Review of C and E Course Classifications

Public Consultation Report

2021

Front Cover Art provided by Canberra College student Aidan Giddings

Contents

Introduction

This paper should be read in conjunction with *The Review of C and E Course Classifications: Report* and *The Review of C and E Course Classifications: Regulation Impact Statement.*

Executive Summary

Background to the engagement

The ACT Board of Senior Secondary Studies (BSSS) recognises the value of vocational educational training (VET) courses and their contribution to quality education and enhanced transitions to work and further education.

Students can undertake Vocational Education and Training (VET) as part of a senior secondary certificate and completion by a student can provide credit towards both a recognised VET qualification and a Senior Secondary School Certificate.

System developed BSSS Courses integrating VET were introduced in 1998. This remains the primary approach for delivering VET qualifications to senior secondary students in the ACT.

C and E Course classifications were Board endorsed in December 2008. This followed discussions about the contribution of VET towards the ACT Senior Secondary Certificate (known then as the Year 12 Certificate). Prior to the introduction of C Courses, VET was recognised in the form of registered (R) units. The decision to create a new classification was designed to increase the status and contribution of VET courses in the certification of students.

The E Course classification was Board endorsed to include all externally delivered VET. This included Australian School Based Apprentices (ASBAs), which were previously credited as R units on the ACT Year 12 Certificate.

The purpose of this Review is to examine existing Board of Senior Secondary Studies (BSSS) curriculum, assessment and moderation policies and procedures for C and E Courses, to determine if changes are required to meet the future needs of students pursuing a VET pathway, whilst at the same time meeting BSSS legislative requirements.

The draft recommendations published for public consultation are as follows:

> **Draft Recommendations**
>
> 1. That C Courses be redeveloped as A/T/M/V or A/M/V courses.
>
> 2. That the level of contribution, achievement and quality assurance requirements of VET qualifications intended for consideration as E Courses on the ACT Senior Secondary Certificate are consistent with high expectations for students and support the integrity and quality of the certificate.
>
> 3. That E Courses continue to be delivered by external providers only.
>
> 4. That the BSSS establish an approved list of external non-school based RTOs, providers, and qualifications.

Asking people for their feedback

The BSSS Secretariat, on behalf of the Review Committee, conducted public consultation on the *Review of C and E Course Classification: Report (Report)* between the period 17 August and 17 September 2021.

The Review Committee were interested in hearing the perspectives and views from a range of stakeholders including:

- teachers of VET
- Curriculum Coordinators and VET Coordinators
- VET students
- principals
- parents
- industry
- tertiary sector, including CIT and universities

Stakeholders were invited to provide feedback on the draft recommendations, either by

- using the Survey Monkey Platform available on the BSSS Website
- written submission
- attending an online focus group event.

Notification of public consultation was published on the ACT Board of Senior Secondary Studies website at www.bsss.act.gov.au.

Summary of Responses

Online forums:

There were 86 participants in the 10 online public forums including, principals, VET and Curriculum Coordinators, VET teachers, parents, VET students, industry, and the tertiary sector including CIT and universities.

Written Submissions

There were 21 written submissions received through the BSSS Enquiries email address, from a range of stakeholders including teachers, students, parents, and school executives.

Survey Responses

A total of 15 responses were received via the online survey including principals, teachers, VET and Curriculum Coordinators, business, and industry bodies.

Further analysis and methodology of the responses are provided in subsequent sections.

How people responded

Of the responses, greater feedback was provided concerning Draft Recommendation 1 when compared with all other recommendations.

Many respondents identified issues with Draft Recommendation 1, but few provided suggestions as to how problems could be addressed.

A large proportion of responses and participants were from one ACT College and course. A large proportion of participants in the online forums also submitted written submissions and survey responses.

Confusion between VET in general and C Courses became evident throughout the consultation period with many respondents advocating for VET more generally rather than specifically addressing the Draft Recommendations.

Structure of the report

This report does not summarise each individual respondents' contribution, rather key themes raised during public consultation, including those in opposition. It also contains the methodology, nature and participant engagement of each public consultation mechanisms utilised.

Methodology

A range of methods were used to promote engagement and encourage participation in response. The public consultation process was detailed in *The Review of C and E Course Classifications: Report*.

The public consultation process included:

- Letters of invitation

  Letters inviting key sectors and stakeholders to participate in the public consultation process were distributed via email.

- Online Surveys

  A link was provided to the survey on the BSSS website.

- Written submissions

  Criteria and the process for written submissions was published on the BSSS website.

- Online public forums.

Survey

The online survey provided an introductory context and background information about the *Review of C and E Course Classification: Report*.

Four questions were devised to gather information about the respondents' experience and engagement with VET in senior secondary schools.

Questions 5 through 8 sought responses to each of the Draft Recommendations, with a provision for a written comment.

Respondents were offered the opportunity for further comment at the end of the survey questions.

The survey was available between the period 17 August to close of business Friday 17 September 2021.

Written Submissions

The opportunity to provide written submission was published with the *Review of C and E Course Classification: Report* on the BSSS website. Guidelines and suggestion to writing a submission were detailed in the report, including:

- Have you commented on some or all the terms of reference and draft recommendations?

