

The operation, regulation and funding of private vocational education and training (VET) providers in Australia

Introduction

The TAFE Community Alliance welcomes the opportunity to provide a submission to the inquiry into the operation, regulation and funding of private vocational education and training (VET) providers in Australia, and to assert the need for a strong well-funded VET system in Australia with TAFE as its major provider.

The TAFE Community Alliance is an advocacy and strategy group that recognises the central role of the strong comprehensive public VET provider in the building of social, cultural and economic capacity of communities across NSW. Our website www.tafecommunityalliance.org tells a TAFE story of itself. The website has quotes from politicians and well-known citizens speaking about the value of TAFE. It has letters from students about how useful a TAFE education has been for them, at times life-changing.

As part of its advocacy role, the Alliance sought a commitment from political parties in NSW around the TAFE that should exist and be supported by government to provide quality training incorporating ongoing development of appropriate educational pedagogy. Whilst this inquiry is reaching beyond TAFE to private providers, we think that the issues raised about TAFE are a good starting point for the Federal Government to work from. The statement of commitment published by the TAFE Community Alliance said: "We expect a commitment to a statewide publicly-owned technical and further education system. We expect this system to grow and flourish as it meets the priorities of educational, social and industry policy. We do not expect this system to operate like a business to break even or make a profit, but a public education and training system serving society efficiently and providing value and quality for the public dollar."

In setting in place the policy and funding incentives for the states to establish an open market for vocational education and training, the Federal Government has moved the focus of VET from education, quality educational infrastructure and meeting students' needs to a business that primarily is concerned with the needs of employers, industry and private profit. These are two opposite ends of the spectrum. In order to deal with the problems that have been created and led to many private RTOs establishing themselves as businesses in the VET market and therefore eligible for government funding, governments at a federal and state level need to now re-establish VET as an educational sector with its main focus on quality

education and students. A number of academics and organisations have called on the Federal Government to conduct a review of VET, and to restore support and funding for TAFE. We join them in this call.

In our submission we have removed the names of particular private providers, but are happy to provide them if necessary to support our position.

i) The access private VET providers have to Commonwealth and state public funding

The TAFE Community Alliance acknowledges that there have always been private providers of vocational education and training, but by and large they were not in receipt of government funding. Government funding instead was retained for the public providers of VET, ensuring transparency, accountability and for the most part strong quality education, with <u>systems</u> to both identify student learning needs and develop appropriate educational programs, pathways and standards.

If the Federal Government is serious about addressing the many rorts obvious in the training market today, then it must again remove the enticement of funding for private providers. If they have a quality educational product to sell, then the market will ensure that there are customers who are interested in purchasing. Quality vocational education and training should not be compromised by the opportunity to make money, or by the cutting of funding to TAFE to prevent it continuing to provide quality education and student support services.

The very public experience of an RTO such as Vocation, has made it obvious how a private provider can use public funds to build a very lucrative company. Eventually the system caught up with Vocation, but not until millions of public dollars had been allocated to their operations.

The Australian newspaper ran a story on Vocation on 22 January 2015, which said: "The company was expecting to lose \$8m in the first half of this financial year, booking one-off expenses connected with the restructuring of its Victorian training businesses following an adverse ruling by the Victorian Department of Education and Early Childhood Development. Vocation warned that the debacle, where it was fined \$20m and forced to close its troubled BAWM and Aspin subsidiaries after the DEECD found the company had enrolled students "in inappropriate courses for their needs" and delivered "a lower-quality training experience" than intended, had meant lower student enrolment and a loss of referrals due to "negative sentiment"."

Unfortunately in this context very little has been said about the effect on the students, of the initial poor education and then the closing down of the private providers. It also appears that Vocation has moved to rebadge itself and continue operating.

Recommendation:

The Australian Government should:

- a. carry out an independent public interest / public good test into the companies profiting out of VET
- b. decide in the public interest whether companies providing vocational education and training should be able to trade on the stock exchange, and under what circumstances this should or should not occur;
- c. ensure that such companies are ineligible for public funding

iii) the regulatory regime private VET providers operate within

The following are examples of reports made to the TAFE Community Alliance and our comments and recommendations as a result. They indicate the need for a significantly tightened set of regulations and standards that should operate for private providers of VET:

1. Student support services and screening

Case study

A private college enrolled a student into a double Diploma in Counselling and Community Services with a fee of \$20000. The student received a free iPad. After 6 months of study the student was required to leave having been accused of plagiarism. The student had a history of: completing a CI in Basic Education and Cert II in ESOL. The student did not know how to do assignments. The student also had a hospitalisation for mental health problems. This led to compliance issues with Centrelink. None of these issues had been addressed by the college as there were no specialist support services. There was no prior screening of capability or suitability for the course. The student will have this debt long term.

