

Note: ACAL's response to the LLNP Discussion Paper questions should be considered as 'general' unless otherwise highlighted a relevant to learners from specific backgrounds: e.g. CALD and/or Remote learners.

Response:

1. What do you consider to be a reasonable period of time to rectify any performance issues before another provider on the panel is called on to commence LLNP service delivery?

Eight to ten weeks:

- Provided they are issues that are within the control of the provider.

2. What do you consider to be a reasonable timeframe to commence LLNP service delivery if you are called on from the panel?

Twelve to Fourteen Weeks

- Providers need reasonable time to undertake appropriate recruitment processes and orientation, including meeting mandatory RTO requirements.
- Providers may need to identify and secure a venue if they don't already have a facility in a particular location.

REMOTE: Providers in remote areas may need 14-16 weeks.

3. Do you consider the current LLNP qualification requirements to be too rigid? Why/why not?

Current qualifications of a three-year degree are not excessively rigid but they are unclear.

- Why are the requirements to assess higher than those required to teach? This makes recruitment more difficult and does not allow for early career teachers to assess.

Qualification requirements should not be relaxed but should be simplified. Teachers should have three-year degree.

REMOTE: If providers are experiencing difficulty in recruiting qualified staff they should provide scholarships to allow their teachers/assessors to upgrade their qualifications. The current qualification requirements are rigid; however they need to be to maintain the quality and consistency of delivery and to provide best value for money for DIISRTE.

In all instances where staff members are employed under a DIISRTE waiver with lesser qualifications, the RTO should be required to have a strategic plan for up-skilling these staff, which is audited for compliance.

4. If so, what do you think the LLNP qualification requirements should be?

Teaching qualifications should relate directly to the requirements of the accredited course taught. Adding or removing requirements as in the current LLNP causes confusion and complexity and limits the ability – especially of recent graduates - to gain employment in the program.

5. What impact do you think the removal of specific CT and AVOC will have on the outcomes to the program and quality of service delivery?

If the benefits of these options for Pre-vocational support, and/or work experience and smaller groups for disadvantaged learners can be replicated within an existing program, removal of these two programs should not impact significantly. For smaller class sizes, to cater for disadvantage, 'weighting', mentioned in other areas of this response, needs to be a factor.

It is possible that these benefits could be provided for as 'projects' within a current contract. That is, a provider might undertake to deliver one 'special project' per annum, or per contract (according to capacity and the size of the client pool). If the provider was not required to make a separate and lengthy application for approval and funds, this would be a sensible change.

6. Are there any other issues relating to CT and/or AVOC the Government should take into consideration?

If CT and/or AVOC continue, the only consideration for setting up a program should be the business case from the provider. The current system, under which a separate tender is required, made the option unattractive to providers. The need may have existed, but the current Guidelines made the process is too lengthy for providers to respond.

7. What would you consider to be a balanced approach to monitoring work experience placements?

A risk management approach could be taken. The contract could mandate establishing a formal LLNP work experience coordinator role, to be part of the contract. This would facilitate the best match of client to workplace and allow appropriate client support and monitoring/mentoring.

If LLNP providers could claim these work experience hours as part of the client's LLNP training it would contribute to their ability to fund a work experience coordinator position.

If gaining employment could be included as a KPI (as in earlier contracts), that would further enhance the role of work experience in the LLNP's suite of offerings to learners.

CALD: Spoken English language skills, are often difficult to attain for CALD learners and the ability to communicate in English is an important employability skill.

- Intensive 'readiness' activities, prior to work experience, including oral English development and team-work skills, would better prepare this cohort for work experience.
- If this approach were taken, and if relevant teaching plans could be considered, then a KPI would make work experience much more meaningful. (The current IV system means that providers often focus on written or numeric learners' texts, which can be copied and annotated, for verification purposes).