- Is your submission no more than 4-5 pages?

- Have you provided a summary of your submission at the front?

- Have you provided your return address and contact details with the submission?

- Have you made sure that your personal contact details are not in the main part of the submission?

- If you do not want your submission published on the internet, have you made this clear on the front of your submission and told us why.

Online public forums

Invitations to participate in online public consultation events were distributed to the representative groups via email.

Forums were established for the following groups. The dates of the forums are indicated:

Stakeholder	Dates
Principals	2 and 4 September 2021
Curriculum and VET Coordinators	3 and 6 September 2021
VET Teachers	7 and 9 September 2021
VET Students	9 and 10 September 2021
Parents	9 September 2021
Industry and Higher Education	13 September 2021

See Appendix 3 for a copy of the Online forum presentation.

Presentation 1 – Principals, Curriculum and VET Coordinators, and VET teachers.

Presentation 2 – Students, parents, industry, and higher education.

Note: Following the first Principals forum on 2 September, the presentation was adjusted to include two further questions, to gather more specific feedback about the knowledge, skills and values students should have gained at the completion of their senior secondary education, and about the skills, knowledge, behaviours, and values students should gain from the study of a VET course.

Analysis of the responses

Public consultation is an important and valued process undertaken to gather perspectives and opinions. Whilst this process is available to everyone to participate, it is important to note that:

- certain stakeholders may have been more likely to contribute than others
- the responses cannot be assumed to be representative of all stakeholders.

Key Themes

- Integration of VET in A/T/M/V or A/M/V courses is problematic and increases workload for teachers.
- Competency-only courses provide a clear pathway to industry and industry richness.
- Teachers at school-based RTOs value ASQA regulatory standards and deemed quality assurance measures they enforce as sufficient.
- Competency-only courses offer flexibility in assessment and learning to cater for the needs of diverse learners.
- Risk associated with qualified trainers was acknowledged. Competency-only courses reduce a barrier for industry professionals to deliver training in schools, and to increase access to expertise and networks beyond the school.
- There may be value in investigating alternative approaches for the continuation of C Courses.
- Exploring the contribution of E Courses to the ACT Senior Secondary Certificate was supported.
- Exploring the development of approved external providers was supported, with caveats around process, criteria, restricting student choice and consumer competition.

Who responded during the engagement?

The following analysis is provided to show the total engagement in each feedback mechanism, a breakdown of participants and the key themes that were evident. Quotes from respondents are included as evidence for themes provided.

Online forums Summary

A total of 76 people participated in the online forums as per Table 1 and Figure 1 – 3.

Participant	Number
Student	7
Parent	3
Teacher	16
Coordinator	25
Principal	10
Industry	15
Total	76

Table 1 – Participant category by number

Online forums elicited differing responses dependant on the participants level of engagement and experience with VET.

Teachers, students, and parents associated with C Courses were unsupportive of Draft Recommendation 1 and provided limited responses to Draft Recommendations relating to E Courses. Curriculum Coordinators and VET Coordinators provided a more balanced view of both C and E Course recommendations.

Principals from Colleges with C Courses were less supportive of the recommendation to redevelop C Courses into A/T/M/V or A/M/V Courses compared to those who do not offer them.

Industry and higher education provided suggestions to strengthen VET and its provision in ACT Senior Secondary education, rather than support or reject specific Draft Recommendations.

Problems associated with the integration of VET into BSSS A/T/M/V courses were frequently voiced, suggesting that the VET components and flexibility in assessment and learning is diminished.

ASQA regulatory standards and requirements were considered to be sufficient and, in some instances, identified as more beneficial than BSSS processes of quality assurance and assessment practices.

C Courses were identified as providing more authentic pathways to work and further VET study when compared to A/T/M/V Courses, despite the evidence in the Report contrary to this.

The overall benefits of vocational education and training in senior secondary education were identified and reinforced.

The 21st Century Learning Dispositions and General Capabilities were believed to be developed as a consequence of delivering competencies, even though they are not explicitly stated in the Training Packages and their level of development influenced by teachers rather than prescribed by curriculum documentation. This area was acknowledged needing attention.

Risk associated with obtaining qualified trainers and teachers was a repeated concern and A/T/M/V Courses were acknowledged as offering risk minimisation in this area.

Opportunities for C Courses to continue to be delivered at school-based RTOs with structural and implementation change was suggested.