Much has been written about these issues, but little done to actually address them. It appears fundamental that initial registration of private providers should not occur unless they meet very strict standards and this includes a history of successful provision of education. The new standards to come into operation this year for RTOs are not strong enough and we believe will not address many of these issues.

It is the responsibility of an education provider to ensure that it provides transparent, honest and ethical advice to students. This does not appear to be the case with many of the case studies that the TAFE Community Alliance has become aware of. There is a clear abuse of Training Packages pre requisites or Entry Requirements as in the case of CHC52008 Diploma of Community Services (Case management) as follows:

It is recommended that candidates have relevant work experience or qualification/s that indicates likely success at this level of qualification in a job role involving:

- The self-directed application of knowledge with substantial depth in some areas
- The exercise of independent judgement and decision-making
- The application of relevant technical and other skills.

Our evidence of people with no formal qualifications or work experience being accepted into diploma level qualifications is flagrant disregard and exploitation. Prospective students must be interviewed and screened prior to enrolment, and details kept of their prior educational qualifications. Where there is a considerable gap between prior qualifications and new enrolments, there must be justification signed off by the RTO. This may seem a lot of 'red-tape' but most of it is actually good educational practice. One of the main problems the VET sector appears to be confronting at the moment, is the inappropriate enticement and enrolment of students in qualifications that they are not ready to undertake.

Recommendation:

That all RTOs be required to have in place proper interviewing and screening processes for all prospective students, that requires the provision of validated documentation supporting prescribed prerequisites/entry requirements appropriate for enrolment of students in qualifications. Students with a disability need to be referred to a Disability Specialist to ensure the appropriate advice and referral.

ASQA has targeted certain qualifications that are considered to be 'at risk' such as the Certificate IV in Training and Assessment. It appears that there are many Diploma qualifications including those in Business and Community Services, that should also be targeted for additional scrutiny in relation to the appropriate enrolment of students.

Recommendation:

That resources be provided to ASQA to allow it to target certain qualifications where students appear to be inappropriately enrolled.

2. Students being aware of their rights, and processes for changing qualifications

The Alliance is being made aware of multiple cases on a daily basis where students have been placed in inappropriate courses or levels of courses in private colleges with no option to change direction or provider. Or they've been under pressure to enrol in inappropriate courses or levels.

Case Study

A student at a private college was enrolled in a Diploma whilst at school. It was the wrong course and the student had learning difficulties. Fortunately he contacted TAFE during the cooling-off period and was encouraged to withdraw. His parents thought they were doing the right thing, but were not aware of the consequences.

A major loss with privatization is the loss of a system where students have multiple entry and exit points and easy options for transfer. TAFE had professional teachers who could refer people to a suitable level eg Cert III or Diploma at point of enrolment. There was no financial interest in signing people up for a Diploma. The focus would be on the student's educational needs. Additionally, if a student was struggling with a Diploma, there would have been options to exit quite easily with a lower level qualification if students met the requirements. This opportunity needs to be available for students. This necessary flexibility conflicts with a business model that needs students to graduate no matter what.

At the same time, processes need to be put in place to ensure that any RTO has to make a student aware of their rights and to give them at least six weeks to reconsider whether they want to sign up to a crippling loan. The option to get out of this loan, to leave the qualification, needs to be made easy and transparent for students. This is particularly important in the VET sector which caters for students across multiple levels of ability and with varying levels of literacy, numeracy and decision making skills. It is obvious at this time, that some private providers are not providing students with the information they need, or in a form that is easy to understand.

Recommendation:

Students and prospective students need to be provided with clear and easy to understand advice, with access to interpreters if required, so that they are aware of how they may leave a course, transfer to another provider and/or relinquish their VET FEE-HELP loan. This must occur when students sign up for a course.

Cash and other incentives should not be offered but definitely cannot be given until after the census date.

Further work needs to occur so that multiple entry and exit points are still available to students, especially if they find a Diploma level qualification too difficult.

3. Ambiguous entry requirements for Diploma qualifications

The Alliance has been made aware of a number of issues relating to lack of entry requirements for Diploma courses.

