

NDIS Training and Skills Support Strategy
Advice Project

RTO Quality and Benchmarks Report

27 June 2019

Executive Summary

The WorkAbility Queensland *National Disability Insurance Scheme (NDIS) Training and Skills Support Strategy (NTSSS) Advice Project* is providing strategic advice to industry and governments on matters related to the NDIS workforce in Queensland.

This RTO Quality and Benchmarks Report outlines the findings of research and consultation that sought to identify robust industry benchmarks for Registered Training Organisations that might better support training and workforce development in the Queensland disability sector, and where other mechanisms might be needed to improve the quality of training delivery across the sector and assist in identifying high quality training providers.

The research and consultations identified that:

- more complaints have been made to the Queensland Training Ombudsman about RTOs delivering in the community services sector than any other of the 20 designated VET sectors in Queensland.
- many employers in the disability sector prefer to engage in non-accredited and in-house training due to 1. a lack of confidence in the quality of current accredited training options 2. a perception that accredited training does not necessarily provide the most contemporary skills and knowledge.
- when high quality training has been identified within the sector, the key features of the training were training was delivered:
 - by expert trainers
 - over an appropriate length of time
 - with a significant component of hands-on learning, including high quality work placement
- high quality work placements are a challenge for RTOs and students to find and for service providers to adequately supervise
- appropriately skilled and experienced trainers are also a challenge to find
- there is a lack of knowledge within RTOs, industry and potential students about what quality training looks like for the disability sector.

These findings have led to the following recommendations:

- **Recommendation 1** – Implement the additional PQS requirements for RTOs seeking to deliver disability-related qualifications and skill sets.
- **Recommendation 2** – Through the refresh process, ensure all RTOs with existing PQS status meet the additional PQS requirements.
- **Recommendation 3** - Investigate the feasibility of a paid placement system involving host providers and supervisors who have been screened and approved by a panel. Under such a system, supervisors could be required to have a supervision skill set or similar.
- **Recommendation 4** - DESBT to require RTOs seeking PQS status for disability-related qualifications and skill sets to provide evidence of the current industry skills of trainers and assessors.

- **Recommendation 5** - DESBT to work with WorkAbility Queensland, to deliver a training program in relation to the NDIS structure, principles, guidelines and quality and safeguards framework.
- **Recommendation 6** - DESBT to require RTOs seeking PQS status for disability related qualifications to submit evidence of course duration and modes of delivery that ensure sufficient time and opportunities for learning, reflection and practical application of learning (including materials used to gather evidence during work placements and for RPL processes).
- **Recommendation 7** - Monitor the outcomes of work on course duration by National Centre for Vocational Education Research (NCVER) and Australian Skills Quality Authority (ASQA) for potential measures to address this issue.
- **Recommendation 8** - DESBT to consider establishing additional scrutiny or evidence requirements for RTOs seeking PQS status for disability related qualifications regarding industry engagement that confirms the relevance and/or appropriateness of training and assessment strategies, including:
 - the qualification, course or skill set
 - chosen electives
 - delivery modes and training and assessment methods, practices and resources (including the length of training delivery)
 - the current industry skills of trainers and assessors.

About this report

This report forms part of the National Disability Insurance Scheme (NDIS) Training and Skills Support Strategy (NTSSS) Advice Project, which has been designed to provide strategic advice to industry and governments on matters related to the NDIS workforce in Queensland. The report has been developed for WorkAbility Qld by Sue Goodwin of Sodalite Projects and Rachel Healy of Rachel Healy Consulting.

This particular report is to enable WorkAbility Queensland to make recommendations to the Department of Employment Small Business and Training (DESBT) on robust industry benchmarks for the delivery of NDIS-related qualifications and skill sets. This may have implications for arrangements for Registered Training Organisations (RTOs) to obtain Pre-Qualified Supplier (PQS) status for the delivery of certain qualifications.

