The Australian Government Department of Employment and Workplace Relations (DEWR) has released a discussion paper *The Skills for Education and Employment (SEE) program: Stream 1 Market Preparation Paper – Contract period commencing July 2024*.¹

The paper follows the Skills Minister's and Treasurer's Budget announcement that the Government will invest \$436.4 million over 4 years in a redesigned SEE program to improve access to foundation skills training.

Community Colleges Australia (CCA) has been very involved in advocacy for the Australian adult and community education (ACE) sector through the Commonwealth's Foundation Skills Advisory Group (FSAG), direct meetings with DEWR and liaison with other interested organisations such as the Reading Writing Hotline and Australian Council for Adult Literacy (ACAL).

Investigations by DEWR and Jobs and Skills Australia as well other research and reports from providers and industry point to an ever-higher need for literacy, numeracy and digital skills. There is a large unmet need for services. CCA is greatly concerned that large number of Australians are unable to participate effectively in Australian society. To meet this need it is crucial that capability within the education and VET sectors is supported and grown.

2. Australian Literacy Needs

CCA has noted the findings and recommendations of the recent report from the Reading Writing Hotline, prepared by Social Equity Works: *Insights from the classroom: A survey of adult literacy providers* (October 2022)²:

- Face to face individualised and learner centred delivery is what works best for literacy, numeracy and digital literacy (LND) learners.
- Online courses can provide access for some. However, the digital divide and low LND skills make it a less appropriate delivery mode for most LND learners.
- Face to face teaching and learning models have higher delivery costs than digital and online learning.
- The Foundation Skills Training package is not meeting the needs of many LND learners.
- High levels of disadvantage in the community, exacerbated by COVID-19, bushfires, floods and other natural disasters create significant barriers for these learners. This reinforces LND gaps where there is intergenerational poverty coupled with low levels of literacy.

¹ <https://tenders.employment.gov.au/tenders/841c5fda-140b-ee11-8f6d-6045bd3d31be/>

² See <https://www.readingwritinghotline.edu.au/wp-content/uploads/2022/10/RWH-Report-Insights-from-the-Classroom-Survey-of-Adult-Literacy-Providers.pdf>.

- Lack of qualified teachers and the level of qualifications required by teachers play a role in perpetuating poorer learner outcomes.
- Workplace delivery is low and many currently working are unable to access LND courses outside of work hours.

Recommendations include proposals to increase:

- community engagement programs to destigmatise literacy gaps experienced by adult learners;
- community outreach and partnerships to deliver programs and courses in local, safe environments that minimise shame and embarrassment and promote access;
- funding for First Nations English literacy, numeracy and digital literacy programs that are culturally appropriate & reflect diversity of models as identified by communities; and
- improved infrastructure and technology support for learners.

The report notes that one in five (20%) Australians (including two in five – 40% – of Indigenous adults) have low literacy and/or numeracy skills. The report also highlights:

Online learning: “Provision of LN programs is best done face to face rather than online. The move to digital delivery tended to disproportionately disadvantage LN learners due to:

- limited digital literacy skills;
- lack of access to secure internet access;
- print-based resources being preferable for adult LN learners;
- lack of access to home computers; and
- insufficient self-directed learning skills to manage online programs.”

“**The COVID-19 pandemic** and recent natural disasters have exposed the extent of the literacy gaps for those people who require access to recovery support and disaster relief. Access to such relief involved filling in of forms, often available only online, exacerbating their difficulty.”

Employment services: “The relationship between LN and DL provision and employment services was described by some respondents as being problematic. These respondents reported ‘lack of referrals’ from employment providers, little or no incentives for employment providers to make LND referrals, a focus on employment-only outcomes and/or inappropriate referrals to high level courses and programs delivered by the same employment provider.”

Regional, rural and remote areas “are often ‘thin markets’ for education provision, particularly in outer regional and remote areas, where a low population density can make it unsustainable for providers to operate or provide a large suite of academic programs.”

Unmet community needs: “Calls to the Reading Writing Hotline often indicate there are many needs in communities not being met by current LND classes and offerings.... The unmet need most cited by respondents to this survey was the need for ‘individual and tailored literacy assistance’ (64%). The second most cited unmet need was for ‘wrap around supports to address barriers and enable participation’ (52%). This was followed by ‘help with form filling’ (49%) ... ‘pathways into accredited courses’ (47%) and ‘lack of non-accredited courses delivered in community settings’ (43%).”