Case Studies

- a) A student with an HSC but a poor ATAR making him ineligible for University, was enrolled by a private provider in Diploma of Digital Media Technologies. There were no entry requirements and no career guidance, leaving the student to drop-out with a \$17,000 debt. The qualification does nominate preferred pathways for entry.
- b) Two students enrolled in a Building Diploma. There were no entry requirements, prerequisites or preferred pathway for entry and they were encouraged to do the Diploma rather than Cert IV. One student was 35, the other almost 60. There was no assessment of their educational level. One had not completed year 9 and the other had completed year 10. Both struggled, the course was well above their capability and what they needed. Both now have debts and no qualifications.
- c) A young woman with Acquired Brain Injury had completed the HSC. She was encouraged to enrol in a double Diploma in Counselling and Child Care. She failed first semester and was given more time to complete her course, then failed in the second semester as well. She now has a very high debt and nothing to show for it. She came to TAFE as she was referred by a friend. TAFE advised her to study part time because of her disability (definitely not a double qualification) and advised her to study at Cert III level. The Diploma of Counselling has recommended entry requirements but the Diploma of Early Childhood Education and Care has no prerequisites, entry requirements or recommended pathways

Recommendation:

Qualifications, particularly at Diploma level and above, require standard consistent clear entry requirements, ensuring certificate level prerequisites and effective pathways are followed for Diploma entry These could be easily adapted from the AQF.

4. Conflict of Interests

Many private RTOs also operate in other parts of the VET sector, setting up what should be seen as a conflict of interest. The reasons for doing so often relate to access to students, student information or an opportunity to make more money. Examples include:

- operating as both an RTO and a Group Training Organisation
- operating as both an RTO and an Australian Apprenticeship Centre

Recommendation:

That ASQA (or an appropriate committee) be resourced to undertake further work on such Conflicts of Interest, and provide advice as to how these can be prevented and/or regulated.

iv) the operation of VET FEE-HELP

An increasing number of concerns as to the operation of private providers have arisen with the opening of further qualifications, mostly Diploma and above, and some CIVs, to the use of a student loan through VET FEE-HELP. The push to make Diploma courses subject to high fees and consequently forcing students to take out such loans, has been called by some 'a matter of equity'. It has however been very much responsible for changing the nature of VET. As described above,

students are often not now in the position to exit a qualification at a lower level if they find the 'going too tough'. This needs to be reconsidered and this option reinstated.

The following news report from the ABC on 10 October 2014, noted that:

"Concerns have been raised that some training colleges are using new government loans to sign up low-income earners to large debts. The ABC has learned some private colleges are targeting areas of Sydney with high rates of public housing and residents whose first language is not English. They offer costly training qualifications and sign people up to expensive government loans, sometimes without their knowledge.

The Government has this year received 17 reports of students being signed up to debts without knowing. There is particular concern colleges are using incentives such as laptops and cash-back offers to encourage students to sign up. The Government said it had this year received 13 complaints about aggressive marketing by agents working for training colleges. Education Department materials suggest offering incentives is unethical and such practices could potentially break the law.

In recent years, the Government has extended HECS-style university loans to all diploma courses and some Certificate IVs. The new scheme is now called VET FEE-HELP and has led to many new private training colleges opening their doors. Students who sign up to the debts do not have to make repayments until they earn more than \$53,345.

Recommendation:

The preferred option of the TAFE Community Alliance is that student fees for Diplomas and above be set at a rate that makes them accessible for students without taking out a loan, and that VET FEE-HELP only apply to degree courses.

Alternatively, regulations need to be set around the operation of VET FEE-HELP, perhaps having an independent body that will operate the loans and therefore prevent them being used as a money-making scheme.

Where the expected maximum income to be gained from the qualification is less than the the compulsory repayment threshold, the qualification should be free, avoiding debt burden for life for the student and government burden of maintaining the debt.

v. the quality of education provided by private providers, volume of learning requirements and graduate outcomes

The issue around volume of learning, especially length of courses and quality of educational delivery, has plagued the VET system for some time now, but has been exacerbated with the increased marketisation of the VET sector. VET standards and regulations have once again gone some way to trying to address this issue but not far enough. The Federal Government needs to ensure that students both get the education they pay for and that the skills they acquire will give them an excellent opportunity of being able to gain employment.