The findings presented in this report are based upon consultations with more than 280 representatives of the disability sector across the state. This included:

- Eight group discussions with members of disability service provider networks in Logan, Ipswich, Redland, Cairns, Brisbane, Sunshine Coast, Gold Coast/Tweed and Toowoomba (involving more than 180 people)
- Ten individual in-depth interviews with representatives of service provider organisations, including large, small, metropolitan and regional-based providers, and providers delivering services to children, self-managed NDIS participants and NDIS participants from culturally and linguistically diverse (CALD) communities and from Aboriginal and Torres Strait Islander communities
- 29 responses to an online survey, representing service provider organisations, self-managed NDIS participants, Disability Employment Service providers, advocates and training organisations
- Workshops with groups of service providers regarding workforce sustainability in Gympie and Brisbane (involving 25 people)
- Four in-depth interviews with RTOs that have Pre-Qualified Supplier (PQS) status and are delivering training to the disability sector
- Discussions with the NTSSS Industry Reference Group and the NTSSS RTO Reference Group, including validation of the research findings and recommendations (involving 35 representatives of disability service providers and RTOs).

Current quality arrangements

Queensland Pre-Qualified Supplier arrangements

RTOs wishing to access Queensland Government funding to deliver training and assessment services in any VET Investment Plan funded program or User Choice (Apprenticeship/Traineeship) funded program must obtain PQS status from DESBT. This requires meeting a range of requirements related to scope of registration, employer and industry support, financial viability and training history in order to be approved by DESBT.

In addition, DESBT is currently trialling an approach in which RTOs wishing to deliver the Certificate III in Individual Support and Certificate IV in Disability must also provide:

- a summary of their training and assessment strategy
- details of the proposed units of competency to be delivered, including elective units
- an example of a structured learning plan for vocational placement
- letters of support from employers confirming that they will host students on vocational placements
- contact details for employers who have had staff trained by the RTO, or who have employed students trained by the RTO
- contact details for employers who have provided vocational placements for the RTO's students.

National standards for RTOs

In addition, RTOs delivering any type of accredited training must meet the requirements of the VET Quality Framework, which is the basis upon which the Australian Skills Quality Authority (ASQA) regulates the VET system.

The Standards for Registered Training Organisations 2015, which form part of the VET Quality Framework, set the fundamental standards for training and assessment delivery in the sector. PQS status is also dependent on RTOs being compliant with the national standards.

Several of the standards are particularly relevant to issues of training and assessment quality that have been identified by the disability sector and are discussed later in the report. These are:

Clause 1.1

The RTO's training and assessment strategies and practices, including the amount of training they provide, are consistent with the requirements of training packages and VET accredited courses and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.

Clause 1.2

For the purposes of clause 1.1, the RTO determines the amount of training they provide to each learner with regard to:

- a) the existing skills, knowledge and the experience of the learner
- b) the mode of delivery
- c) where a full qualification is not being delivered, the number of units and/or modules being delivered as a proportion of the full qualification.

Clause 1.3

The RTO has, for all of its scope of registration, and consistent with its training and assessment strategies, sufficient:

- a) trainers and assessors to deliver the training and assessment
- b) educational and support services to meet the needs of the learner cohort/s undertaking the training and assessment

- c) learning resources to enable learners to meet the requirements for each unit of competency, and which are accessible to the learner regardless of location or mode of delivery
- d) facilities, whether physical or virtual, and equipment to accommodate and support the number of learners undertaking the training and assessment.

Clause 1.4

The RTO meets all requirements specified in the relevant training package or VET accredited course.

Clause 1.13

In addition to the requirements specified in clause 1.14 and clause 1.15, the RTO's training and assessment is delivered only by persons who have:

- a) vocational competencies at least to the level being delivered and assessed
- b) current industry skills directly relevant to the training and assessment being provided
- c) current knowledge and skills in vocational training and learning that informs their training and assessment.