Workplace learning: “While a proportion of adults seeking LND learning are jobseekers, a significant proportion are also in the workforce but may be struggling to meet the LND requirements of their job. They may also be underemployed and seeking to increase their skills to increase their hours of employment or employment options.”

Promotion and advertising: “Respondents called for improved advertising and promotion that is targeted appropriately to adult learners in format and methods that would reach them including through community service providers and community forums,” libraries and social media.

3. CCA Recommendations to DEWR Stream 2 Program Planning

CCA’s key recommendations and responses to the discussion paper are for the SEE program and its tender process to respect and support both the diversity and the range of learner and provider characteristics and capabilities. This means:

- enabling provision to smaller, vulnerable cohorts by community education providers;
- building the capability and capacity of provider workforces to ensure SEE outcome are achievable; and
- delivering on clear outcomes/KPIs and do not tie the program up with red tape requirements.

3.1 Enable Provision

While community links are represented as important for tenderers, this neglects the role that smaller providers play in the delivery of foundational skills, in reaching “hidden cohorts” and the higher cost base inherent in reaching vulnerable learners with the most complex needs and with numerous barriers to learning. ACE providers have the capacity and the connections to deliver to many of the vulnerable cohorts relevant to the SEE Program however without due regard to their size and circumstances they will not be able to play the role required to achieve these aims.³ The current approach does not provide sufficient consideration of these factors.

CCA appreciates the constraints of a national program. However key to the success of a program designed to deliver assistance to vulnerable and disadvantage learners who have low level LND skills and are often hard to engage is (i) to focus on where people are; (ii) to provide flexibility, safe learning spaces; and to (iii) present customised and contextualised solutions. Community providers are mostly small to medium sized, and work across communities both large and small. It is very hard to position for a direct contract if a small, good metro provider, or perhaps a small regional provider, who may be better placed but will face delivery option constraints. Being small but high quality is a limitation to even attempting to tender alone. It requires a tender writing team working for months. It also hard to position with a very large lead organisation. It ignores the skills and the great local connections ACE providers have.

CCA requests consideration by DEWR to support the inclusion of smaller providers into the contract, by encouraging partnerships or collaborations, ensuring support for systems requirements and appropriate remuneration for their bespoke models of delivery. Not-for-profit community education providers are invested in their local communities. It may cost a few dollars extra per hour to deliver to smaller, high needs cohorts but this means learners embark on pathways into life and work – those who would otherwise remain outside employment and society. From a program perspective, they would represent a small portion of the total. Larger providers will still deliver in populous areas where larger class cohorts are possible and provide cost effective returns.

³ Read CCA’s analysis of how Australian ACE providers reach the most vulnerable and disadvantaged learners through these two recent reports, based on the latest (2021) NCVER data: <https://cca.edu.au/nsw-ace-providers-over-perform-in-reaching-vulnerable-and-disadvantaged-learners/> and <https://cca.edu.au/wp-content/uploads/2022/11/Victorian-Vulnerable-and-Disadvantaged-Students-by-Provider-Analysis-of-2021-Data.pdf>.

3.2 Provider Capability and Capacity

A major barrier to current delivery reported by all provider types is a lack of qualified teachers. The current teacher/trainer skill base is inadequate to meet the requirements and the aspirations of the SEE Program. Regional areas are particularly affected. This issue incorporates the need for SEE providers to have Australian Core Skills Framework (ACSF) specialists (highly skilled) inhouse to ensure assessments and outcomes can be appropriately measured and reported.

Serious and concerted measures are needed to build and lift the capability of the teacher/trainer workforce. **CCA seeks a national adult literacy and numeracy workforce strategy; this will be essential to make the revitalised SEE Program a success.**

Teacher shortages are widespread. This is most pronounced in literacy and numeracy. A high level of expertise is required to teach literacy and numeracy to the most vulnerable learners, and the pedagogy and skills are different from the English as a second language (ESL)/English as an additional Language Dialect (EALD) field. These professionals are not equipped, nor are they trained to meet the needs of literacy and numeracy development. There has been a dramatic decline in the number of specialist LND teachers, and a de-professionalisation of the sector. This is not 'news' yet nothing is in train at the policy level to address these shortfalls.

CCA recommends as a matter of urgency that a suite of professional development options for teacher/trainer professional development is implemented and made mandatory across all SEE providers as a part of the new contract to build capability and capacity. This may be staged and pitched at varying levels depending on the programs taught and may involve mentoring and project learning. Relevant professional entities, such as the Australian Council for Adult Literacy (ACAL) and the Reading Writing Hotline have considered this need at length and have more detailed information as to the makeup of such initiatives.