Exploration of E Courses and their contribution to the ACT Senior Secondary Certificate were supported. The process and criteria for creating a preferred list of external providers was discussed and comments provided about assurances to prevent diminished student opportunities as a result.
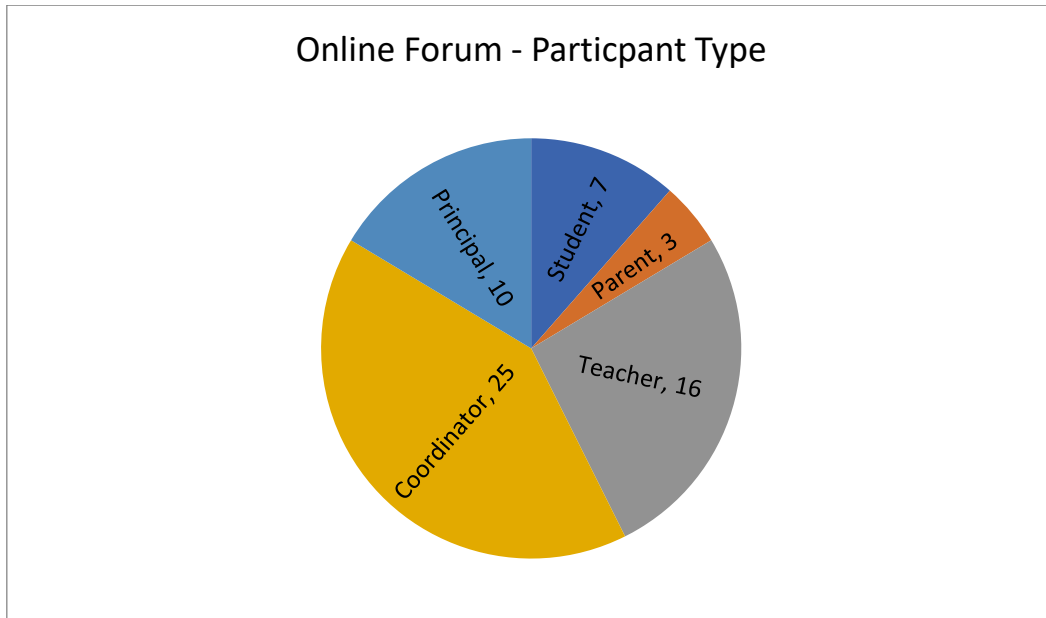

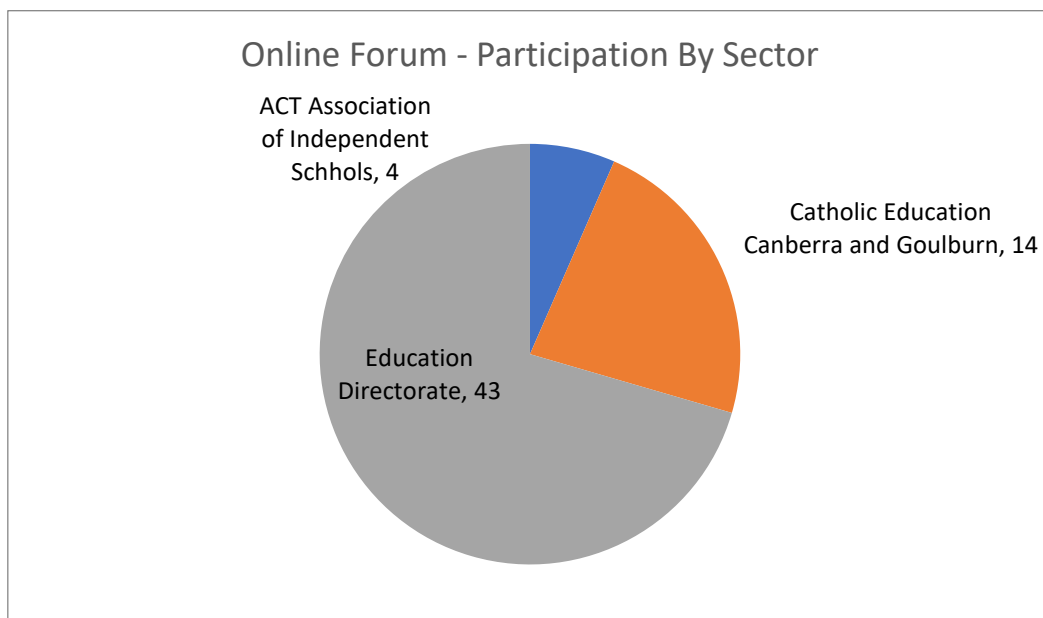Figure 1 – Online forum participants (does not include industry and tertiary education)

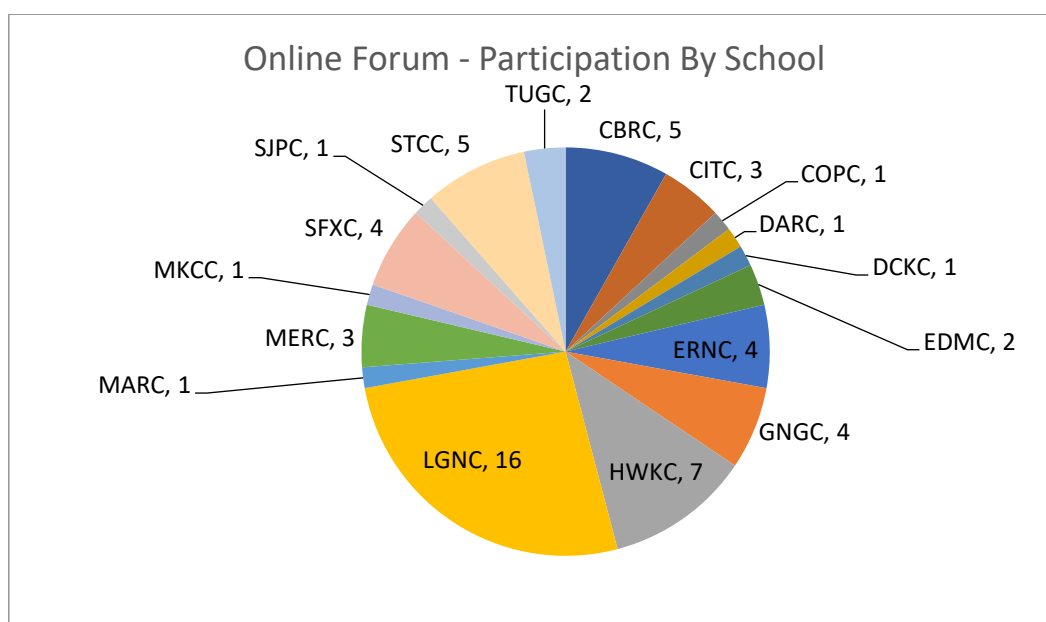Figure 2 – Online forum participants by senior secondary school sector