Industry experts may also be involved in the assessment judgement, working alongside the trainer and/or assessor to conduct the assessment.

Clause 1.16

The RTO ensures that all trainers and assessors undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency-based training and assessment.¹

What the research and consultations told us about training quality

Whilst the national standards for RTOs and the requirements for providers seeking to obtain PQS status in Queensland provide a baseline for the delivery of quality training and assessment, the research and consultation findings point to some aspects of quality that need further attention if accredited training is to be considered of value by the disability sector.

The behaviour of RTOs in the Community Services sector is more of a problem than in any other VET sector

More complaints have been made to the Queensland Training Ombudsman about RTOs delivering in the community services sector than any other of the 20 designated VET sectors in Queensland. The community services sector, which includes the disability sector, accounted for almost a quarter (22%) of all complaints received by the Ombudsman between September 2015 and June 2018. By comparison, the other sectors

¹ Australian Skills Quality Authority, Users' Guide to the Standards for RTOs 2015

each accounted for less than 5% of complaints, aside from the business sector at 17%, the health sector at 10% and construction at 6%.²

The majority of the complaints regarding RTOs delivering community services related training have been under the classification of 'RTO behaviour', which generally relate to a gap between what was promised and what was delivered in terms of quality and accessibility of training and the level of assistance provided by the RTO. Of the 204 complaints relating to the community services sector, 47% were regarding 'RTO behaviour' and a further 38% regarding 'enrolments and refunds'.³

The complaints were made primarily by students themselves. However, a small proportion (13%) came from parents/guardians, employers and others.

Whilst the data is not available to identify how many of these complaints related specifically to the disability sector, the quality of RTOs delivering training in the community services sector is obviously an issue of concern.

There is a significant move towards in-house and non-accredited training

We identified in the network meeting discussions and interviews a distinct preference for in-house and non-accredited training for some aspects of workforce development.

Many service providers do require potential workers to have a Certificate III (most often in Individual Support or the previous Certificate III in Disability) as an entry requirement, or to work towards one once they are employed. However, there was often an accompanying view that this did not actually prepare them adequately for work in the sector. There were many reports of providers having to retrain workers once they were employed to fill skill gaps or address a lack of competency. This was done through in-house and non-accredited training.

Many others (including several large service providers) were not at all interested in their workers gaining formal qualifications and instead were developing and delivering their own in-house training programs.

"We went looking for training and weren't impressed – and are still not very impressed – with what is out there" (Disability Service Provider)

Whilst this issue is partly to do with what is currently on offer in terms of accredited training products (discussed in more detail in the separate *NTSSS Training Package Advice Report*), the quality of training delivery also plays a part.

Those service providers who appeared to be happy with the accredited training being delivered to their staff were ones that had well-established relationships with a particular RTO or trainer to ensure their workers would receive the training they needed. This often involved supplementing accredited training with non-accredited training.

Those consulted did not seem to place much faith in training delivered through pre-employment programs.

² Queensland Training Ombudsman, Presentation to Health and Community Services Workforce Council, August 2018

³ Queensland Training Ombudsman, Presentation to Health and Community Services Workforce Council, August 2018

"We are a small provider and look for people with a Cert III. It doesn't count for much... We interview people with the qualification and they don't know the answers to basic questions." (Disability Service Provider)

There are a number of characteristics that the disability sector considers as essential features of excellent training

The consultation questions focused not on what problems people had experienced in relation to training, but on the characteristics that are essential to excellent training.

This has provided useful insights into factors that might be addressed in order to ensure that training delivered to the disability sector is of high quality.

The consultation findings in many ways support previous research, which highlighted a preference in the sector for face to face training with time for space and reflection, the need for a range of different learning and delivery methods to cater to the diversity of the sector, and options for learning in which workers, people with disability and their families undertake training together.⁴ However, they have also provided a deeper understanding of perceptions of quality within the sector and how a number of features and characteristics of training contribute to these perceptions.