This initiative needs to be coupled with significant policy measures to beef up tertiary level skilling opportunities for specialist adult LND teacher training and support for workforce professionalisation.

CCA also recommends a focus on broadening and promoting the value and availability of the program widely to assist with *de*-shaming literacy and numeracy gaps, so as to encourage engagement with the program.

4. Specific Questions Input Request

Following are responses, comments and reflections to and on the specific questions asked in *The Skills for Education and Employment (SEE) program: Stream 1 Market Preparation Paper*:

4.1 Contract Regions

What changes could the department make to Contract Region boundaries or contracting within Contract Regions to better support learner access, particularly, in regional and remote Australia?

The distribution used for the current SEE contract mirrors 58 employment regions across Australia. For Sydney, for example, the current division means there are only four regions, and in Melbourne five. CCA presumes that these will go to larger organisations that either have a contract now or have the coverage (or apparent coverage). In regional areas, the divisions are very large and given the 'thin markets' or

areas where there aren't sufficient services to meet prevalent needs across many regional areas, individuals and small clusters of people in harder to reach areas miss out.

While fewer regions would make it simpler to administer from a central governance perspective, having large regions and requiring providers to cover each fully limits the opportunity to engage good providers with high capability but only partial coverage of a region.

CCA does NOT want to see a revitalised and upgraded SEE Program contract with providers which only take the "easy" students in the most convenient locations, with the least disadvantage, leaving the hardest to reach and teach to the small/medium not-for-profit ACE providers and TAFEs.

In previous iterations of the SEE contracts, there were more than 100 smaller "employment service areas" which allowed smaller providers to effectively work within specific areas. CCA favours a similar division, allowing more discrete groupings to be identified, and hopefully better served sub-populations of learners. More specifically, regardless of the broader 'regions' identified, if the program is to reach the most disadvantaged it is crucial there are mechanisms and funding available to provide appropriate delivery of services to learner wherever they live.

The current arrangements and cost structures for the program (the funding envelope has not changed, while program aims have increased) lend themselves to provision in areas where larger class sizes are easier to muster, while areas with smaller numbers of students may miss out. The larger providers in a multi-provider model, in what is a hard program to run, will want to opt for the large volume sites and leave the less viable small volume sites to smaller players. This is a common, not unreasonable strategy used by larger providers to run the program profitably.

It is very hard to position for a direct contract if a small, good metro provider, or even for small regional providers. It ignores the great local connections and engagement community education providers have.

Being small but high quality is a limitation to attempt to tender alone, as it requires a tender writing team working for months. It is also hard to position with a very large lead organisation. There may be more chance if an organisation is in a regional area, but also less chance of having viable delivery options.

4.2 Assessment and Enrolment of Learners in the SEE Program

Are the proposed caps for the remote component of Blended Learning (Initial 10%, Basic 30%, Advanced 50%), proposed in the Training Streams above, appropriate for the needs of learners?

If you do not support different caps for each training stream based on learner LLND levels, what do you recommend in order to best support learners undertake remote learning?

CCA members unanimously support the finding that face-to-face (place-based) training is preferable to all other forms of delivery. They were also unanimous in their views that it is not always possible and learner circumstances must always be considered when determining limits. Vulnerable learners are highly likely to have complex issues surrounding their engagement.

The caps suggested are convenient. If limiting remote means that students attend in-person, it is probably advantageous however if it means they just don't attend it is a bad outcome. For example, such caps may limit students at the lower levels that have transport issues or caring responsibilities.

A far greater concern re the delivery mode that cuts across questions posed is learner ability and access: the ability to utilise effectively the technology fundamental to online forms of delivery, and to be able to access the relevant technology. E.g. computers, phones, space *and* the relevant bandwidth. This is key to effective outcomes, and not considering these factors at commencement and during program delivery will have an equal or greater impact on learner success than other factors.

The variable caps are OK but 10% is very low – and across the board there does need to be an element of flexibility to ensure learner not contract requirements are met.

4.3 Support for Learners

How could the department ensure Case Managers are evenly distributed across Contract Regions to ensure all learners have access to support even in sites with lower enrolment numbers?

A key factor for effective Case Manager roles is having enough funding so that providers can afford to engage Case Managers at an appropriate skill and experience level. Once the case managers are in place it is likely that they will prioritise the people that need the most support. Distance or size of region could be weighted at a similar level to numbers of students, as a base measure.

The discussion paper talks about 3 hours *annually* per participant – if for example you have 100 clients then that is 300 hours of support. It does appear that given the aims of the program, and the limited funds for case officers, there will need to be many learners who require very little or no support or the process becomes unviable.