The Alliance has been made aware of students coming to TAFE to undertake further learning because the hours delivered by private providers, eg. in Languages, were too few. Issues around the appropriate qualifications and experience of teachers in some private providers also remains an area of concern as the following example highlights:

Case Study

A youth worker told TCA of how when he was living in Melbourne in 2011 he answered a job ad for a Community Services teacher at a College. He did not have a Cert IV in Training and Assessment but did have community services qualifications. The man who was interviewing him interrupted the interview to go outside for a cigarette and invited him to join him which raised alarm bells for the interviewee. After a short interview he showed the would-be teacher the classroom which was quite small with no ventilation, air conditioner, fan or heater and was told he would have 60 students. When he was offered the job he declined.

A report in The Australian in November 2014, entitled 'Most vocational colleges are failing quality standards' reported:

ASQA chief executive Chris Robinson said the regulator was concerned that some courses — included those paid for or subsidised by taxpayers — were "ridiculously short".

"We've been rejecting 7 per cent of applications from existing RTOs (registered training organisations) to be re-registered, which they have to do every five years," Mr Robinson said yesterday.

"The short courses are particularly concerning because people aren't getting the skills they should be getting, and it puts pressure on everyone else to cut their costs and cut their course times."

Mr Robinson said ASQA was targeting the aged-care industry, where some trainers were still offering three-week Certificate III courses that would take six months through a traditional TAFE college. "We found that one-third of the courses were under four months and we think most of them would not be adequate unless the learner has experience in the competencies required," he said.

Mr Robinson said some private training companies were issuing safety white cards for the construction industry after just half an hour's online training, rather than the recommended six hours — without even checking the students' identities.

This is echoed in an article in the Australian in September 2014, which says in part:

ASQA's audit found 75 per cent of existing training colleges were "unable to demonstrate compliance" with the core standard for "quality training and assessment". Even after being granted 20 days to rectify the problems, one in five colleges still could not comply.

"Of most concern is that almost 70 per cent of providers are unable to demonstrate compliance with (the standard) which deals with assessment, and 21 per cent of providers remain unable to demonstrate compliance even after the submission of rectification evidence," the report says.

Recommendations:

a) That ASQA or an appropriate committee revisit the issue of volume of learning and ensure that the VET standards and regulations make these requirements mandatory and transparent, so that all RTOs must meet the same requirements around delivery to students.

- b) Where private providers are unable to demonstrate compliance with the most important standards around quality training and assessment, that they be de-registered and means applied to prevent them registering again under another name.
- vi) marketing and promotional techniques employed by private VET providers and education brokers both domestic and international

This submission has already highlighted concerns about the aggressive marketing techniques used by some private providers that needs to be prevented. The following is an example of this aggressive and inappropriate marketing. All governments make much of the fact that funding for genuine students is restricted and many are expected to pay high fees to gain the qualifications they need for employment. Yet the following case studies are still continuing:

Case Study

An older woman in her early 70s was at the Bankstown Central shopping centre having lunch with her bible group when they were approached by a young man asking them if they would like a free laptop and a "free" Diploma in Community Services. He assured them that though they had to sign up for a government loan they would never have repay it as they would need to earning over \$50,000 (and this was a group of pensioners) and they agreed they would never be earning that much. The whole group signed up and got their laptops. The older woman told another friend and brought her along to sign up. The College wanted to give her \$400 as a spotters fee but she refused as she already thought she got a very good deal. The woman did not wish to go to ASQA about this as at November 2014 she was still attending the course with her friends and added that there are many older Chinese people studying the course too with a "Chinese" speaking teacher.

The following are also examples of the type of marketing and promotion that is still taking place around Sydney. We also find it amazing that a number of TAFE teachers and Head Teachers have had to act as inspectors to try and protect students and community members from these unscrupulous operations:

Case Studies

a)

In April 2014 I had a disturbing experience at a community meeting with a local broker, who was aggressively targeting vulnerable people to sign up to Diplomas. The community group was offered a financial incentive for any enrolments that came through them.

From my profession experience I would have thought at best anyone of the group might be on a 3 year trajectory to a Diploma with the right preparation and support once they had been through the process to ensure they were on the correct pathway.

This company was giving them 3 weeks preparation then they would sign up, an incentive of a laptop for the duration of the course was offered, and it was indicated they could achieve a Diploma in Business or Community Services in about 6 months.

Working with students we recruit from such community groups, they extensively use the range of support services TAFE provides including disability support, counselling, Multicultural, Outreach, Aboriginal services, libraries, and vocational access for language and literacy support.

While TAFE fees are up front I was concerned at the repeated emphasis to them the course would cost nothing. At a later point it was mentioned when you earned more than \$50k you would pay some extra tax to cover costs. No mention of debt with VET FEE-HELP or what the qualification did cost.