Expert trainers

The expertise of trainers was a recurring theme across interviews, discussions and survey responses. There is consensus that excellent training relies upon trainers that have significant expertise in their field, including recent, hands-on experience in the disability sector. More than half (54%) of the survey respondents rated knowledgeable and experienced trainers as *extremely important*, with a further 38% rating this characteristic as *very important*.

"It's not enough to just have trainers with the Certificate III and TAE. They need more hands-on experience." (Disability Service Provider)

"It's about the quality and currency of the industry experience they have" (RTO)

This characteristic equally applies to accredited and non-accredited training, with many of the service providers interviewed talking about the quality of non-accredited training they access in terms of the hands-on experience, values, knowledge of the sector, specific content expertise and innovative and interactive abilities of trainers.

"We search for people who have the right values and are good trainers, as well as people who have expertise in specialist areas such as autism and intellectual disabilities" (Disability Service Provider)

Many also reported that finding expert trainers with the right skills, experience and attributes is a significant challenge.

"They're a rare commodity" (RTO)

"If we could clone them, we would!" (RTO)

⁴ WorkAbility Queensland (2017) NDIS Training Requirements and Products: Report No 1

Clauses 1.13 and 1.16 of the Standards for RTOs 2015 require trainers and assessors delivering accredited qualifications and skill sets to have relevant vocational competency and current industry skills, which enables them to perform all of the tasks defined in the elements of units of competency and modules to an industry-standard level.⁵

However, several interviewees suggested that the knowledge and expertise of some trainers is not up-to-date, particularly in terms the changes that have occurred in the sector as a result of the introduction of the NDIS.

*"A trainer doing industry placement once every year or two does not make them current in this rapidly changing sector."
(Disability Service Provider)*

Feedback from service providers in the sector identified a lack of knowledge of the NDIS and the associated principles and requirements as a consistent issue across graduates of the Certificate III in Individual Support. Whilst this is partly a training product issue (which is discussed in more detail in the *NTSSS Training Products Advice Report*), it may also be an outcome of a lack of current knowledge amongst trainers.

Training is delivered over an appropriate length of time

Several interviewees raised the issue of training being delivered over an appropriate length of time. There was acknowledgment that learners need time to put their new knowledge and skills into practice and to take time to reflect on their experience in order to become appropriately skilled.

"Training needs to be spread out over time, not pushed through in two weeks. Students need time to put it into practice" (Disability Service Provider)

*"Workers need to have some experience to hang the learning on"
(Disability Service Provider)*

"Some RTOs churn them through in 5-6 weeks, which deflates confidence in VET" (RTO)

Several RTOs also reported that it can be a challenge to compete with the cheap RTOs who deliver quick, online-only courses, as delivering a quality program takes significant time and resources – and is consequently much more expensive to deliver.

There were also reports of Job Active providers referring job seekers to the short, online-only courses so that they could try to get a job more quickly. There was an acknowledgement amongst those consulted that it was understandable that job seekers would want to gain a qualification as quickly and cheaply as possible. However, this then shifts the burden onto service providers who then have to retrain workers to fill in all of the gaps and erodes faith in the quality of the VET system.

"I suggested to [one of my child's support workers] that she should go to TAFE to do her Certificate III, but she said, "Why would I do that when I can get through it quickly online?" Of course the quality of the training was terrible, but she's a good worker so I kept her on." (Parent of a self-managed NDIS participant)

⁵ Australian Skills Quality Authority, Users' Guide to the Standards for RTOs 2015: Chapter 4 – Training and Assessment. Available online at <https://www.asqa.gov.au/standards/chapter-4/clauses-1.13-1.16>

Currently, Clause 1.1 of the Standards for RTOs 2015 requires RTOs to ensure their training and assessment strategies allow for sufficient amounts of training through formal learning activities such as classes, lectures, tutorials, online or self-paced study, and workplace learning.⁶

Australian Qualification Framework (AQF) volume of learning guidelines stipulate that a student who does not hold any of the competencies identified in the relevant units of competency or modules would take 1-2 years or 1,200-2,400 hours of learning to develop the skills and knowledge required for a Certificate III level qualification. However, it is up to the RTO to determine an appropriate amount of learning according to the characteristics of the student cohort and in line with the principles of competency based training.

