



Review of C and E Course Classifications

Regulation Impact Statement

2021

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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: Public Consultation Report.

Executive Summary

This Regulation Impact Statement assesses current policy and procedures for BSSS C and E Course Classifications in relation to the functions of the Board, *BSSS Policy and Procedures* and recent national reports.

The problem

An analysis of *BSSS Policy and Procedures* indicates lapses in policy coherence across A/T/M/V, C and E Course Classifications and alignment with recent national reports.

Need for action

Inconsistencies in *BSSS Policy and Procedures* between the A/T/M/V and A/T/M, and C and E Course Classifications undermine and diminish the integrity of the ACT Senior Secondary Certificate.

Action is needed to align current policy and procedures for C courses with A/T/M/V and A/M/V courses and strengthen requirements for recognition of E Courses the ACT Senior Secondary Certificate.

Policy coherence and consistency across all course classifications will guarantee that all ACT senior secondary students receive their learning entitlement and will strengthen vocational education in the ACT.

Standard quality assurance processes and procedures applied to all course classifications guarantees equity across the system, supports school leaders with data for school improvement and maintains the integrity of the ACT Senior Secondary Certificate.

Options

This Regulation Impact Statement outlines three policy options for action:

1. Status quo

- a. The C Course classification is given to a Board accredited vocational education and training program that is appropriate for students in Year 11 and 12. It is delivered and assessed by a Registered Training Organisation (RTOs) that has been approved by the BSSS (section 5 (b) BSSS Act 1997) and registered by the national VET regulator ASQA (Australian Skills Quality Authority) under the Standards for Registered Training Organisations (RTOs) 2015.
- b. E Course classification is given to all externally delivered courses which lead to a nationally recognised vocational qualification (VET Certificate or Statement of Attainment) delivered by an external Registered Training Organisation (RTO).
- c. E classification is also given to Australian School Based Apprenticeships (ASBAs) for:
 - Structured training and on-the job training provided by an external RTO, and
 - On-the-job training for an ASBA undertaking the structured training at school, where the school is the RTO.

2. Draft Recommendations released for public consultation

- a. That C Courses be redeveloped as A/T/M/V or A/M/V courses.
- b. 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.
- c. That E Courses continue to be delivered by external providers only.
- d. That the BSSS establish an approved list of external non-school based RTOs, providers, and qualifications.

3. Preferred option

- a. That the five C Courses (Horticulture, Outdoor Recreation, Live Production Services, Music Industry, and Musical and Stage Performance) currently not available as A/T/M/V or A/M/V courses be redeveloped as new A/T/M/V or A/M/V courses. (Note: The remaining three C Course areas are currently available as A/T/M/V or A/M/V integrated courses.)
- b. That the redevelopment of the five C Courses (Horticulture, Outdoor Recreation, Live Production Services, Music Industry and Musical and Stage Performance) into new A/T/M/V or A/M/V courses take place in 2022 and be available for delivery from 2023.
- c. That the BSSS develop Professional Learning opportunities to support the implementation of BSSS courses integrating a VET Training Package.
- d. That C and E Course Classifications be phased out and superseded by the External VET Credit Units Classification by the end of 2023.
- e. That the BSSS liaise with RTOs for the recognition of External VET Credit Units on the ACT Senior Secondary Certificate.
- f. That the BSSS Curriculum Advisory Committee (CAC) and Assessment and Certification Committee (ACC) explore the appropriate levels of contribution of External VET Credit Units towards the requirements of the ACT Senior Secondary Certificate.
- g. That the BSSS CAC and ACC develop policy and procedures for recognition of External VET Credit Units on the ACT Senior Secondary Certificate.
- h. That the BSSS establish policy and procedures, and a schedule of RTOs and qualifications approved by the BSSS, for delivery and recognition of External VET Credits on the ACT Senior Secondary Certificate.
- i. That school-based RTOs have the flexibility to deliver BSSS accredited A/T/M/V or A/M/V Courses or apply for registration with the Board as providers of External VET Credit Units of identified Training Packages, for recognition on the ACT Senior Secondary Certificate.
- j. That the BSSS establish a panel to advise the Board on External VET Credit Unit expectations and processes.

The preferred option

The targeted reform proposed in Option 3 represents a critical step towards strengthening VET recognised on the ACT Senior Secondary Certificate and affords flexibility for school-based RTOs to provide a range of quality VET pathways for students. These recommendations address inconsistencies in *BSSS Policy and Procedures* between the A/T/M/V and A/M/V, and C and E Course Classifications.