In May 2014 the ... College was running information sessions at a Community hall in Tregear, Mt Druitt aggressively targeting the most disadvantaged in a very disadvantaged community. A community partner who attended the information session reported that the fact attendees were on pensions was a selling point, as "they would never earn enough to repay VET FEE HELP". They were discouraged from doing Cert II to Cert IV because they attract fees the students would not have been able to pay. They were pressured towards Diplomas and Advanced Diplomas with VET FEE- HELP. When they signed up they got a laptop, because the course is online, \$500 and another \$200 for anyone they get to sign up. If they do not withdraw in writing before census date and return the laptop and the cash

(impossible) they are locked into thousands of dollars of debt.

The day after this I had a call from a bloke from Tregear who was looking to pick up his laptop. He told me three weeks earlier someone knocked on his door telling him he could get \$500 and a laptop if he gave them his Tax file number, bank details and social security number and filled out some forms. He needed to do two courses, he thought one course was a white card and the other a business course. He was told this would help him start up his own company when he completed, he had no idea whether it was a certificate or a diploma. He had been told a few days earlier he had been approved and that he could come and pick up his laptop, he thought it might have been through TAFE hence the enquiry. He also told me the week before he was at the Mt Druitt pawn shop and someone brought in the laptop they had received from the college to get cash for it. The information session at Tregear Community hall that was proposed for the next day was cancelled; instead there was a notice up on the door. It seems the College had been scared off with threats of media presence.

c)

May 2014 - I deliver Cert I foundation engagement programs at a Learning Centre, which is part of the Mathew Talbot male homeless shelter in Woolloomooloo. I was alarmed to find the .. College had been enrolling people from the community in what they believed to be a 'Diploma in Business Management'. The students receive a laptop as soon as they enrol in the course do not have to pay anything for the course. Students have indicated there is an inducement to get others to sign up. When I asked one student whether there was a debt for the course he said 'no' and said he would finish the course in the next few weeks, I asked whether he had completed any assessments for the course he said that he had done a few things and his teacher had told him that he would complete the qualification. This student was having difficulty completing assessments for a Cert 1.

I made some enquiries directly to the college and found there is no 'Diploma in Business Management' and the students were enrolling in two qualifications; paying a double fee, however only receiving the delivery of 1 diploma with a couple a units tacked on at the end. Two students in the group who are enrolled in the course are completing Work Development Orders, indicating that they are already experiencing a debt burden on top of being homeless. They now have further debt with VET FEE HELP. On checking this College's website it appeared to deliberately targeting homeless people with an emphasis on free meals.

d)

I had a call from someone claiming to be Australia's leading training provider, enticing me to do a qualification. Out of interest I engaged in the conversation. I informed them I was a mature woman who have not studied since I left school 30 years ago. They were keen I do a diploma and had a range for me to choose from. The caller offered me the opportunity to speak to a counsellor. When I asked what qualification the counsellors had she replied, "they have no have qualifications, they just know about our courses."

In the worst cases of aggressive marketing, cash and other incentives are given and must be returned if the student withdraws. Often the people will have no means to repay the cash and may have pawned iPads or laptops. We are aware that the situation has become so bad in NSW, with so many complaints to the Department of Fair Trading, that they are launching their own advice in this area, entitled 'Know your rights before signing up for a training course'. According to the Department, there were so many complaints about unscrupulous marketing, such as iPad and laptop lures, in shopping centres, outside stations and outside Centrelink. People with a disability, young and old people who don't understand English, were all being signed up to courses way beyond their current capabilities. These practices have left students with large debts, with many not being aware of the consequences.

The operation of brokers in the Australian VET market is one of the areas where the Alliance has received the most complaints. The following example from the Australian in November 2014, outlines both the problems of accountability and also the amounts of money that brokers are soaking out of the system.

PRIVATE education company Acquire Learning is the latest in the fast-growing sector to be accused of inappropriate conduct, only a week after Vocation -Limited was forced to restructure its Victorian operations after it was found to be enrolling students in courses "inappropriate for their needs".

Acquire is believed to be preparing to list on the Australian Securities Exchange, with a float that could value the business at up to \$700 million.

The company, chaired by former AFL boss Andrew Demetriou, has been accused of cold calling and inappropriately enrolling jobseekers who had applied for positions advertised on Seek.