This creates significant challenges for the VET system in determining whether a training course is of sufficient length and for regulators to take action in cases where courses are “unduly short”.

Issues surrounding unduly short courses have been a focus of ASQA and the VET reform agenda over the past couple of years. ASQA’s report on the outcomes of *A review of issues relating to unduly short training* recommended a number of strategies for addressing these issues, including:

- Strengthening the Standards for Registered Training Organisations 2015 by defining the term ‘amount of training’ to include the supervised learning and assessment activities required for both training packages and VET accredited courses.
- Ensuring effective regulation of training by enabling Industry Reference Committees to respond to identified risk by including appropriate training delivery requirements, including the amount of training:
 - a) in the endorsed component of training packages (as mandatory) where they judge this is warranted, and/or
 - b) in the companion volume of the training packages (as recommended) where this is judged as a more proportionate response to the risk
- Enhancing transparency by requiring public disclosure of the amount of training in product disclosure statements, presented in a consistent way to enable comparisons across courses.⁷

Arising from these recommendations, the National Centre for Vocational Education Research (NCVER) is conducting research to determine the extent to which course duration is related to quality of outcomes and whether adding course duration specifications for training packages could improve the quality of outcomes from VET⁸. The Certificate III in Individual Support and Certificate IV in Disability are included in the

⁶ Australian Skills Quality Authority (2015) Fact Sheet: Determining the amount of training. Available online at https://www.asqa.gov.au/sites/default/files/FACT_SHEET_Amount_of_training.pdf?v=1508135481

⁷ Australian Skills Quality Authority (2017) A review of issues relating to unduly short training. Available online at https://www.asqa.gov.au/sites/g/files/net3521/f/strategic_review_report_2017_course_duration.pdf

⁸ See project details at <https://www.ncver.edu.au/research-and-statistics/research-projects/in-house-research/the-impact-of-course-duration-on-the-quality-of-outcomes-from-vet>

specific areas of focus of the research, the results of which are expected to be published in May 2019.

The consultations indicate that the 'amount of training' delivered by RTOs for disability-related qualifications is a significant issue in Queensland and the outcomes of this NCVET research may provide further insights into how it might be addressed.

Active engagement with students and service providers

A number of interviewees identified the level of engagement and interaction an RTO has with employers and students as an important indicator of the quality of training. One interviewee described this in terms of the RTO "*being actively involved with their students*", "*genuinely caring about them*" and being "*committed to outcomes for the student, not just the RTO*" (including the learning support needed to successfully complete the course). This level of engagement ensures RTOs get to know their students and understand what types of disability service providers they might be best suited to, which in turn helps with recruitment processes. Similarly, by building relationships with service providers, RTOs come to understand what is required for their students to become suitable workers.

Service providers who had this view not surprisingly felt that a greater emphasis on face-to-face learning than on online learning was essential.

Hands-on learning

Many service providers recognise the value of online learning for certain content areas (e.g. policies, legislation, Workplace Health and Safety), and as an affordable and flexible option for staff to work through courses over time. Some service providers are developing their own online learning modules covering specific topics considered core to their business, as well as other more specialised topics.

However, even in these cases, online learning is used to complement face-to-face and practical learning, not as a substitute.

Across the interviews and discussions there was frequent mention of the need for a reasonable component of "*face-to-face*", "*interactive*", "*practical*" and "*hands-on*" learning, including the use of real-life experiences and case studies. Purely online learning was not considered to build sufficient skills in the "*human elements*" of disability work or to gain an understanding of what disability work is really like. There were also several mentions of the value gained by students or groups of staff members coming together regularly for face-to-face learning, including greater depth of learning and discussion and extra motivation and support for students to complete their learning.