Option 3 upholds the integrity of the ACT Senior Secondary Certificate by addressing the inconsistencies in *BSSS Policy and Procedures* between the A/T/M/V and A/M/V, and C and E Course Classifications. The inconsistencies in *BSSS Policy and Procedures* between the A/T/M/V and A/M/V, and C and E Course Classifications are as follows:

- In the context of the ACT Senior secondary Certificate, the A/T/M/V and A/M/V Course structure maximises the security of the student learning entitlement whereas C and E Courses carry significant risk.
- For A/T/M/V or A/M/V Courses, student achievement is reported A-E. For C Courses, student achievement is reported as 'Pass' or 'Participated'. For E Courses, students are awarded a 'Pass' grade on units representing hours in structured learning activities.
- For A/T/M/V or A/M/V Courses student presentations are moderated using Board endorsed Achievement Standards. For C and E Courses, student presentations are not moderated against Board endorsed Achievement Standards or guidelines.

Developing C Courses into A/T/M/V or A/M/V courses supports school leaders and benefits students in the following ways:

- All BSSS courses will provide for the student learning entitlement (i.e., knowledge, skills, understandings, and values that will provide a foundation for their future contribution to Australia's society)
- Schools delivering BSSS A/T/M/V and A/M/V courses are supported by robust BSSS quality assurance processes including course accreditation, and statistical and system moderation. These processes maintain consistent standards and ensures equity across the ACT senior secondary system
- Consistent presentation and structure of courses listed on the ACT Senior Secondary Certificate, and
- The redevelopment of those C Courses currently not available as A/T/M/V or A/M/V courses will enable opportunities at a system level to create a professional learning community that has a shared understanding of senior secondary curriculum, focused on maximising learning outcomes for all students. This is difficult with curricula and assessment systems that lie predominately outside the purview of the BSSS.

Option 3 enables the Board to meet its legislative requirements while providing flexibility for school-based RTOs to continue provision of quality VET pathways for students.

The preferred option proposes to replace C and E Course Classifications with the External VET Credit Unit Classification. The BSSS External VET Credit Unit classification refers to recognition of Training Packages that are not integrated into BSSS courses.

School-based RTOs will have flexibility to deliver BSSS accredited courses integrating a Training Package or exercise their RTO status to deliver a Training Package and apply for External VET Credit Unit recognition. For example, a school-based RTO may choose to deliver the BSSS Hospitality course integrating a Training Package or alternatively deliver the supporting qualifications from the Tourism, Travel and Hospitality (SIT) Training Package.

If a school-based RTO chooses to deliver a Training Package that is not integrated into a BSSS course they may apply to the BSSS for recognition of qualifications/competencies on the ACT Senior Secondary Certificate as an External VET Credit Unit, or simply exercise their RTO status by certifying the student.

A school-based RTOs decision to work outside BSSS processes will mean that they are empowered to manage delivery of the Training Packages, AVETMISS, and provide certificates independently of the Board for students who complete the qualifications/competencies.

A key benefit expected from the recommendation is the support that the BSSS lends to schools through the provision of courses integrating a Training Package. School leaders will have confidence that students not only receive a VET qualification but also their broader learning entitlement. In addition, schools delivering BSSS Courses integrating a VET Training package will be supported through quality assurance processes and procedures including course accreditation, system moderation and professional learning opportunities.

The recommendations enable access for senior secondary students to a variety of external providers and increases the range of vocational education opportunities to access a wider variety of Training Packages.

The proposal to increase quality assurance measures for recognition of external VET safeguards students and maintains the integrity of the ACT Senior Secondary Certificate. Many RTOs are delivering high quality programs that provide opportunities for students to enhance their skills, provide industry experience and prepare them for a pathway beyond school. However, both nationally and locally, there is inconsistency in the transparency, accountability, and quality of the training by some providers.

As a result, some state and territory education departments and non-government schooling sectors have established preferred provider lists and prescriptions about the type of VET suitable for students in the senior phase of schooling.

An ACT Board of Senior Secondary Studies approved provider list will support schools in their endeavour to ensure that all students have access to quality VET programs. Applications for recognition of RTO's and Training Packages, and External VET Credit Units on the ACT Senior Secondary Certificate will be required to meet requirements approved by the Board.

The proposed recommendations will allow the Board to meet its legislative responsibilities and requirements pertaining to quality assurance and remove limitations in its capacity to consider and develop ways to strengthen vocational education in ACT schools.