The Australian Skills Quality Authority, the sector regulator, yesterday said it would investigate the claims after receiving a number of complaints about Acquire's marketing practices recently.

Acquire itself is not a registered training organisation, but works as a broker allocating students to individual providers. Its website lists a number of registered training organisations that it has partnered with, including Avana, a subsidiary of Vocation.

ASQA said it had written to all RTOs that have a partnership with Acquire requiring them to provide advice about how they are meeting the required standards regarding ethical and accurate marketing.

Similar allegations were aired in *The Australian* yesterday in relation to false positions advertised by Empowered People Group, where students were asked to undertake training that was unnecessary for the positions they had applied for, and where the original advertised position did not exist.

An email sent by Empowered People to prospective jobseekers says Vocation would provide the training.

Acquire now stands accused of similar practices, where jobseekers applying for positions were later pressured into undertaking private tertiary study, in some cases becoming burdened by debts of up to \$8000.

Andrew Bassat, Seek's chief executive, said he had seen an increase in the education industry of some "very aggressive sales behaviour", and said the company took monitoring very seriously.

Acquire said it took compliance and ethical marketing practices very seriously, and the company's recruitment process was managed by an affiliated business.

"While we are aware of a small number of complaints on public forums such as Whirlpool, we are also committed to improving job outcomes for students," the company's general counsel Scott Buchanan said. "We ... welcome the opportunity to answer (ASQA) questions on this front"

Whilst ASQA and the Government refer to the new standards that will more strictly control marketing and advertising, including that RTOs cannot claim that students will get a job, the same regulations do not appear to apply to brokers. The growth in the number of brokers, some involved in what are unethical practices, including door-knocking in the western suburbs of Sydney to persuade residents to sign up to courses with the enticement of free iPads and the promise that there are no fees (due to being entitled to VET FEE-HELP). It is not good enough for private providers to claim that they did not know what was being claimed by the brokers they used.

The following case study was reported to the Alliance:

Case Study

A young person aged 17 years was persuaded by a person at a stall in the local shopping centre to study a Diploma in Business with ... College in Liverpool. This young person had completed Yr 10 and was convinced by the college that he should enrol in the Diploma of Business. He is struggling with the course and is very worried about his \$12,000 debt. He said there were three campuses of this college and there were a lot of students. The classroom experience comprised of students working through tasks with a number of "teachers" walking around the room helping people answer questions. He would like to get out of the course and have his fees refunded but doesn't know how.

Recommendation:

That ASQA apply strict regulations to brokers operating in the VET market, and that brokers be required to hold licences both issued and monitored by an appropriate agency.

Conclusion:

The TAFE Community Alliance reiterates part of the conclusion of its previous submission to the Senate Inquiry into TAFE.

In his address to the 2013 Australian Vocational Education and Training Research Association (AVETRA) Conference, Professor Stephen Billett questioned whether industry understood the business of education. The Alliance is concerned that educationalists who do understand the business of education are being excluded from significant discussions about VET and its future. As a group that represents community members and educationalists, we are in an important position to provide relevant advice. VET is not just about meeting the needs of industry, but also community and individuals.

Professor Billett went on to state that "a worthwhile national VET provision:

- focuses on securing students' vocations
- engages with and gives discretion to those participating and enacting it (eg. students and teachers)
- has curriculum models and processes accommodating local needs and requirements within a set of national goals, regulations and content
- elevates the standing of vocational education and the occupations it serves, and
- promotes the excellence individuals want, not just the competence somebody else prespecifies for them."

The TAFE Community Alliance asserts that the primary responsibility of government (state or federal) is to public education not public and private education. It is a government's responsibility to ensure that adequate funding is allocated so that there is a quality sustainable public vocational education and training system in this country. Governments have walked away from their prime responsibility to maintain a quality public VET system, and we believe this should be reversed.

The Alliance does not support public funding/government funding being used to either create or prop up a competitive training market. Private providers of VET operate and are motivated for profit, and consequently it is inappropriate for their business to be supported by government funding. If there is a market, then they must operate in such a way to make their business viable in the market, not by depending upon government funding which should be allocated only to the public provider, TAFE.

Many private providers do not have the current TAFE infrastructure to support people with special needs which contribute to education, employment, economic and social outcomes. Many do not have experts in careers counselling, disabilities, ATSI, multicultural education, LL & N, community development, people with multiple complex needs and youth at risk. They do not have experts in developing curriculum for the range of students within our community. TAFE does. To invest in TAFE with such services will lead to enhanced outcomes for society.

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