"Practical, hands-on training is the most relevant in the NDIS context"
(Disability Service Provider)

The survey feedback supports the need for hands-on learning, with almost 80% of respondents to that question rating hands-on/practical learning as *very* or *extremely important* as an indicator of excellent training delivery. However, not as many respondents felt that this needed to be done via face-to-face training delivery. Only 54% rated face-to-face learning as a *very* or *extremely important* indicator, while 78% rated the availability of online (remote) learning as *very* or *extremely important*.

The respondents rating online learning as an important part of the mix were predominantly from medium and large service providers in regional areas, suggesting

that this may be an important means of learning in areas where quality face-to-face options may not be available or easily accessible.

Work placements

The consensus around the need for hands-on learning highlights the importance of work placements as part of the learning mix.

Amongst survey respondents, 88% of respondents to the question on training delivery agreed that work placements, which are structured around specific learning activities and outcomes, were a *very* or *extremely important* part of excellent training.

The issue of quality and importance of work placements was also raised in several interviews. There were reports of potential workers who had completed a qualification without any experience in the sector – they had done their placement in an aged care facility.

"There are people coming through the Certificate III in Individual Support that have no experience at all in working with a person with disability" (Disability Service Provider)

Some suggested that sending students out on placement earlier in the course, rather than waiting until the end, was a useful way of checking that they are suited to the work and vice-versa. However, it appears to be more usual for placements to be done at the end of the course as a way of verifying competency.

Finding quality work placements can be a significant challenge for RTOs and there is often a high level of competition for places. Whilst many service providers find that hosting students on work placement is a good strategy for identifying potential new staff members, RTOs report that service providers are already stretched and struggle to find the time to supervise and mentor students in the workplace.

Customisation of training

There was an appreciation amongst some service providers of the value of a strong link with the workplace when delivering accredited training. This was described in terms of the use of real life examples from the service provider's business or clients as a basis for learning, providing choice in the electives delivered, delivering training in the workplace or training staff through traineeships in which there is a link between on and off-the-job learning.

"If you have a flexible RTO, they can use your own documents, real clients and real business situations as examples and training people in the culture of the organisation, not the culture of the RTO". (Disability Service Provider)

For 79% of respondents to the relevant survey question, having some choice in the content of the training program was seen as a *very* or *extremely important* indicator of excellent training delivery, with similar proportions rating customisation of the training to the particular organisation or work situation as equally important.

Service providers look to a range of mechanisms for identifying excellent training providers

When asked whether there was anything that would help them to determine whether a training provider was excellent, service providers spoke about:

- word of mouth

- feedback from students or workers who were undertaking or who had completed training
- seeing evidence in the level of quality of students or workers who had completed training
- reputation of trainers (e.g. some providers “follow” excellent trainers when they move to a new RTO).

Although not currently an option, there is also interest in the idea of a ‘quality tick’ by the disability industry that will give students and employers more information about the quality of training delivery. While a government ‘quality tick’ in the form of PQS status gives some guidance to service providers, survey results showed that this was not considered as important as a tick from the industry.

In some industry sectors, employers will look to recruit graduates who gained their qualification from certain RTOs as a way of ensuring quality training and skills. However, this does not seem to be as common in the disability sector. For those service providers looking for workers who already have a qualification, there appeared to be a level of resignation that the training would not have been of great quality.

By contrast, service providers who are paying for their workers to undertake training once they are employed appear to take a greater interest in the quality of the training provider, often forming partnerships with specific RTOs.

Whilst service providers have identified a number of ways in which they can identify the potential quality of training delivery, this is a much greater challenge for potential students – particularly for job seekers.

