



**Australian
Nursing &
Midwifery
Federation**

VICTORIAN BRANCH

535 Elizabeth Street
Melbourne Victoria 3000

Box 12600
A'Beckett Street PO
Melbourne Victoria 8006

anmfvic.asn.au

t 03 9275 9333

f 03 9275 9344

e records@anmfvic.asn.au

ABN 80 571 091 192

RTOID: 22609

**ANMF (Vic Branch)
Submission to
Legislation for a
strong and
effective Victorian
TAFE network
Consultation paper
– Industry Advisory
Groups February
2022**

Lisa Fitzpatrick, Secretary
ANMF Victorian Branch

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ANMF was established in 1924. The ANMF is the largest industrial and professional organisation in Australia for nurses and midwives, with Branches in each state and territory of Australia, we represent the professional, industrial and political interests of more than 310,000 nurses, midwives and carers nationally. The ANMF (Victorian Branch) represents more than 95,000 nurses, midwives and personal care workers (the latter predominantly in the private residential aged care sector).

The core business for the ANMF (Victorian Branch) is the representation of the professional and industrial interests of our members and the professions of nursing and midwifery. We have aligned interests in workforce health and safety and the creation and teaching of continuous professional development for Victorian nurses and midwives. Our members are employed in a wide range of enterprises in metropolitan, rural and community care locations and across the public and private health and aged care sectors. Our members make up a workforce that contributes to Victoria's economy both directly and indirectly.

The ANMF (Victorian Branch) is a stakeholder in the health and community sectors in Victoria. Through our work with members, we aim to strengthen the contribution of nursing and midwifery and to improve Australia's health and aged care systems, and the health of our state and national communities. We participate in the development of policy relating to nursing and midwifery practice, professionalism, regulation, education, training, workforce, and socio-economic welfare, health and aged care, community services, veterans' affairs, occupational health and safety, industrial relations, social justice, human rights, immigration, foreign affairs and law reform.

The Australian Nursing and Midwifery Federation (ANMF) (Victorian Branch) values the opportunity to comment on ***Legislation for a strong and effective Victorian TAFE network Consultation paper – Industry Advisory Groups February 2022*** as the ANMF (Victorian Branch) is represented on the Victorian Skills Authority (VSA) Board and is a member of the VSA Industry Advisory Group (IAG). We are aware of the range of issues raised within the Consultation Paper, that indirectly and directly have the potential to impact on the current and future nursing workforce. Moreover, the ANMF (Victorian Branch) also represents the professional interests of our members that are involved in the teaching qualifications within the Victorian TAFE's sector. We have registered nurse and/or midwife members that teach into courses and qualifications that support nurses into their work, like Certificate III, IV, Diploma and Advanced Diploma qualifications and associated add on, Skill Sets that are embedded in the vocational education and Training (VET) sectors.

We note the proposed legislation outlined in the Consultation Paper aims to contemporise and realign the Victorian Education and Training Reform Act (2006) Vic (ETRA) Act, to better enhance Victoria's TAFE education system and to ensure that it is meeting the future needs of both industry and government, and supports individual students, in their acquisition of skills for employment.

The ANMF considers nurses and midwives in Australia, are educationally prepared for safe and competent practise, at the successful completion of their education, because all nursing and midwifery education in Australia must meet the strict compliance requirements set out by the Nursing and Midwifery Accreditation Council (ANMAC), before a nurse or midwife graduates. Where a graduate has demonstrated that they meet the registration standards set by ANMAC they are eligible to make an application to the Nursing and Midwifery Board of Australia (NMBA), for registration to practice.

Additionally, we recognise the contribution that Victorian TAFE makes in to maintain a flow of graduates into the health and community services sectors. Victorian TAFE undoubtedly strengthens Victoria's education and training systems, particularly where there are benefits for increasing student completion rates and set a benchmark for improving greater collaboration between the vocational education and training (VET) and Higher Education sectors to be forged.

In principle ANMF (Victorian Branch) supports the proposed ETRA reform. We want to ensure the Victorian TAFE system, comprising twelve (12) standalone TAFE institutes and four (4) dual sector universities, continues to educationally prepare high quality graduates, to support the VET system in Victoria, as well as engage in industry/stakeholder collaboration about course content, and importantly is:

- able to create and strengthen articulation pathways for students;
- is seen as an enabler for high quality student clinical placements, and
- fosters and promotes lifelong learning through skills/qualification escalation and post graduate studies.

The ANMF (Victorian Branch) will concentrate our commentary to the questions asked in the consultation paper – Industry Advisory Groups.

We acknowledge that Victoria's TAFE network has undergone significant transformation over the past decade, and that the Education and Training Reform Act (2006) Vic (ETRA), the legislation which establishes the objectives and oversight of Victoria's TAFEs has not kept pace those changes.

Victorian Skills Authority - Industry Advisory Group Consultation Paper Questions

What do you see as the most significant impact that Victoria's public TAFE network makes?

ANMF understands it is the intent of the Victoria's public TAFE network to bring together all twelve (12) TAFE institutes and four dual sector universities to better advocate for the value of Victorian TAFE, in its delivery of quality training and both state and commonwealth government policy, partnerships and developments, that bring a balance to Victorian TAFEs and the national government TAFE agenda.

One of the significant impacts of the Victorian TAFE Network is that it has wide state-based reach, with over 90 TAFE campuses across the twelve standalone TAFEs and in partnership with the four dual higher education providers (universities with TAFE arms). This fact is undoubtedly a strength of the system.