The *BSSS Policy and Procedures Manual* will be amended to reflect these recommendations.

Current Setting

Overview

Vocational education is delivered in the context of ACT senior secondary education including the *Board of Senior Secondary Studies Act 1997*, school-based curriculum and continuous assessment, Alice Springs (Mparntwe) Education Declaration (2019), Australian Qualifications Framework (AQF), Australian Curriculum, Assessment and Reporting Authority (ACARA), *The Future of Education: An Education strategy for the next 10 years* (2018) and the Australian Professional Standards for Teachers (AITSL).

VET in schools has been the subject of discussion at national level. Recent reports, *Looking to the Future: Report of the Review of senior secondary pathways into work, further education and training* (2020), *Strengthening Skills: Expert Review of Australia's Vocational Education and Training System* (2019) and *Nurturing Wonder and Igniting Passion, designs for a new school curriculum: NSW Curriculum Review* (2020), encourage reflection on the role of VET and its contribution to the senior secondary certificate.

To maintain the currency of the certificate in the context of a technological and information rich global economy, it is essential that courses accredited by the Board of Senior Secondary Studies conform with legislative requirements and meet local and national expectations on what defines

quality senior secondary education. The essential question is: What should be recognised on the ACT Senior Secondary Certificate?

The BSSS Act requires that recognition of vocational education on the ACT Senior Secondary Certificate be quality assured using guidelines determined by the Board.

The BSSS Act Courses integrating a VET Training Package need to guarantee student learning entitlement informed by the AQF, ACARA and the Alice Springs (Mparntwe) Education Declaration.

The delivery of VET Training Packages in schools needs to reflect the Australian professional standards for teachers (i.e., expectations for teaching, learning, student wellbeing, reporting and professional learning).

Vocational education in senior secondary schools must not separate knowledge-based and skills-based learning. Courses accredited by the Board must recognise the entitlement of each student to knowledge, skills and understandings that provide a foundation for successful and confident learners.

The Board of Senior Secondary Studies

The ACT Board of Senior Secondary Studies (ACT BSSS) is a statutory authority responsible for the certification of senior secondary school studies in government and non-government schools in the Australian Capital Territory.

The *Board of ACT Senior Secondary Studies Act 1997* protects students. *BSSS Policy and Procedures* underpinning the functions of the Board provide equity and fairness across the system. Key functions of the Board pertinent to this review are to:

- accredit or register courses taught by recognised educational institutions
- approve recognised education institutions for teaching vocational education courses
- establish guidelines for the development of courses
- establish principles and procedures for the assessment of students and the moderation of those assessments
- provide certificates and transcripts of student attainments
- provide information on the performance of students and former students
- provide information on the policies and procedures of the Board, and
- approve specialist education providers.

The ACT Senior Secondary System

The ACT operates a system of school-based curriculum and assessment within the policy and procedures of the ACT Board of Senior Secondary Studies (BSSS).

School-based curriculum means that college teachers are involved in all curriculum development and that colleges determine what courses they offer to students. There is a commitment to offering high quality educational programs from a wide range of academic and vocational areas.

Assessment in the ACT is continuous school-based assessment. This means there are no external subject-based examinations. Courses are taught and assessed unit by unit. A unit of study is organised around a particular theme or skillset and has a value based on the time the unit took to deliver: One standard unit of study towards a Senior Secondary Certificate represents a minimum of 55 hours of structured learning activities generally over one semester.

Moderation is conducted every semester to ensure comparability of grades from different schools and the ACT Scaling Test (AST), a higher order thinking examination, is used to compare Tertiary scores from different schools for calculation of the ATAR.

Principles underpinning Senior Secondary Education in Australia

Principles underpinning senior secondary education in Australia include the Alice Springs (Mparntwe) Education Declaration (2019), the Australian Qualifications Framework (AQF) and the establishment of the Australian Curriculum, Assessment and Reporting Authority (ACARA).

The Alice Springs (Mparntwe) Education Declaration (2019) sets out the vision for education in Australia. It is a commitment to improving educational outcomes, for all young Australians to become confident and creative individuals, successful lifelong learners, and active and informed members of the community.

Each state and territory issue a Senior Secondary Certificate of Education (SSCE) to signify a student's completion of senior secondary education. Each certificate is issued in accordance with the Australian Qualifications Framework (AQF). The AQF Framework specifies the standards for educational qualifications in Australia. The purpose of the Senior Secondary Certificate of Education qualification type is to provide students with knowledge, skills, and values for diverse pathways to further learning, work, and effective participation in civic life.