Figure 3 – Online forum participants by senior secondary school (see Acronyms)

Online forums – Feedback from teachers, students, and parent

Recommendation 1 - That C Courses be redeveloped as A/T/M/V or A/M/V courses.

Negative Feedback

- *"C Courses use Nationally Recognised Training Packages to inform and guide the delivery of content - this is highly structured, regularly reviewed and often encourages better and more relevant teaching and learning experiences than some of the accredited level of BSSS courses currently being run in college, as well as provide real world employment pathways. This cannot be upheld when the focus moves back to A-E grades and VET is secondary to that."*
- *"I would be concerned about a high rate of students voiding the courses or dropping out. We would be restricting our student's pathways choices to make them into compulsory A/T courses"*
- *"T/A/V model moves the focus away from VET and more towards the push for higher grades in an A-E format. Unfortunately, "High quality and industry relevant VET is important in supporting students to continue onto further education, training or employment" (pg 16) will not be easily maintained with the changes suggested... there is a reason why we created C Courses in the first place!"*
- *"There is a place for both C and A/T/M/V courses in BSSS offerings"*
- *"My concerns with redeveloping C to ATMV is you are adding another dimension onto the assessment (an A-E grade) so VET may not be delivered at the forefront. Validation occurs within "RTO's and does not involve BSSS, C Course specific moderation processes could allow for valid BSSS moderation to occur*
- *"Parents want reassurance that Vocational Education and Training is of high quality."*

Online forums – Feedback from principals, VET Coordinators and Curriculum Coordinators feedback

- *"The benefits of integration of VET into the A/T/M are lost when trying to massage things together. Disadvantage of competing demands on students"*

- *"The students have different expectations – In A/T/M/V courses they do not care as much about the V. Those who specifically choose a C Course really want that course in my experience."*

- *"The dual delivery of an A/T/M/V does restrict the industry focus. There may be more breadth with an A/T/M/V, but the Industry richness is watered down."*

- *"So my brief point really is not phasing them out, but reviewing them and with all of the wealth of knowledge in this this group and the fact is that the report has been so well written, and I think all of the studies support that review off sequels (sic) and looking at further scoping." (of C Courses)*

- *"How can we strengthen C Courses to meet BSSS requirements?"*

- *"Perhaps the possible solution, and maybe there's an opportunity further around the track to talk about this is to actually look at how we can strengthen the C Course requirements that we currently have."*

- *"C Course options are a valuable option over the T/A/V options for some students as you can target the teaching, learning and assessment components specifically to the competencies of the Cert - rather than do a cobbled-together version that meets both BSSS T/A assessment requirements as well as VET, and thus really meets the exact needs of neither."*

Positive support of Recommendation 1

- *"Finding a teacher that is VET qualified in a VET area, having industry experience and a current TAE was identified as a very large risk in the consistent delivery of VET.*

- *"Only focused on industry component without educational aspects of critical and creative thinking – goals of A Course not present."*

- C Courses *"are not focused on the industry skills and knowledge and the requirements of the training package you're not putting in their opportunities for education, such as the ability to critically think. And you know, there's 21st century learning skills that we know that we embed in our courses that are also put within the curriculum."*

- *"I see one of the risks of delivering a C/E course is if you lose your trainer. I'm halfway through. It makes it very difficult then to that continuity of education continuity. Of course, for students if you can't find someone with the relevant quals"*

- *"That's what I'm finding. Is that trying to actually be able to find teachers that can actually do the delivery of the C Courses is one of our biggest factors. We've been juggling quite a bit this year. I know that with a T&V, yes he (you can) can default back to."*