4.4 Training Delivery Modes

Do you think Distance Learning is better serviced through a different model? If so, which alternative model do you consider to be more appropriate?

Distance learning should be a last resort as it is likely to be an inferior model to either face to face or blended delivery; see the notes above from the findings of the Reading Writing Hotline survey. CCA acknowledges that there are many locations where distance learning is the only viable option, but it must be supported or facilitated.

In CCA's consultation process, questions were asked by community providers as to whether this is facilitated or mostly self-paced? Providers were critical of current practice. To that end, ensuring *all* providers have the capacity to deliver distance/remote learning in their regions gives the best chance of moving students into a face to face or blended model in the future. CCA recommends this option with the proviso that *all* providers have access to a quality platform to do it well.

Sharing of good, relevant resources would also be beneficial. Currently for example, within the program distance learners are often provided with resources valid in face to face, not distance learning contexts and come without additional support, which defeat and demoralise learning progress.

This again brings up capacity within the service for the customisation needed to ensure learner needs are both identified and met.

4.5 Course Delivery

Should there be a limit on the amount of non-accredited training? If yes, what do you consider to be a preferable alternative?

Feedback from ACE providers on the levels and amounts of non-accredited training in the program was mixed. There was a strong feeling from those who had previously delivered the SEE Program that non-accredited training was important and needed to be a part of offerings to learners, but must be combined or lead into accredited training beyond the basics of foundational skills as they move toward employment – and completion of accredited units would potentially be credited to pathway studies.

Others focussing on with engagement with low literacy and very vulnerable learners, and embracing the opportunity to assist the expanded cohorts, wanted to focus on the agency provided by engagement with suitable training, and with the impact and direct outcomes of the learning. They stress the importance of non-accredited training to be used as needed, to allow for customised programs to suit learner needs.

All providers believed the student pathways should be prioritised over training package pathways.

4.6 Performance Management Framework

Are these KPIs better aligned to SEE program training and the needs of the learners?

CCA believes that the measures outlined in the Discussion Paper are reasonable. We do need to have robust measurement to ensure that students' skills are increasing but we need to be careful that ACSF verifications are not so complex that we focus on this rather than student progression.

Implementing and teaching to the ACSF is a skilled task: it limits the capacity of providers in a time of severe skills shortages. Reinforcing the requirement and funding for professional development measures in the SEE contract.

5. Use of the Term “Market” for the SEE Program

Words matter, and the choice of the term “market” when referring to Australian vocational education and training (VET) is more than symbolic; it shows a preference to continue Australia’s deeply problematic policy of *marketising* the VET system. The term underlies and reinforces a philosophy that endorses the view that private, competitive provision of VET services, including to disadvantaged learners, is the best means to skill Australia. CCA strongly encourages DEWR to adjust its terminology to reflect a system that emphasises quality of provision and ethical behaviour by training providers, rather than a “competition” that seems like it will include “cost efficiency” as a major criterion. Lower costs will not equate with quality provision.

Both the title of the SEE Program “Market” discussion paper and a number of phrases in it should be changed. The paper includes the following phrases:

- “Introduction of longer-term contract arrangements of up to 10 years to provide greater stability **in the market.**” (page 7)
- “These will be detailed in the RFT when released **to the market.**” (page 8)
- “This document, being **the formal approach to market process** for the SEE program.” (page 28)

Why not re-word those phrases:

- “Introduction of longer-term contract arrangements of up to 10 years to provide greater stability **in the VET system.**”
- “These will be detailed in the RFT when released **to VET providers.**”
- “This document, being **the formal approach to possible providers** for the SEE program.”

CCA requests that every time DEWR considers using the phrase “VET market”, the word “market” be removed and replaced with the word “system”, so it reads “VET system”. Does it still make sense? We believe that it will and will lead the reader to a better understanding of Australian skills and training, one which is based *on how the system operates*, not that it is somehow a “buy and sell” market.

CCA has published a separate paper about the use of the term “VET Market”, and we encourage you to access it.⁴

⁴ Go to the paper, *Why Australia Needs to Stop Using the Term “VET Market”*, by Dr Don Perlgut, 3 July 2023; available at <https://cca.edu.au/wp-content/uploads/2023/07/Why-Australia-Needs-to-Stop-Using-the-Term-VET-Market-Don-Perlgut-3July2023.pdf>. Read an html summary at <https://cca.edu.au/australia-needs-to-stop-using-the-term-vet-market/>.