REMOTE: Work experience in most remote locations in Australia is not viable. There are very limited workplaces; therefore logistically not every candidate could be catered for and it could put some clients in inappropriate situations. Monitoring the quality of experience would be difficult and time consuming. The limited workplaces available limit clients' opportunities to explore sufficient options for employment.

8. What would be the impact of removing the requirement for departmental approval for work experience activities?

Inexperienced providers may select inappropriate work places and the quality of the work experience could be jeopardised.

The option to have IV providers review placements on the basis of linking work experience and learning outcomes could be fraught with difficulties. It is unclear how providers could expect to have any control over activities undertaken on the job that would ensure that the experience was linked to learning outcomes and KPIs. It would place an obstacle in the way of employers' willingness to take a client on work experience when there is already high demand from schools for these places in some areas. In addition there would be no incentive to employers to take on the burden of an extra responsibility such as matching work to learning outcomes.

The inclusion of the requirement for a dedicated Work Experience Placement Officer (mentioned in response to Q.7) may give sufficient rigour to the process.

9. What would assist you to make work experience placements a part of your Standard Training?

It would require the employment of specific staff to coordinate the work experience program and this would need to be considered as part of the overall budget. With low-level learners, such as CALD, long-term unemployed, or people from remote communities where work options are limited, 'work observation' would need to be an option, not just 'work experience' as Standard Training.

Employers might need an incentive to provide the places as supervision of work experience would be a distraction from their core business. Rather than the client being allocated menial chores, proper supervision could offer meaningful experiences as well as mentoring to clients.

10. Do you think that extending the period in which to complete a PTA will assist in retaining clients? Why/why not?

This may improve the number of referrals commencing training, so extending the time frame to assess may assist where course uptake is poor. However, if the PTA were to be conducted after training commenced it could be extremely difficult to then exclude a client. If after a PTA interview/assessment result deemed that the client was unsuitable for training. Therefore, PTAs should always be conducted prior to commencement to avoid potential conflicts as described. The simplest way to assist in retaining clients is to allow for the ACSF indicators to be changed, if and when a learner's skills have fully emerged, without needing to re-negotiate the learner's commitment to the training (the client has already signed up, is engaged and improving their skills – why change that status?).

REMOTE: It may benefit clients in remote communities to extend the period in which to undertake a PTA. Many factors can make access to communities difficult, or in some cases where communities close for cultural reasons it can be impossible.

11. What factors/ triggers are used to determine a job seeker's suitability for training?

Suitability should be determined on a case-by-case basis by an experienced interviewer/assessor. Barriers to successful participation in training could include:

- Lack of secure housing
- Health, mental health, substance abuse issues
- Inadequate nutrition and lack of food generally
- Impending legal issue/potential custodial sentence
- Involvement with sub cultures
- Cognitive disability.

Some of these factors may be negated to an extent by the level of support available to the individual.

CALD: Many learners from CALD groups present with very low skills – often NYA in all or most indicators. Perhaps these groups are not suitable for pre-vocational training, and the first 200 hours should focus on LLN,

only, not work experience, work observation, or employability. Subsequent courses could introduce these skills when initial LLN skills are in place.

12. What do you consider, in the event 200 hour blocks are to be removed, to be sufficient assessment points (for example, every 200 hours, 400 hours) for clients progressing in the program and why?

Assessment should consist of a combination of formative and summative assessments. Clients need the opportunity to demonstrate the mastery of the skill at the time they learn it, but then they should have an opportunity to demonstrate that the skill has been consolidated and can be transferred to other situations. Provided there was ongoing assessment, the formal assessment points could be at 200hrs and 400hrs.

13. How could the NBN be used to improve LLN delivery?

There may need to be a period of staff development in order to fully capitalise on the benefits.

If clients can demonstrate ability, and have access to technology, then perhaps some of the hours could be completed on-line. In this way, blended learning may become a possible option for some aspects of LLNP

The use of video conferencing and online resources will benefit clients in regional and remote areas, particularly during the northern region's wet season when many communities do not have road access. Classes could be conducted via Blackboard at these times.