Survey Response Summary

A total of 15 people responded via the online survey. Comments and observations in some responses where identical to those received in written submissions.
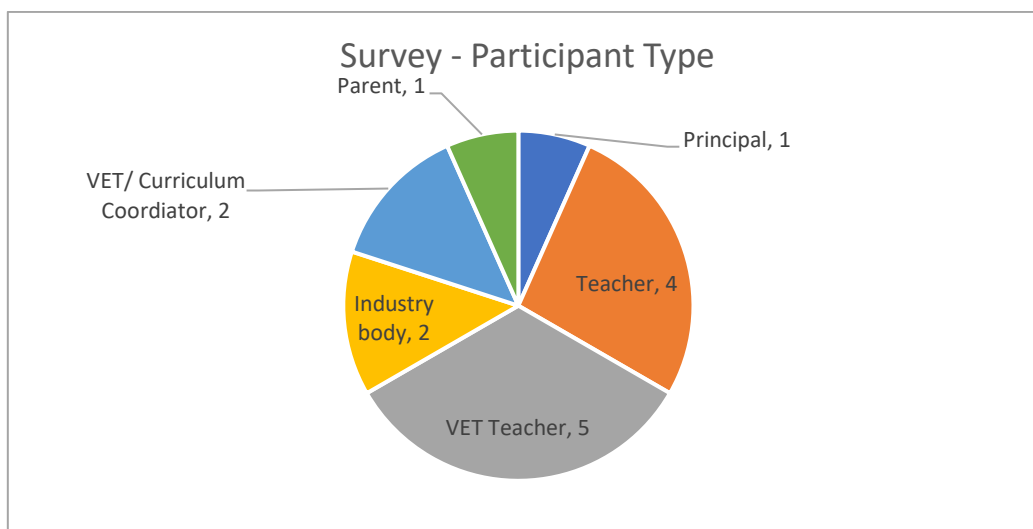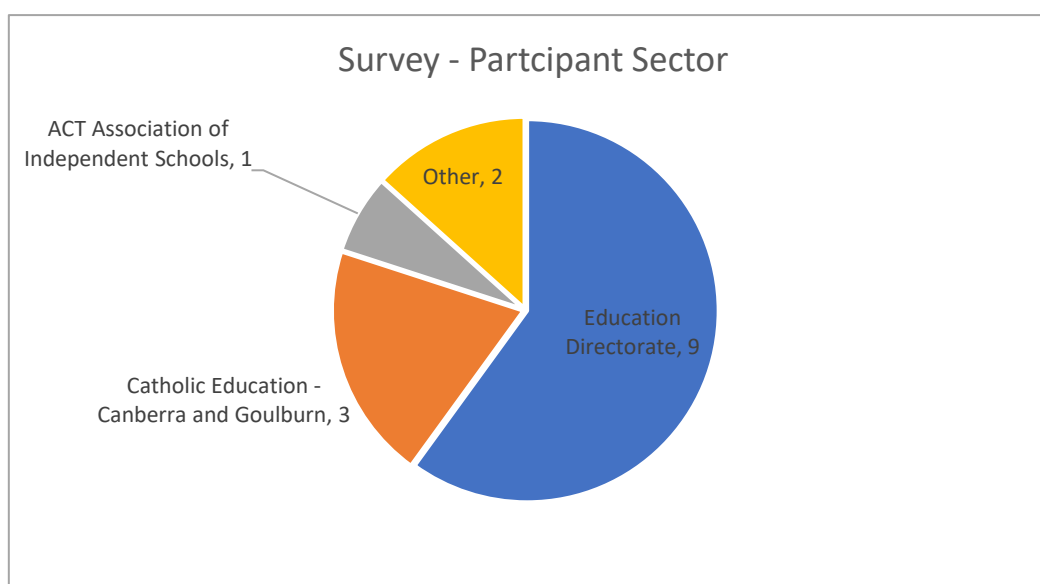

Figure 4 – Survey participant by role

Figure 5 – Survey participant by stakeholder sector (other includes, industry/peak body and parent)

Do you support the following recommendation? That C Courses be redeveloped as A/T/M/V or A/M/V courses.

Of the 15 survey respondents 71 % were not in support of Draft Recommendation 1 in the redevelopment of C Courses into A/T/M/V Courses. Several respondents provided alternative suggestions to ensure student opportunities in C Courses remain and are strengthened whilst others acknowledged the need for significant change.

- *"Rather than abolish C courses I would recommend that C courses be reviewed, addressing the issues of concern."*
- *"CBC does not support the recommendation. CBC is concerned the redevelopment of C courses into A/T/M/V or A/M/V courses will accentuate the issues raised in the Joyce Review (Strengthening Skills) and Shergold Review (Looking to the Future). CBC is also concerned about the lack of reference to industry engagement and the virtues of Work-Based Learning (WBL) in the redevelopment of C Courses into A/T/MV or A/M/V courses."*

- *"Nationally Recognised Statements of Attainment or Qualifications should not be awarded to senior secondary students through A/T/MV or A/M/V or C/E Courses without mandatory work-based placements."*
- *"I do acknowledge that there are serious concerns as to the equity of the award of units not acknowledged by the C Course teachers present who were overly supportive. If C Courses remain, and I believe there is a case for them, they must be redeveloped with strict guidelines for moderation, attendance, assessment and achievement to ensure equity with the T/A/M courses."*
- *"I support the review of C Courses, however, considered consultation would be required on how the C Courses would be 'redeveloped' as A/T/M/V or A/M/V courses."*
- *"I support the consolidation of the VET courses to be redeveloped into A/M/V courses."*
- *"I like the 'idea' of C Courses, that is courses wholly focused on industry and the gaining of skills for that industry. Unfortunately, the reality was a set of courses that ranked below Accredited in terms of quality rather than 'a different form of quality'… The lack of clear expectations for students means that they are largely filled with disengaged students who don't turn up but get C Course credit, or they are run as extended R Unit programs by teachers on pet projects or interests with little focus on industry. For these two reasons I support ending C Courses. Let RTOs with a proper focus on industry teach the competency only programs."*
- *"The answer doesn't appear to be abolishing C Courses, but ensuring that, if it is within the scope of deliverable courses, it is resourced sufficiently and effectively."*

Do you support the following recommendation? That the level of contribution, achievement and quality assurance requirements of VET qualifications intended for consideration as E Courses on the ACT Senior Secondary Certificate are consistent with high expectations for students and support the integrity and quality of the certificate.