The Australian Curriculum, Assessment and Reporting Authority (ACARA) sets the curriculum expectations for what all Australian students from Foundation to Year 12 should be taught, regardless of where they live or their background. The curriculum recognises the entitlement of each student to knowledge, skills and understandings that provide a foundation for successful and confident learners.

VET for ACT Students

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.

C Course classification refers to courses that are competency based. These courses are solely based on the requirements of Training Packages that have been created to meet the training needs of an industry or a group of industries.

C Courses are not developed under a BSSS curriculum framework, removing the requirement to report on student outcomes and Achievement Standards using A-E grades. Instead, the focus is on whether students have demonstrated the specific skills in the relevant Training Package or not.

E Course classification refers to all externally delivered VET courses, i.e. delivered by non-school based RTOs. E Course classification refers to all externally delivered VET Courses such as a CIT short course or a student undertaking a VET Certificate outside school, and ASBAs through either school-based or external RTOs.

What is the problem to be solved?

This Regulation Impact Statement assesses current policy and procedures for BSSS C and E Course Classifications in relation to the functions of the Board, *BSSS Policy and Procedures* and recent national reports.

An analysis of *BSSS Policy and Procedures* for C and E Course Classifications indicates inconsistencies within *BSSS Policy and Procedures* for senior secondary curriculum, quality assurance, assessment, and certification.

Key issues to be solved include:

Inconsistency in BSSS Policy and Procedures:	BSSS A/T/M/V or A/M/V Courses	C and E competency only Courses
Curriculum design	Written under a BSSS endorsed framework (learning area rationale, goals, advice for assessment and Achievement Standards A-E grades)	C and E Courses are not based on a curriculum and are focused on the development of a set of specific skills known as competencies for an industry area. They are not written under a BSSS endorsed framework
	Courses are written for the context of senior secondary education, aligning with the Australian Professional Standards for Teachers and the purpose of senior secondary education qualification type (i.e., qualifies individuals with knowledge, skills, and values for diverse pathways to further learning, work, and effective participation in civic life)	Training Packages are written for adults. They are not developed with the focus of senior secondary education. Each competency is described as the skill to be demonstrated. They are developed for delivery by trainers, not teachers.
	Courses reflect Board Endorsed design specifications guaranteeing student learning entitlement including the 21 st Century Skills, General Capabilities, and Cross Curriculum Priorities	C and E Courses are not written under course design specifications that guarantee student learning entitlement and they are not based on the 21 st Century Skills, General Capabilities, and Cross Curriculum Priorities. Some Training Packages may at times refer to some literacy, numeracy or social skills related to working with others, based on the skill being taught.
Quality assurance	Student work are assessed and quality assured (system moderation) using Board Endorsed Achievement standards	C and E Courses are not assessed and quality assured (system moderation) using Board Endorsed Achievement standards. Instead, they are subject to ASQAs processes.
Assessment	Assessment is based on A-E grades	The grades 'Pass' or 'Participated' are awarded depending on completion of any competencies attached to the unit.

Certification	Training Packages are constantly being updated. At times the rule changes result in conditions that schools cannot meet. When VET is embedded in A/T/M/V or A/M/V course, students are still able to complete a course, without the VET component	A student package is risk if the course is discontinued due to rule changes result in conditions that schools cannot meet through no fault of their own.
	The '90% participation rule' and '70% assessment rule' applies to A/T/M/V courses.	The '90% attendance rule' does not apply to E Courses but is awarded on student participation. The '70% assessment rule' does not apply to C and E Courses due to assessments not having percentage weightings.

This analysis raises another question. Current *BSSS Policy and Procedures* permit the maximum contribution of C and E Course credit to be half of the minimum requirement of the ACT Senior Secondary Certificate. What should be the maximum contribution External VET Credit Units or their equivalent and Units to the minimum requirements of the ACT Senior Secondary Certificate?

Why is action needed?

The inconsistencies in *BSSS Policy and Procedures* between the A/T/M/V and A/M/V, and C and E Course Classifications weaken vocational education in the ACT. The impact of this disconnect is the creation of silos that divides the ACT senior secondary system between 'us' and 'them'.

There are many examples of good practice in the delivery of VET to secondary school students. However, there is general agreement among stakeholders, and in the findings of previous reviews, about some aspects of vocational education in schools.