Current requirements under Clause 4.1 of the Standards for RTOs 2015, which relates to providing accurate and accessible information to prospective and current students, do not appear to be resulting in clear information about course delivery.

ASQA’s review of unduly short courses reported that “in many cases information was either absent, widely variable in relation to the same qualifications, or inconsistent in terms of the way it was presented. The inconsistency in this information makes it difficult for consumers to identify the provider and course that will meet their specific needs.”⁹

In addition, the number of complaints being received by the Queensland Training Ombudsman in relation to RTO behaviour in the community services highlights a mismatch between student expectations of training and what is delivered.

This suggests a need for ways to help potential students (and employers) to navigate the system and identify training providers that are going to meet their needs and provide a high-quality learning experience.

Whilst strengthening of PQS arrangements may help DESBT in ensuring training funds are given to RTOs that deliver quality training and assessment, it does not help potential students or employers to determine what they should look for in terms of quality and how to identify an RTO that delivers it.

There is a need for industry-developed mechanisms that can provide this advice.

⁹ As reported in the Users’ Guide to the Standards for RTOs 2015. Available online at <https://www.asqa.gov.au/standards/chapter-1>

One of the recommendations of ASQA's previous report on unduly short courses was to require public disclosure of the amount of training delivered by RTOs in a consistent way that enables comparisons.

An industry-based measure modelled on this recommendation may be to provide a central register of information of providers that have PQS status for disability-related qualifications that includes information about course length and delivery format.

The development of materials that describe what quality training looks like may also be of use.

The level of credibility placed by service providers on industry endorsement suggests that consideration might be given to some kind of mechanism for an 'industry tick' for training providers delivering training to the disability sector.

This would obviously require considerable work to establish. However, there are proven models like the Star Rating System established by the former Institute for Trade Skills Excellence, that could provide a basis for this.

Recommendations

These consultation and research findings point to a number of areas in which VET quality arrangements and industry initiatives might be used to improve and maintain the quality of accredited training delivery to the disability sector.

PQS arrangements

The current trial of additional PQS requirements for RTOs seeking to deliver disability-related qualifications and skill sets will help to identify whether this is an effective means of lifting the quality of delivery and providing industry with greater assurances of quality.

If this does prove to enhance quality, then those RTOs who already have PQS status should be required to meet the additional requirements as part of a refresh process.

There are several requirements that would be useful to add, strengthen or put under a higher level of scrutiny for those seeking PQS status. These are highlighted in further recommendations below.

Recommendation 1.

Implement the additional PQS requirements for RTOs seeking to deliver disability-related qualifications and skill sets.

Recommendation 2.

Through the refresh process, ensure all RTOs with existing PQS status meet the additional PQS requirements.

Support for work placements

Whilst the additional requirements for PQS providers may go some way towards ensuring the quality of work placements, it will not address the challenges faced by RTOs in securing quality placements for their students or by service providers in providing an adequate level of supervision and mentoring of the students they host.

There would be value in exploring the potential of models such as paid work placements (as is used in the teacher training system) and a shared industry panel of host providers and supervisors (administered by industry) that could be accessed by RTOs with PQS status. This could assist with finding more quality placements for students, and it may also help to alleviate the burden on supervisors (who are already struggling to meet the demands and financial constraints of the new NDIS) and support improvements to the level of supervision and feedback for students. It would be important to ensure supervisors are suitably skilled and supported to undertake this role.

The promotion to service providers of the value of work placements as a recruitment strategy could also assist in gaining greater support from industry.

Recommendation 3.

Investigate the feasibility of a paid placement system involving host providers and supervisors who have been screened and approved by a panel. Under such a system, supervisors could be required to have a supervision skill set or similar.

Trainer quality

With trainers playing such a key part in the quality of training delivery, providing evidence of an RTO's trainers' experience and current industry skills (i.e. how they meet Clause 1.13b of the Standards for RTOs 2015) may be a valuable and feasible addition to the additional PQS requirements.