Of the 12 answers to this question, 91% were in support of Draft Recommendation 2, with provisions for understanding and clarity of the criteria applied for recognition on the ACT Senior Secondary Certificate.

- *"Tentative yes as I would need to know the requirements before passing judgement."*
- *"Private providers dealt with by this schools offer excellent service. Who will judge the provider standard? Hopefully the users - students and schools - will be asked. High expectations for students are not confined to government and/or school providers. It is not apparent at the school level that the integrity or quality of the certificate has been damaged by private providers"*

Do you support the following recommendation? That E Courses continue to be delivered by external providers only.

Of the 11 answers to this question, 73% were in support of Draft Recommendation 3.

- *"Yes, with the caveat that there is not a recommended provider list."*
- *"Some courses and qualifications being delivered through schools are at a much higher standard than external RTOs."*
- *"Is this not by definition what an E Course is? What should be noted in addition is that (p19) E courses are directed equally to adults and students at school. Thus, the recommendations of the Review on one hand see a disadvantage in adult oriented training in C Courses but no disadvantage in an E Course. This is inconsistent and confusing on any reading of the Review."*

Do you support the following recommendation? That the BSSS establish an approved list of external non-school based RTOs, providers, and qualifications.

Of the 12 answers to this question, 67% were in support of Draft Recommendation 4 with further comments seeking further information and considerations, most notably what criteria would be applied to RTOs for qualifying of a list and provisions to ensure student access and choice is not limited.

- *"I am concerned about the process involved in determining the approved list of providers and qualifications. Is this a necessary and worthwhile use of the time that would be involved in this process? Is there a better use for the resources that would be required for this task; that would be of benefit to all schools and all course areas rather than a small subset?"*
- *"This goes against procurement rules, reduces student outcomes as not all RTO's have scope to deliver all the qualifications and discredits RTO's that aren't on the list. ASQA is responsible to audit RTOs to ensure compliance, not the BSSS Competition breeds better RTO's and student outcomes."*
- *"The Canberra Business Chamber (CBC) supports the recommendation in principle, however, has concerns regarding the rationale used to form the recommendation. What specific evidence exists to support the quality assurance concerns the BSSS holds regarding the delivery of E Courses by non-Government RTOs in the ACT? Specifically, what quality assurance processes and standards of delivery and accountability are observed by CIT that are not observed by the non-Government training sector?"*
- *"Seems reasonable if they want their programs recognised on the Year 12 Certificate"*
- *"Tentative on knowing what the requirements will be. The preferred provider list sounds complex (what would RTOs need to provide to satisfy the BSSS? Are these going to be all programs run by the RTO?"*

Any other comments:

- *"Could the C Course classification merge with the E Course classification, but be administered through ACS, where VET Coordinators can input the units of competency just like the A/T/M/V courses are currently done, which a student and school declaration of achievement?"*
- *"Unsure where ASBAs are fitting (still E Courses or will these be a different classification?) but wanted to support the continuation and increased support for these programs"*

Written Submissions Summary

There were 21 written submissions were received during public consultation. Comments in some responses were identical to those received in the survey. Of the three feedback mechanisms the written responses where most limited in the breadth of sector and school engagement.

Of the 21 written submissions received the majority were supportive of C Courses continuing in the context of their school with little reflection on the risks identified in the Report. A small number contained suggestions for the continuation of C Courses with revised implementation and quality assurance processes, distinct and separate from BSSS endorsed A/T/M/V. Limited feedback was provided on Draft Recommendations 2 – 4 associated with E Courses.
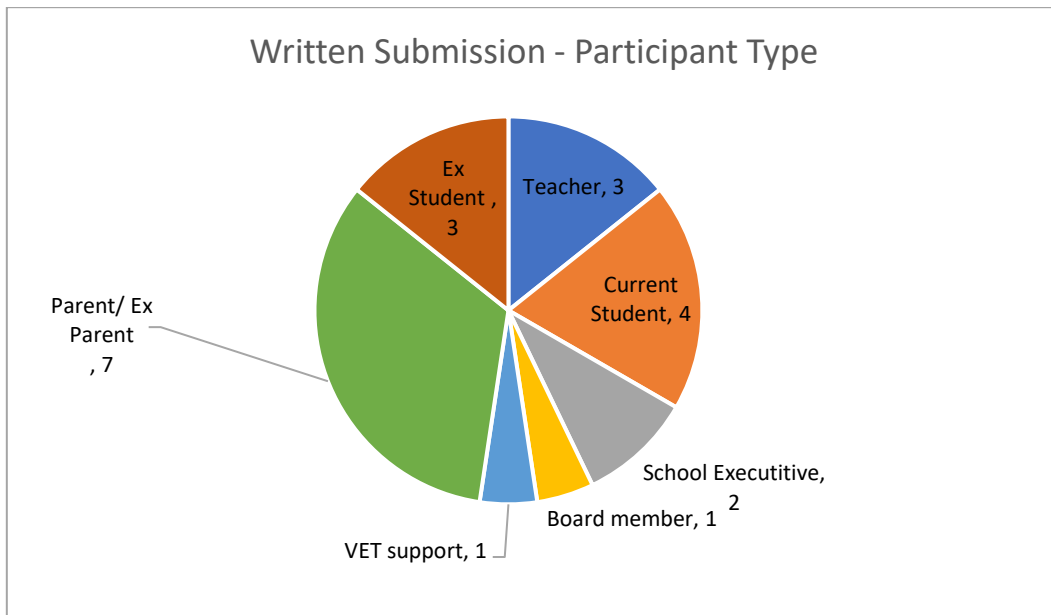
Written Submission - Participant Type