In 2019, ASQA identified VET in schools as one of the top five concerns presenting risk to the quality and reputation of VET. There is evidence that the arrangements supporting the delivery of VET to secondary school students may create specific drivers for non-compliance, which could compromise the quality of VET.

The *Senior Secondary Pathways Review* and the Joyce Review raised concerns about the quality of vocational education delivered to school students, including that VET in schools is inconsistent and perceived to be of a lower standard when compared to the other vocational training.

Action is needed to develop a shared understanding of vocational education in ACT senior secondary schools. Policy coherence and consistency at a system level is vital to strengthening vocational education in schools and guaranteeing equal opportunity for all students.

What policy options are being considered?

Option 1 – Status Quo

C Course Classification is given to a Board accredited vocational education and training program that is appropriate for students in Year 11 and 12. It is delivered and assessed by a Registered Training Organisation (RTOs) that has been approved by the BSSS (section 5 (b) BSSS Act 1997) and registered by the national VET regulator ASQA (Australian Skills Quality Authority) under the Standards for Registered Training Organisations (RTOs) 2015.

E Course Classification is given to all externally delivered courses which lead to a nationally recognised vocational qualification (VET Certificate or Statement of Attainment) delivered by an external Registered Training Organisation (RTO).

E classification is also given to Australian School Based Apprenticeships (ASBAs) for:

- Structured training and on-the job training provided by an external RTO, and
- On-the-job training for an ASBA undertaking the structured training at school, where the school is the RTO.

Under present arrangements:

- C Course will be redeveloped pending changes to Training Packages
- Requests to recognise an E Course on the certificate are assessed with attention to any duplication of content as well the numbers of hours of the course
- School based RTOs are not subject to guidelines for approval to deliver C Courses
- C Courses design specifications do not require students to be assessed using Board endorsed A-E Achievement Standards
- C Courses are not required to be accredited using Board endorsed guidelines
- C Course presentations submitted for system moderation are not required to be quality assured using Board endorsed A-E Achievement Standards
- C Courses are not required to differentiate teaching for diverse learners, and
- Evidence for recognition of E Courses on the ACT Senior Secondary Certificate is based on the number of hours of the course.

No changes to current *BSSS Policy and Procedures*.

Option 2 - Draft Recommendations released for public consultation

- a. That C Courses be redeveloped as A/T/M/V or A/M/V courses.
- b. 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.
- c. That E Courses continue to be delivered by external providers only.
- d. That the BSSS establish an approved list of external non-school based RTOs, providers, and qualifications.

Option 2 seeks to address the inconsistencies in *BSSS Policy and Procedures* between the A/T/M/V and A/T/M, and C and E Course Classifications.

A unified policy approach makes provision for expansion of a professional learning community that has shared understanding of senior secondary curriculum and is focused on maximising learning outcomes for all students.

The redevelopment of C Courses into A/T/M/V or A/M/V courses creates coherence and consistency across BSSS Courses. Developing C Courses into A/T/M/V or A/M/V courses will ensure that students receive their learning entitlement. The Board recognises the learning entitlement of senior secondary education to core knowledge, skills, understandings, and values that will provide a foundation for their future contribution to Australia's society.

Delivery of BSSS A/T/M courses integrating a Training Package are supported by robust quality assurance processes. Schools are required to submit presentations including assessment tasks and student work for system moderation. Grades assigned to presentations are checked against Achievement Standards. In addition, compliance matters including Training Package requirements, scope and competencies are checked. This process ensures equity across the ACT senior secondary system, which in turn supports students.

E Courses enable access for senior secondary students to a variety of external providers and increases the range of vocational education opportunities to access a wider variety of Training Packages. These are opportunities that are either not available for delivery by school RTOs or are not possible to deliver in a simulated school environment.

The proposal to increase quality assurance measures for recognition of external VET protects students and maintains the integrity of the ACT Senior Secondary Certificate. Many RTOs are delivering high quality programs that provide opportunities for students to enhance their skills, provide industry experience and prepare them for a pathway beyond school. However, both nationally and locally, there is inconsistency in the transparency, accountability, and quality of the training by some providers.

As a result of these concerns, some state and territory education departments and non-government schooling sectors have established preferred provider lists and prescriptions about the type of VET suitable for students in the senior phase of schooling.

An ACT Board of Senior Secondary Studies approved provider list will support schools in their endeavour to ensure that all students have access to quality VET programs. Applications for recognition of External VET Credit Units on the ACT Senior Secondary Certificate will be required to provide meet guidelines approved by the Board.

