

31 January 2019

VET
Department of Prime Minister and Cabinet

Via email: VETreview@pmc.gov.au

Dear Sir/Madam

COMMENTS ON VOCATIONAL EDUCATION AND TRAINING (VET)

The Construction Material Processors Association (CMPA) is dedicated to the representation and service of its Members in the Victorian Earth Resources industry. The CMPA represents a broad spectrum of businesses that extract and process hard rock, gravel, sand, clay, lime, and soil. CMPA members also operate recycling businesses.

CMPA members are typically small to medium sized family and private businesses, local government and utilities. Many are regionally based employers and service local construction, infrastructure and road maintenance needs. The extractives sector is a key pillar within the construction industry underpinning the growth and economic development of Victoria through supply of the construction materials.

In 2017/18, the sector supplied 58 million tonnes of construction materials to the market, at a value of approximately \$948 million. Small to medium quarries account for approximately half of this production.

The CMPA supports the principle of responsible, balanced legislation that is in the best interests of the State of Victoria. CMPA also supports VET through participation in the Extractive IRC.

The following comments are made:

National Training Frameworks comments/understandings:-

- individual industry frameworks are reviewed and totally restructured too often (perhaps every 6 years or so), which makes it difficult to understand the current framework at any time,
- RTO's must be accredited/registered to deliver within specific industry frameworks and to deliver specific units,
- individual industry frameworks have many units which are never utilised, partially due to the lack of RTO's holding appropriate unit accreditation,
- individual RTO's usually only offer a limited array of units, due to the effort in obtaining accreditation for specific units,
- only a limited number of units can be sourced from other industry frameworks,

Frameworks could possibly benefit by:-

- an increase in the number of units allowed to be sourced from alternative industry frameworks,
- an increase in the number of RTO's accredited to deliver units within a framework,
- being able to facilitate completion of qualifications by utilising multiple RTO's to deliver different components of a qualification,
- reducing the effort RTO's need to undertake to gain accreditation to delivery specific units, enabling students access to a broader array of units within a framework,

(RTO's tend to only offer/deliver across units they hold accreditation, which has the potential to limit access to the broader array of units within a specific industry framework),

- an ability to customise a hybrid course which best aligns with an organisation's or student's needs (including increasing the number of units which can be sourced from different industry frameworks),
- perhaps having different RTO pre-qualifications for Cert II and Cert III, compared to Cert IV and Diploma, may increase the number of RTO's,
- increasing the competency standards for a Diploma,
- regional organisations incur considerably high costs for employees to participate in National Framework training and assessment, which is usually delivered by capital city based organisation,
- regional organisations could benefit from additional funding,

Surface Extraction Framework:-

- it's difficult to facilitate the formal issuing of Cert II and Cert III, in part because various RTO providers may have been engaged to deliver training and assessment for individual units,
- there is a lack of RTO's offering to deliver full Cert II and Cert III packages, perhaps a regional issue ?
- there is a limited number of RTO's offering delivery of Cert IV and Diploma,
- the Surface Extraction framework could benefit by allowing an increase in the number of units which could be sourced from other industry frameworks, for example the Laboratory Testing framework,
- RTO's delivering Cert IV and Diploma typically offer a limited (fixed) array of units, making it difficult to customise the training to gain maximum benefit to an organisation/employee,
- Cert IV and Diploma RTO programs could benefit from the delivery of units related to product knowledge, product quality control, laboratory testing, etc

I would be happy to discuss our submission further at your invitation.

Yours sincerely

EMGibson

Dr Elizabeth Gibson
General Manager