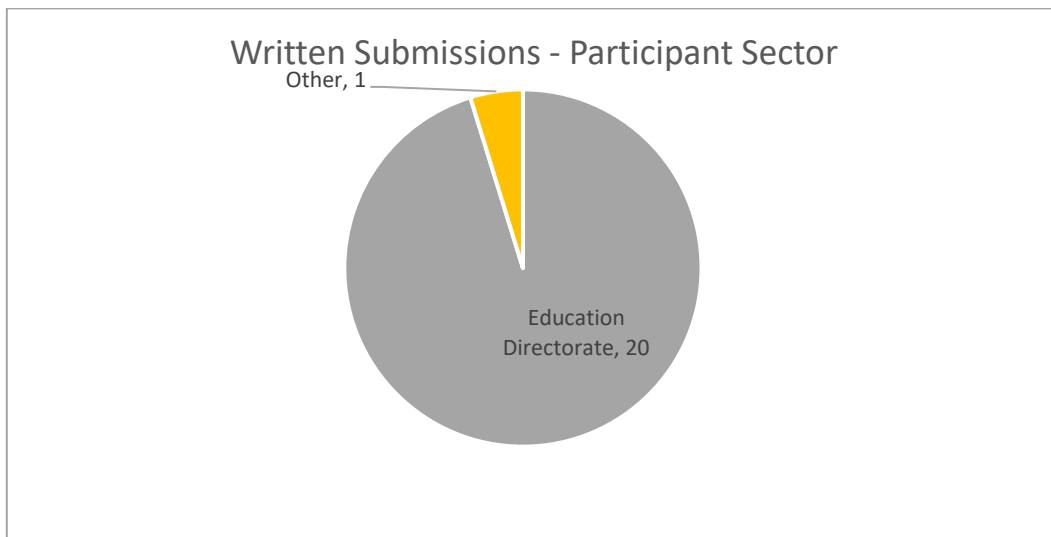Ex Student , 3

Teacher, 3

Current Student, 4

Parent/ Ex Parent , 7

School Executitive, 2

Board member, 1

VET support, 1

Figure 6 – Written submission participant type

Written Submissions - Participant Sector

Other, 1

Education Directorate, 20

Figure 7 – Written submission participant sector (other includes Board member)

Written Submissions - Education Directorate Participants

VET Support, 1

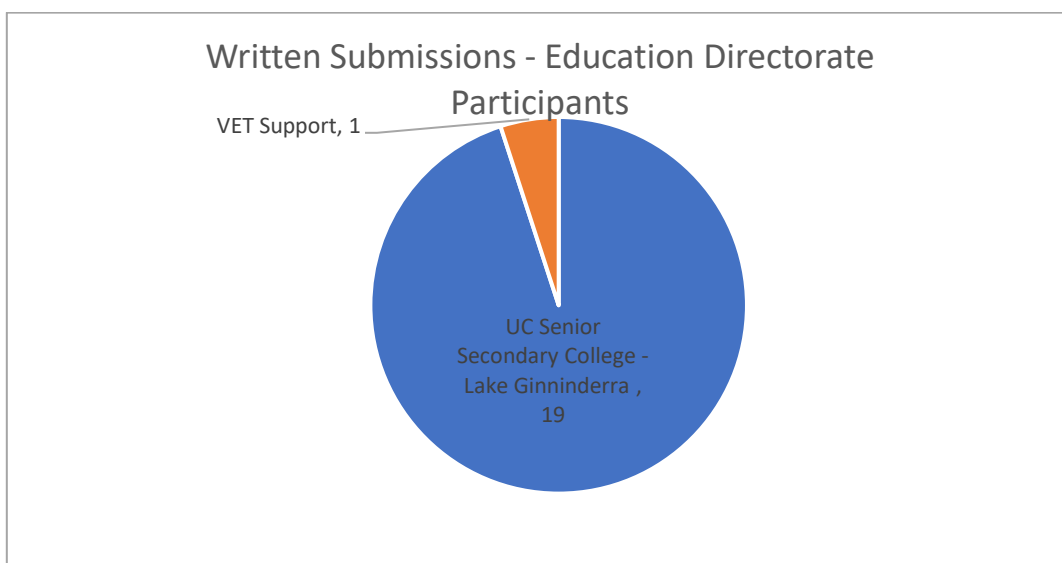UC Senior Secondary College - Lake Ginninderra , 19