The *BSSS Policy and Procedures Manual* will need to be amended to reflect these recommendations.

Option 3 – Preferred Option

- a. That the five C Courses (Horticulture, Outdoor Recreation, Live Production Services, Music Industry, and Musical and Stage Performance) currently not available as A/T/M/V or A/M/V courses be redeveloped as new A/T/M/V or A/M/V courses. (Note: The remaining three C Course areas are currently available as A/T/M/V or A/M/V integrated courses.)
- b. That the redevelopment of the five C Courses (Horticulture, Outdoor Recreation, Live Production Services, Music Industry and Musical and Stage Performance) into new A/T/M/V or A/M/V courses take place in 2022 and be available for delivery from 2023.
- c. That the BSSS develop Professional Learning opportunities to support the implementation of BSSS courses integrating a VET Training Package.
- d. That C and E Course Classifications be phased out and superseded by the External VET Credit Units Classification by the end of 2023.
- e. That the BSSS liaise with RTOs for the recognition of External VET Credit Units on the ACT Senior Secondary Certificate.
- f. That the BSSS Curriculum Advisory Committee (CAC) and Assessment and Certification Committee (ACC) explore the appropriate levels of contribution of External VET Credit Units towards the requirements of the ACT Senior Secondary Certificate.
- g. That the BSSS CAC and ACC develop policy and procedures for recognition of External VET Credit Units on the ACT Senior Secondary Certificate.
- h. That the BSSS establish policy and procedures, and a schedule of RTOs and qualifications approved by the BSSS, for delivery and recognition of External VET Credits on the ACT Senior Secondary Certificate.
- i. That school-based RTOs have the flexibility to deliver BSSS accredited A/T/M/V or A/M/V Courses or apply for registration with the Board as providers of External VET Credit Units of identified Training Packages, for recognition on the ACT Senior Secondary Certificate.
- j. That the BSSS establish a panel to advise the Board on External VET Credit Unit expectations and processes.

The targeted reform proposed in Option 3 represents a critical step towards strengthening VET recognised on the ACT Senior Secondary Certificate and affords flexibility for school-based RTOs to provide a range of quality VET pathways for students. These recommendations address inconsistencies in *BSSS Policy and Procedures* between the A/T/M/V and A/M/V, and C and E Course Classifications.

Option 3 upholds the integrity of the ACT Senior Secondary Certificate by addressing the inconsistencies in *BSSS Policy and Procedures* between the A/T/M/V and A/M/V, and C and E Course Classifications.

The inconsistencies in *BSSS Policy and Procedures* between the A/T/M/V and A/M/V, and C and E Course Classifications are as follows:

- In the context of the ACT Senior secondary Certificate, the A/T/M/V and A/M/V Course structure maximises the security of the student learning entitlement whereas C and E Courses carry significant risk.
- For A/T/M/V or A/M/V Courses, student achievement is reported A-E. For C Courses, student achievement is reported as 'Pass' or 'Participated'. For E Courses, students are awarded a 'Pass' grade on units representing hours in structured learning activities.
- For A/T/M/V or A/M/V Courses student presentations are moderated using Board endorsed Achievement Standards. For C and E Courses, student presentations are not moderated against Board endorsed Achievement Standards or guidelines.

Developing C Courses into A/T/M/V or A/M/V courses supports school leaders and benefits students in the following ways:

- All BSSS courses will provide for the student learning entitlement (i.e., knowledge, skills, understandings, and values that will provide a foundation for their future contribution to Australia's society)
- Schools delivering BSSS A/T/M/V and A/M/V courses are supported by robust BSSS quality assurance processes including course accreditation, and statistical and system moderation. These processes maintain consistent standards and ensures equity across the ACT senior secondary system
- Consistent presentation and structure of courses listed on the ACT Senior Secondary Certificate, and
- The redevelopment of those C Courses currently not available as A/T/M/V or A/M/V courses will enable opportunities at a system level to create a professional learning community that has a shared understanding of senior secondary curriculum, focused on maximising learning outcomes for all students. This is difficult with curricula and assessment systems that lie predominately outside the purview of the BSSS.

Option 3 enables the Board to meet its legislative requirements while providing flexibility for school-based RTOs to continue provision of quality VET pathways for students.

The preferred option proposes to replace C and E Course Classifications with the External VET Credit Unit Classification. The BSSS External VET Credit Unit classification refers to recognition of Training Packages that are not integrated into BSSS courses.