REMOTE Communities would need to have IT infrastructure available for client use and support available to assist clients and trouble-shoot in case of technological problems.

14. What are the pros and cons to changing LLNP geographic boundaries to align with ESA boundaries?

Con - It may exclude and disadvantage some providers who have already established a presence in a location and have a well-developed relationship with stakeholders. They could be negatively affected if the changes to the ESA boundaries resulted in their inability to continue to service this area or required them to service a substantially larger area.

Pro - if it makes the work of referring, by the JSA's easier, then it's worth considering.

As with the question about panel delivery, earlier, perhaps the Government's approach should be flexible, according to geographic and population distribution across the country.

15. Where should site address details be recorded?

Intended site locations could continue to be recorded in the tender proposal and contract to identify geographic coverage. If not known at the time of tendering the specific site addresses could be provided to DIISRTE and uploaded into LLNP Online; or whatever system is in use prior to the first referrals being made to the provider. Failure to do this would not be in the provider's interest, as it would delay commencement of delivery, so they would be likely to comply.

16. What is an acceptable period of time for LLNP providers to forward address details?

Two weeks prior to their eligibility to receive the first referral.

17. Which of the KPIs would you change, why and how? KPI - PARTICIPATION: it would be more useful for participants and providers if the KPI included the proviso: "90% of offered places are filled by the provider. NB: if the client declines an offered place, this will not count in the 90%"

KPI - QUALITY: the definition of **valid** needs re-examination. Its technical meaning, in relation to Competency Based Assessment has not been spelled out in the guidelines; it is unlikely that all providers and the current IV have a shared understanding.

- At the moment, the KPI benchmark of 80% is at cross-purpose with 102 of the Guidelines, "The purpose of conducting independent verification activities is to assist TA Providers to develop and refine their training and assessment." The issue of which is more important, **developing and defining**, or **reaching above 80%** has become very unclear in this contract.
- The KPI would be more useful to providers, if the KPI read: "80% of the sampled PTA's are validated as accurate, either at first examination, or after corrective development and definition has taken place been the IV and the Provider."
- Conflating the Learning Outcomes, in the second section with the alignments in the third has created considerable, and chronic problems for providers. It has led to providers teaching 'to' the ACSF, which is **not** an accredited course.
- Providers would have a much simpler task – and could then concentrate on teaching and learning issues - if the two sections became one and read:

- “80% of sampled claims are aligned with the learning outcomes of the accredited units taught, The IV will align with the ACSF as per its documentation when the sample section is examined.”
- Both of these KPI’s currently have had accuracy issues which are **sometimes at variance between providers and IV ‘scores’**. A *clear, transparent and timely appeal process* for both would be better for providers and reduce time spent on administrative issues.

REMOTE: KPI PARTICIPATION & RETENTION In remote locations it would be very difficult to maintain a 90% uptake of places. It would be preferable to have a weighting applied for remote indigenous clients. Retention is likely to be much more difficult in regional/remote locations due to cultural factors and the nomadic tendencies of some groups.

18. What would be the impact on clients if, following a review of the KPIs, there was a decreased focus on the retention KPI? The retention of clients is rarely a matter that is under the control of the RTO, so the removal of this KPI would be unlikely to change the commitment of the RTO to its clients. However, disengaged groups can come with a suite of barriers that may take the focus off education and training and cause people to drop in and out of programs such as the LLNP (e.g. health issues, insecure housing/homelessness, financial concerns, legal issues, family and cultural commitments). Apart from advice to clients re the availability of support agencies available to assist, it is not the role of the provider to attempt to resolve these issues, so they are not in a position to address issues of attrition. If a provider were able to annotate the reasons for a learner’s decision to discontinue – related to their own issues, not the quality of provision - a weighting could be applied, by the government, to the provider’s retention rates.