Figure 8 – Written submission– Education Directorate participants

Written submissions C Course feedback

Responses proposed C Courses to have continued benefit to student outcomes, were valued and unable to be suitably transitioned if redevelopment into A/T/M/V Courses was to occur. Few respondents specifically addressed the risks proposed in the Report, with some responses suggesting C Courses are more demanding than T Courses in their school.

The review of C Courses was acknowledged and supported, in line with the *Shape of the ACT Senior Secondary Curriculum* and BSSS Course Design Specifications. Further suggestions around strengthening course design and quality assurance measures were provided in lieu of redevelopment:

- *"Develop communities of practice (or utilise existing) to review and redevelop quality assessment tasks which include industry specific simulations and real work tasks containing the four dimensions of competency to ensure the task has the rigour and complexity required."*
- *"Several submissions to this review and discussion at forums have suggested that more rigorous assessment and moderation processes for C Courses could be developed. We support such submissions, and suggest that more involved processes are required"*
- *"Rather than redevelop C courses into A/T/M/V or A/M/V courses as recommended, strengthen C Courses, specifically their documentation and processes and include clearly defined BSSS expectations to support their continued development, implementation, quality assurance and delivery."*
- *"We acknowledge the most recent advancements in curriculum development in the ACT as expressed in the Shape of the ACT Senior Secondary Curriculum and agree with the need for courses to capture these principles. Since the new design specifications were written a multitude of courses in the ACT have undergone redevelopment. As such, we are of the view that the redevelopment of the C Courses is warranted, not their discontinuity."*
- *"We propose that:*
  - *C Courses be redeveloped as C Courses, not A/T/M/V or A/M/V courses*
  - *C Course development and delivery be more clearly aligned to contemporary curriculum design and intent*
  - *C Courses assessment and moderation be closely monitored to ensure the integrity of the qualifications inherent to them and the benefits that accrue to students"*
- *"The review committee has recommended that C Courses be redeveloped into A/T/M/V or A/M/V courses. Should this recommendation be enacted, we suggest that careful consideration be given to the development of such courses so as to not limit the opportunities the current C Courses offer students."*
- *"As such careful mapping of content descriptors and competencies will therefore be required in the redevelopment of C Courses"*
- *"I propose that C Courses remain, but instead the rules around their use and implementation be more closely monitored as to ensure the integrity of the qualification and maintain benefits to the students that would otherwise be lost in a T/A/V model"*

Written submissions E Course feedback

Respondents neither agreed nor disagreed overwhelmingly with the recommendations associated with E Courses. More comment was provided around the construction and provision of a list of providers and what criteria would be applied in its creation. Feedback supports the proposed exploration of E Courses approved for credit on the ACT Senior Secondary Certificate and their providers.

- *"Provision of a 'How to Guide' for the submission of E Course applications with clearly defined processes, checklist and documented timeframes in which applications will be processed."*
- *"Recommendation 4 – Rather than develop an approved list of external non-school based RTOs, providers, and qualifications, why not revise and strengthen current practice? Limiting providers may reduce the number of VET qualifications and statements of attainments that students can access minimising outcomes for students."*
- *"RTOs, providers and qualifications are already heavily regulated under ASQA with strict compliance standards required and raises a number of questions including:*
  - *What is the benefit of having such a list?*
  - *What is the process of becoming a provider registered on this list?*
  - *What are the criteria that providers would need to meet and who determines these?*
  - *Timeframe in which applications for providers are processed given current staffing constraints in the BSSS*
  - *Criteria for selection"*

Next Steps

The Review Committee will consider feedback obtained during public consultation to help inform the final recommendations in The Review of C and E Course Classifications for the approval of the Board of ACT Senior Secondary Studies.

Acronyms

VET	Vocational Education and Training
BSSS	Office of the Board of Senior Secondary Studies
ASBA	Australian School-Based Apprenticeship
A/T/M/V	Accredited/Tertiary/Modified/Vocational BSSS course
A/M/V	Accredited/Modified/Vocational BSSS course
E	External vocational course
C	Competency only BSSS course
RTO	Registered Training Organisation
ASQA	Australian Skills and Qualifications Authority
TAE	Training and Education qualification
CBRC	Canberra College
COPC	Melba Copland Secondary School
DCKC	Dickson College
ERNC	Erindale College
HWKC	Hawker College
MARC	Marist College
MKCC	St Mary MacKillop College
SJPC	St John Paul II College
TUGC	Tuggeranong College
CITC	CIT Pathways College
DARC	Daramalan College
EDMC	St Edmund's College
GNGC	Gungahlin College
LGNC	UC Senior Secondary College - Lake Ginninderra
MERC	Merici College
SFXC	St Francis Xavier College
STCC	St Clare's College