For those trainers and assessors who do not have experience working in the NDIS environment, there would be considerable value in recommending they undertake upskilling in this area.

Understanding of the NDIS and the underpinning person-centred approach has also been identified as an upskilling need for existing workers in the disability sector, as well as a gap in the coverage of the current Certificate III in Individual Support (issues that are discussed in the *NTSSS Training Package Advice Report*).

With considerable demand for skills and knowledge in this area, there would be significant value in identifying possible non-accredited training options that can fill the gap until such time as accredited options are available. These might include:

- The e-learning modules provided by the NDIS Quality and Safeguards Commission (which will become a requirement for all employees of registered NDIS providers in Queensland once the NDIS Commission commences operations in the state in July 2019)
- The Disability Induction eLearning Program developed by National Disability Services
- Other specific training developed and delivered by the disability industry (e.g. through WorkAbility)
- Non-accredited training developed and delivered by the VET system (e.g. TAFE Queensland). This could possibly be an expansion of the current unit of competency CHCDIS007 - Facilitate the empowerment of people with disability.

Recommendation 4.

DESBT to require RTOs seeking PQS status for disability-related qualifications and skill sets to provide evidence of the current industry skills of trainers and assessors.

Recommendation 5.

DESBT to work with WorkAbility Queensland, to deliver a training program in relation to the NDIS structure, principles, guidelines and quality and safeguards framework.

Length of training programs and modes of delivery

When examining the learning and assessment strategies submitted by RTOs seeking PQS status for the Certificate III in Individual Support, there would be value in additional scrutiny of the length of time over which training and assessment programs are being delivered and the modes of delivery – including processes for the delivery of RPL.

This may require RTOs to provide evidence of where and how hands-on application of learning is taking place over an appropriate length of time, as well as the details of the requirements for learners to demonstrate their competence (e.g. copies of learning plans plus log books/on-the-job skills booklets/placement booklets that show learning over time, learning in a disability sector environment and hands-on practical demonstration requirements (i.e. what needs to be demonstrated and how many times and in what environment)).

The findings of current research being conducted by NCVET on *the impact of course duration on the quality of outcomes from VET*, which is due for publication in May 2019, may provide some ideas for further scrutiny of length of program delivery, as may further advice from ASQA in response to a request from the COAG Industry and Skills Council¹⁰.

Recommendation 6.

DESBT to require RTOs seeking PQS status for disability related qualifications to submit evidence of course duration and modes of delivery that ensure sufficient time and opportunities for learning, reflection and practical application of learning (including materials used to gather evidence during work placements and for RPL processes).

Recommendation 7.

Monitor the outcomes of work on course duration by NCVET and ASQA for potential measures to address this issue.

Industry engagement

To further ensure that training delivery is meeting industry needs, it would be valuable to require RTOs seeking PQS status to provide evidence of industry engagement that confirms the relevance and/or appropriateness of:

¹⁰ As per the communique of the meeting held on 3 October 2018. Available online at <https://docs.education.gov.au/node/51461>

- the qualification, course or skill set
- chosen electives
- delivery modes and training and assessment methods, practices and resources (including the length of training delivery)
- the current industry skills of trainers and assessors.

This is in line with the current requirements of Clause 1.5 and 1.6 of the Standards for RTOs 2015.

At the same time, the training sector needs to be provided with guidance on what the disability industry considers to be high quality training and encouraged and supported through initiatives such as WorkAbility Queensland to develop innovative training solutions that meet industry's expectations.

Recommendation 8.

DESBT to consider establishing additional scrutiny or evidence requirements for RTOs seeking PQS status for disability related qualifications regarding industry engagement that confirms the relevance and/or appropriateness of training and assessment strategies, including:

- the qualification, course or skill set
- chosen electives
- delivery modes and training and assessment methods, practices and resources (including the length of training delivery)
- the current industry skills of trainers and assessors.