19. What are the factors the Department should take into consideration as a performance measure? Issues outside of the control of the RTO – e.g. availability of accommodation, training rooms, weather/road conditions, cultural obligations of clients and cultural activities within the community that may impact on the RTO’s ability to deliver the training.

20. Do you think the introduction of incentive payments would assist with engagement and outcomes in the program? Incentive payments to clients may contribute to their engagement; however ongoing motivation and participation must be maintained to secure outcomes. Life issues common amongst lower SES groups may get in the way of their participation, even though the client may have been enthusiastic at the start of their LLNP training.

Incentive payments to the RTO based on engagement or retention would only frustrate RTOs, as they cannot control the external factors impacting on a vulnerable client group.

21. What do you think the impact of removing or revising milestone payments would be?

Retention and engagement are factors over which the provider has little control. Milestone payments are a deterrent to providers against servicing some of the most vulnerable and disadvantaged groups in society, as their circumstances create a risk to the RTO in terms of covering delivery costs because attendance may be poor.

A client’s personal circumstances, such as poor health, access to housing etc. are the main impediments to successful progression, rather than the quality of the program delivery. Teachers are dedicated professionals whose interest is in the wellbeing and learning environment of students. It is unlikely that payment incentives impact substantially on teaching performance. Other professionals (doctors, lawyers) receive payment for their services, whether they are successful in achieving optimum outcomes or not. Likewise, LLNP providers should be paid in full for the cost of delivering a program, even if clients do drop out or numbers are small.

Milestone payments also generate a formidable administrative load, as payments are calculated in very small blocks of delivery. Removal of milestone payments would be a positive action that would make tendering for the LLNP a more attractive option.

22. What would be the impact of moving to fixed pricing arrangement for mainstream and remote providers in the next contract?

If this term meant that the RTO would tender on the basis of a fixed price based on actual costs to deliver the program rather than having the funding tied to client attendance and participation, then the risks associated with being able to cover the cost of delivery would be greatly reduced. It would make the LLNP more attractive to potential tenderers, particularly in remote/regional communities where the continuity of client attendance is always going to be more problematic.

If it meant that the Government would fix the price it is likely to deter potential providers from tendering. It would limit/remove the ability to “meet the market” in terms of payment that could be offered to teachers. Providers need to have the ability to pay competitive rates to get the most appropriate staff to achieve the best outcomes for participants and the investment of taxpayer funds. Where providers own their own infrastructure, costs associated with venues are more predictable. Where these must be leased providers will need to be able to pay market rates. An externally fixed pricing does not take these factors into account.

REMOTE:

Costs associated with remote delivery can be very volatile. The pool of people who are willing to live and work in remote communities where there are fewer services, more difficult living conditions and a significantly higher cost of living is already limited. Competitive salaries are essential to attracting applicants. In many communities, lecturer accommodation and training venues are scarce, with competition fierce for what are very limited facilities offered at premium rates. Attendance is likely to be impacted by things going on in communities over which the RTO has no control; so linking payment to client attendance poses a substantial risk.

23. Do you think the current program name, the Language, Literacy and Numeracy Program impedes client engagement?

There may be some undesirable connotations associated with the word “literacy” in the minds of potential clients, so the proposed name change may have better “marketability”. The suggested name omits “Community” and it would be preferable so broaden the focus away from simply education and employment, to include the application of those skills in civic and personal life - Skills for Education, Employment and Community or SEEC – pronounced “seek”.

24. Do you think the introduction of Indigenous strategies or Action plans will assist LLNP providers increase engagement of Indigenous people in the program?

Engagement is a complicated matter in remote communities. The importance of gaining the support of “gatekeepers” in a participant’s community cannot be underestimated – i.e. these people must see the value of the training. Any proposed strategies or plans should not ignore findings emerging from studies relating to the way that mainstream literacy and numeracy is contextualised within Indigenous communities. Ethnographic research (Kral & Falk 2003) found “...that most training does not fit into the meaning and purpose of community life” and that to be successful educational programs must complement community objectives (rather than focus solely on work) and contribute to overall personal/family/community well-being”.