School-based RTOs will have flexibility to deliver BSSS accredited courses integrating a Training Package or exercise their RTO status to deliver a Training Package and apply for External VET Credit Unit recognition. For example, a school-based RTO may choose to deliver the BSSS Hospitality course integrating a Training Package or alternatively deliver the supporting qualifications from the Tourism, Travel and Hospitality (SIT) Training Package.

If a school-based RTO chooses to deliver a Training Package that is not integrated into a BSSS course they may apply to the BSSS for recognition of qualifications/competencies on the ACT Senior Secondary Certificate as an External VET Credit Unit, or simply exercise their RTO status by certifying the student.

A school-based RTOs decision to work outside BSSS processes will mean that they are empowered to manage delivery of the Training Packages, AVETMISS, and provide certificates independently of the Board for students who complete the qualifications/competencies.

A key benefit expected from the recommendation is the support that the BSSS lends to schools through the provision of courses integrating a Training Package. School leaders will have confidence that students not only receive a VET qualification but also their broader learning entitlement. In addition, schools delivering BSSS Courses integrating a VET Training package will be supported through quality assurance processes and procedures including course accreditation, system moderation and professional learning opportunities.

The recommendations enable access for senior secondary students to a variety of external providers and increases the range of vocational education opportunities to access a wider variety of Training Packages.

The proposal to increase quality assurance measures for recognition of external VET safeguards students and maintains the integrity of the ACT Senior Secondary Certificate. Many RTOs are delivering high quality programs that provide opportunities for students to enhance their skills, provide industry experience and prepare them for a pathway beyond school. However, both nationally and locally, there is inconsistency in the transparency, accountability, and quality of the training by some providers. As a result, some state and territory education departments and non-

government schooling sectors have established preferred provider lists and prescriptions about the type of VET suitable for students in the senior phase of schooling.

An ACT Board of Senior Secondary Studies preferred provider list will support schools in their endeavour to ensure that all students have access to quality VET programs. Applications for recognition of RTO's and Training Packages, and External VET Credit Units on the ACT Senior Secondary Certificate will be required to meet requirements approved by the Board.

The proposed recommendations will allow the Board to meet its legislative responsibilities and requirements pertaining to quality assurance and remove limitations in its capacity to consider and develop ways to strengthen vocational education in ACT schools.

The *BSSS Policy and Procedures Manual* will be amended to reflect these recommendations.

What is the likely benefit/costs of each option?

This section of the regulation impact statement discusses the benefits and costs of the three policy options being considered.

Option 1 – Status Quo

The benefits for schools include:

- schools have flexibility to adopt either A/T/M/V or C Courses for delivery, and
- schools' benefit from BSSS facilitating development of C Courses for accreditation.

The cost for schools:

- student work is not quality assured using ACT developed and Board endorsed Achievement Standards.

The cost for the ACT Senior Secondary system include:

- perpetuation of the inconsistencies in *BSSS Policy and Procedures* between the A/T/M/V and A/T/M, and C and E Course Classifications
- reputational damage by recognising C Courses on the BSSS Senior Secondary Certificate that are not quality assured using Board endorsed Achievement Standards
- continuation of silos and an 'us' and 'them' culture, and
- lost opportunity to develop a consistent and systemic approach to support VET in schools.

Option 2 - Draft Recommendations released for public consultation

The benefits for schools include:

- alignment of policy and procedures for A/T/M/V or A/M/V and C and E Course Classifications
- BSSS courses integrating a Training Package are quality assured against BSSS standards for accreditation
- BSSS courses integrating VET combine knowledge-based and skills-based learning
- school leaders are provided with assessment and grade data from system moderation processes to inform school improvement
- students receive their learning entitlement
- safeguards for students to ensure that their package is not at risk when there are changes in trainers or RTO scope, and
- an ACT Board of Senior Secondary Studies approved provider list will support schools in their endeavour to ensure that all students have access to quality VET programs.

The cost for schools:

- limited scope to provide students with competency only learning experiences.

Option 3 – Preferred Option

The benefits include:

- BSSS accredited courses reflect coherence and consistency of quality and design
- alignment of policy and procedures for all courses
- BSSS courses integrating VET combine knowledge-based and skills-based learning
- BSSS courses integrating a Training Package are quality assured against BSSS standards for accreditation
- school leaders are provided with assessment and grade data from system moderation process to inform school improvement
- students receive their learning entitlement
- safeguards for students to ensure that their package is not at risk when there are changes in trainers or RTO scope
- an ACT Board of Senior Secondary Studies approved provider list will support schools in their endeavour to ensure that all students have access to quality VET programs
- timeframe developed to enables BSSS to establish partnerships with teachers to co construct development of C Courses into A/T/M/V or A/M/V courses, and
- school based RTOs can either exercise their status and deliver a Training Package or deliver BSSS courses integrating a Training Package, maintaining flexibility and school autonomy.

