VALBEC welcomes the opportunity to respond to the *Foundation Skills Workforce Development Project* consultation paper, and acknowledges the importance of discussion about professional standards. This is of vital interest to the LLN teachers we represent and we welcome further opportunities for consultation throughout this process. We also welcome the opportunity to discuss the way in which the terms Foundation Skills and LLN and professional and practitioner are used and defined.

As stated, VALBEC represents LLN teachers; this paper with its focus on a mooted Foundation Skills field has serious implications for them. On the one hand they recognise their work being described here, on the other their work is not just confined to VET and there is a concern it becomes invisible through this process; that this broad-based work will be subsumed into a discourse about VET. At present Foundation Skills seems to be an all-encompassing title that attempts to align teachers who work with the LLN/ ICT /Skill development of students with those who undertake largely VET training. These VET teachers may utilize the Foundation Skills Training Package or other programs to essentially enhance LLN aspects of VET. We believe these are not the same thing. The slow movement of the CGEA's format from curricula to training package, both in format and language over number of years has helped to blur the lines between what was LLN learning focused programs and the VET focused competency based achievements.

For our members it is vital for Foundation Skills to be clearly defined, they see a real danger of LLN being lost in Foundation Skills. We believe VET requirements are totally different from LLN requirements.

- Who is a foundations skills specialist?
- How can we be sure the broad scope of LLN work is not lost in this debate?
- How can we be sure this project does not trigger a narrowing of understanding about LLN work?
- Should there be a separate LLN recognition/registration board like VIT?

VALBEC naturally favours appropriate professional standards and is very keen to ensure they are not eroded. A professional standards framework would allow practitioners of LLN to have their work and their qualifications clearly defined and this would safeguard the integrity of the profession.

Other workers in the vocational training and adult education sectors may wish to work towards developing the specialised dispositions, knowledge and skill that LLN specialist teachers require to be effective teachers. It would be useful to look at ACTA's Standards for TESOL Practitioners which includes dispositions. This framework could easily be adapted for Adult Literacy, Adult Numeracy Teachers and also for teachers specializing in Digital Citizenship.

As the paper acknowledges, the debate about professional standards is also related to the debate about qualifications. VALBEC believes all practitioners delivering LLN need appropriate post graduate language, literacy or numeracy qualifications. As a part of this we believe a teaching practicum for LLN specialists should equal TESOL requirement. We continue to be concerned about LLN being taught by undergualified practitioners.

If we assume a Foundation Skills specialist's work will encompass LLN and employability skills then a postgraduate qualification in LLN with a practicum and a plan for continuous improvement with units in careers options and VET basics is necessary.

Where does this project sit in relation to ensuring qualifications are not eroded?

The paper delineates specialists from practitioners;

• Given that practitioners also need to have specialist expertise, how does the project account for this?

It is not clear that it is an unproblematic distinction, and while the paper acknowledges overlaps, we believe this distinction warrants further teasing out.

VALBEC does not believe the proposed role of associate is necessarily helpful. Again the term has not been defined or contextualized within the paper leading to us to question:

- What would be the sort of role the 'associate' may take up?
- What type of qualification would an 'associate "possess that would support Foundation Skills Delivery?

An ongoing concern in terms of capacity building, and therefore in building and maintaining professional standards has been the ongoing casualization of the workforce, bought about largely by competitive tendering and short term resourcing arrangements. Adequate funding for the profession is needed, that allows for continuous improvement and strong peak bodies. VALBEC believes peak bodies are an essential feature of a strong professional field, and their responsibilities could be strengthened further to allow for paid roles to meet the needs of the Foundation Skills / LLN practitioners. This would enable them to coordinate an approach to continuous improvement and up skilling of practitioners, provide subsidized training, scholarships, champion's networks etc.

 Where does this project sit in relation to a commitment to appropriate and continuing resourcing?

The paper poses a question about Continuing Professional Development, VALBEC affirms its agreement about its importance and asks; -

- How can a system wide, ongoing PD program, that has a focus on subject content and educational theory, and that allows for reflection and collegial support, be developed?
- How can such a system be sustainable in a competitive environment where staff has little job security and organization's little capacity for staff development?

In relation to what delineates foundations skills field is, conversations about boundaries are always fraught.

 Given the statement 'A foundation skills specialist could perhaps be considered an LLN specialist who also has knowledge and understanding of LLN in relation to employability skills and employment contexts', why is it assumed in this paper there is a need to delineate a foundation skills practitioner from an LLN teacher?

We believe it would be reasonable to say that all LLN practitioners have skills beyond their LLN expertise, be it in employability skills or working with the homeless, but that the LLN skills are at the heart of all this work. It is hard not to read this paper as assuming that in some way foundation skills is a special case, while at the same time being unable in the paper to locate the logic behind this position.

In relation to the final section of the paper 'Next steps' this work is contextualised in terms of unprecedented interest in raising skills, it is talked of here in terms of foundation skills but with the PIACC results imminent it is the LLN skills that will be foregrounded.

How can this 'unprecedented' interest be matched to resources commitment?

Interest is clearly important but a focus on needs, and early indications from the PIACC again highlight broad-based needs, inevitably leads to the question;

In what way is it useful to delineate foundation skills and LLN skills?

Our colleagues in WAALC, make two salient points:

"The most important distinctions are between the content specializations determined by the different needs of learners. TESOL, literacy and numeracy are very different fields; teachers need different skills and knowledge, but possibly similar dispositions, values and beliefs. Dealing with teaching and learning is the core activity. Dealing with the delivery context is secondary."

"There is a very grave danger that individuals with a bit of training/knowledge will believe they are the full bottle on the delivery of LLN without the underpinning knowledge of dispositions and understandings (as in the TESOL Standards.)"

While VALBEC is concerned about individuals without sufficient training, we believe more attention needs to be paid to structural issues that bring this about for example government policy and curriculum designers, and Registered training organizations.

Again, VALBEC values the opportunity to respond to this paper, believes it represents a significant opportunity to be involved with a vital debate, asks that this conversation is not rushed and reinforces our concern that there is a real danger that much of the work of LLN teachers can become invisible in the process of promoting a 'field' called Foundation Skills, and that there is a danger that students may miss out on the LLN support they need.