25. What aspect of the current LLNP model requires review to suit remote areas?

Remote areas need a “Remote Area” approach. One specific model might not suit all communities, so flexibility will be required. Site-specific models are likely to have a far better success. Time frames and milestone payments need to be adjusted significantly to take account of the realities of Indigenous community life.

Many communities or outstations would not have sufficient clients to support an ongoing LLNP, resulting in too few clients to make delivery viable unless all training was conducted in small groups. The lack of accommodation/training venues in remote areas and the demand on what is available suggests that periodic delivery (in blocks) might better suit communities, environmental conditions as well as maximise engagement and attendance.

26. Do you believe the community based model would improve remote client participation rates in other remote areas across Australia?

Community-based initiatives driven by Indigenous communities may increase interest and participation, but are likely to require assistance from external RTOs and other partners. The acquisition of LLN for adults requires a purpose, such as viable employment opportunities and with them the need for community members to speak, read and write English, which could provide momentum.

27. How do you see the LLNP working in the future with the new Remote Job and Communities Program

A single provider servicing a remote region should enhance their ability to foster and maintain links with partners who share common goals. Over time partners will develop a breadth of knowledge relating to the target audience in its specific context, rather than attempting to market a pre-defined concept to the Indigenous community, or worse still, be seen to be imposing it from outside. Realistic expectations with a focus on bringing about change rather than “operating a short term project or program” is likely to be more valued within the Indigenous community.

Partnerships with the other programs and providers already working with the group can:

- Facilitate the integration of literacy and numeracy with these other programs and services
- Allow the program to draw on a range of supports and inputs
- Better facilitate ongoing identification of needs
- Assist in maintaining participants’ interest in the training

28. Should the IV provider have both auditing and professional development roles? Why/why not?

If the IV provider has both roles it would facilitate the better targeting of professional development for LLNP staff. A dual role would allow verification issues to be addressed in professional development that are common across providers, thus improving performance.

29. What would be the benefits or disadvantages of splitting this role to two organisations?

One benefit could be less pressure on the one organisation. The disadvantages include professional development that is not in sync with issues being identified through verification processes.

30. What do you believe would reduce the administrative tasks associated with the IV process for LLNP providers?

Copying, collating and forwarding files can be an onerous process. If records could be scanned and stored so that the IV provider can retrieve those identified for verification it would reduce time, resources and postage.

31. Do you think the IV provider should be able to undertake observational reviews as part of an on-site visit?

If that means the IV provider sitting in on interviews/PTAs, it would most likely intimidate clients and go against best practice assessment principles. Assessment can cause people to feel anxiety and affect their output. In addition the conversation with the assessor at interview is where judgements are made about a person's capacity to fully engage in/benefit from training, depending on what they disclose to the assessor. Clients need to feel secure and that this conversation is confidential. This would not be the case if a third party were present undertaking observation. Recording the PTA would be a possibility, and would also help internal moderation; however clients would need to agree to it as part of the Privacy release.

32. Should the IV KPIs be reviewed? If yes, which ones and why?

The IV Performance standards focus on output and percentages of coverage (p. 106 of Guidelines). It would be much more useful for providers and learners, if the Verification role was to support the teaching and learning of the program, not just to check and make decisions about the QUALITY KPIs.

A prolonged visit, including speaking to teachers, learners and provider managers would provide an overview of 'how it works' for reach provider - this would be considerably more positive than the current process of providing paper-based evidence. Another useful service for the Verifiers would be to plan and deliver relevant Professional Development.

An appeals process is needed if the current system is to be retained; but ACAL strongly recommends a 'support' philosophy in the next contract.