Who did you consult and how does the preferred option incorporate their feedback?

The BSSS Secretariat, on behalf of the Review Committee, conducted focus groups events with key stakeholders including students, industry, higher education, parents, principals, Curriculum and VET Coordinators. The section should be read in conjunction with *The Review of C and E Course Classifications: Consultation Report*.

The preferred option incorporates stakeholder feedback in the following ways:

Item	Key themes raised in public consultation	Option 3 incorporates stakeholder feedback in the following ways:
1.	Stakeholders identified key knowledge, skills, and values that students should have gained from studying a BSSS course integrating a VET Training Package Course include critical and creative thinking, literacy and numeracy, problem solving, communication skills, interpersonal and collaboration skills.	Design specifications for A/T/M/V courses articulate knowledge, understandings, and skills in units. In contrast, C Course are competency only. Redevelopment of C Courses into A/T/M/V courses will guarantee that students receive their learning entitlement, supporting school leadership and maintaining the integrity of the ACT Senior Secondary Certificate.
2.	Stakeholders identified workload as a barrier to delivering BSSS courses integrating a VET Training Package.	The recommendation to develop Professional Learning opportunities on BSSS courses integrating a VET Training Package (TP) supports school leaders to build teacher capacity and confidence to delivers these courses. Provision for school-based RTOs to either choose to deliver a BSSS courses integrating a VET (TP) or exercise their RTO status and delivers the qualification provides school leaders with options to address student interest and staffing arrangements.

3.	The development of C Courses into BSSS A/T/M/V or A/T/M courses would force schools to abandon the delivery of VET.	Provision for school-based RTOs to either choose to deliver a BSSS courses integrating a VET (TP) or exercise their RTO status and delivers the qualification provides school leaders with flexible options to provide vocational education.
4.	Forcing schools to deliver BSSS Courses integrating a VET Training Package provides poorer outcomes for students, fewer Statements of Attainment, and full qualifications.	Provision for school-based RTOs to either choose to deliver a BSSS courses integrating a VET (TP) or exercise their RTO status and delivers the qualification supports school leaders with flexible to maintain their current program.
5.	Stakeholders generally expressed confidence in Nationally Recognised Training packages and trust ASQA requirements for RTOs.	Provision of BSSS Courses integrating a VET Training Package and BSSS External VET Credit Units ensures meets stakeholder expectations and maintains the integrity of the ACT Senior Secondary Certificate.
6.	C Courses address the needs of diverse learners (For example, students to have multiple attempts at a competency, allowing for greater success rates).	Provision of BSSS Courses integrating a VET Training Package and BSSS External VET Credit Units supports school leaders when meeting the needs of diverse learners. There is no requirement in A/T/M/V Courses that assessment used for determining the Achievement Standards is the only assessment used for assessing competencies.
7.	Competency only courses reduce the barrier for an industry professional to deliver a BSSS course and allows access to expertise and networks beyond the school.	Provision of BSSS Courses integrating a VET Training Package and BSSS External VET Credit Units supports school leaders to pursue partnerships with industry or engage industry professionals.
8.	Competency only courses provide a clear pathway to industry and industry richness.	Provision of BSSS Courses integrating a VET Training Package and BSSS External VET Credit Units supports school leaders with addressing student needs and interests.
9.	Support exploring approved external VET providers.	The preferred option incorporates this support for exploring approved external VET providers.
10.	Lack of clarity on the contribution of E and C Course on the ACT Senior Secondary Certificate.	The preferred option incorporates investigating the maximum contribution of external VET to the ACT Senior Secondary Certificate.

How will the chosen option be implemented?

Students will not be disadvantaged if C Courses are no longer available. With Board endorsement, C courses will be redeveloped as A/T/M/V or A/M/V courses.

Schools can adopt either new or existing courses to provide vocational education pathways for students. A student may undertake an Australian School-based Apprenticeship as an alternative to C Courses.

A transition strategy for will be developed to support reforms undertaken following the Review, to allow time for implementation and to ensure that students are not disadvantaged.

Teachers delivering C Courses will be provided with professional learning to support the transition from delivering C Courses to A/T/M/V or A/M/V courses.