The Victorian TAFE sector has demonstrated that it is an enabler for student participation in the VET sector, which provides, connection and engagement with industry and state government policies and processes. The sector delivers skills acquisition for students to transition to workers in a range of

sectors for Victoria's growth economy, as outlined in the Macklin Report in 2020¹ to maintain a steady follow of graduates.

Specifically, within the Victorian nursing and aged care workforce, the free TAFE courses have proven to be on the list of high demand qualifications, with very high participation and completion rates. Moreover, the Diploma of Nursing qualification, since it was included in the 'free' TAFE offerings in 2019 has resulted in significant graduates that have been eligible to apply to the Nursing and Midwifery Board of Australia to register as an enrolled nurse. Additionally, diploma of nursing skills acquisition from Victorian TAFE has also led to graduates being eligible to enrol in Bachelor of Nursing programs, who may not have otherwise achieved the bachelor course entry requirements. Moreover, the dual sector education providers, in many instances can fast track diploma of nursing graduates through their bachelor programs faster, as a result of completing TAFE studies and credit transfer of their knowledge.

What is the most important aspect of TAFE delivery for your organisation?

The ANMF (Victorian Branch) considers many aspects of Victoria's TAFE education programs and course delivery to be beneficial to:

- Overall student pedagogy,
- Individual learners
- industry outcomes,
- professional aspirations,
- profession (nursing) workforce growth,
- skills development, and
- skill escalation
- articulation with further nursing studies, higher qualifications and
- contribute to life - long learning

The above listed benefits are at the forefront of TAFE's importance. Moreover, the fact the TAFE system in Victoria is structured in a way that:

- Generally does not exploit students with unrealistic fees and charges, though it is of concern that students who do not qualify for the 'free TAFE' Diploma of Nursing are being charged fees in the vicinity of \$27,000 for the course.

¹ Macklin, J. 2020. **Future Skills for Victoria:** Driving collaboration and innovation in post-secondary education and training. Final Report of the Skills for Victoria's Growing Economy Review. Available at: <https://www.education.vic.gov.au/about/department/Pages/macklin-review.aspx>

- Additionally, some private registered training organisations (RTOs) also price their product delivery with exorbitant fee structures, with exactly the same skill acquisition/outcome for nationally accredited training products, that are provided by Victorian TAFE at a more realistic and affordable price and allow students access to VET Student Loans² to help students to cover tuition fees for vocational education and training (VET) courses if they are studying an approved courses at the diploma level and above.

TAFE provides pathways to degree qualifications at TAFE and/or their dual sector or standalone university partners. For example, TAFE delivery of the diploma of nursing program HLT54115 and its successor qualifications has proven to have delivered a 'pipeline' flow of graduates that are ready to commence their careers as enrolled nurses in state hospitals, health services and resident and community aged care services. Alternatively, graduates can go onto study a Bachelor of nursing degree through the higher education sector.

All Victorian dual sector TAFE/Universities have established pathways programs that enable diploma of nursing graduates to access higher and further vocational education because of their TAFE qualifications. Additionally, graduates of Individual Support Work qualification - CHC33015 or its successor qualification, graduate from TAFE programs with the pre-requisite skill acquisition that enables them to make application for work as personal care workers, in both residential and community aged care settings, as well as disability services. Additionally, the qualification can be used as a skills escalator to diploma qualifications, within the Victorian TAFE system.

Since the Individual Support Work course was included in the Victorian free TAFE offering, it has been demonstrated to be very popular in enrolments and has become the pre-requisite for graduates to consider enrolment in diploma of nursing courses at TAFE.

What are your organisation's aspirations for the Victorian TAFE network in the future?

ANMF (Victorian Branch) is a strong advocate for Victorian TAFE remain in public hands, and that it is available to vocational pathway for learners for access to jobs and careers. Similarly, the Victorian TAFE system must continue to be a provider of skills acquisition and escalation, opening skills development opportunities for both school leavers and adult learners.

Our TAFE system is the critical element between Victorian school leavers, and adult learners having ready access to price competitive and selected free education and training, that may otherwise be out of reach to them, as currently Victorian TAFE offer two years of free access for students to access high demand training products, for learners that might have otherwise missed out on a training place.

ANMF (Victorian Branch) is supportive of continued state and federal government initiatives that provides access and equity for women, the unemployed, culturally and/or linguistically diverse people, the disabled to engage in TAFE education.

² VET Student Loans Information. Available at: <https://www.studyassist.gov.au/vet-students/vet-student-loans>

We are very supportive of regional and rural TAFEs being able to continue to establish industry partnerships and continue to educate and train locally, to keep their communities engaged, at the local level, and provide meaningful work opportunities in both local communities in the regions and across Victorian and with national reach.

Does this capture the essential role of Victoria’s public TAFE network and its point of difference?

The ANNF (Victorian Branch) considers that the information in the Consultation Paper captures the essence of the points of difference within the Victorian Public TAFE network, and the essential role Victorian TAFE provides.

The contrast is stark when compared to other Australian jurisdiction TAFE systems and structure and that of private, for-profit VET education providers referred to as registration training organisations.

Are there any key principles or objectives that are missing, or could be?

The major principles appear to be covered in the consultation paper.

Nevertheless, the ETRA should aim to strengthen and emphasise the facts that showcase Victorian TAFE an enabler for skill acquisition and/or escalation, and as the launching pad to the higher education sector for student engagement for participants that may otherwise experience disadvantaged to enter the higher education sector, (equity/equality); and that TAFE also can be an enabler for students to meet entrance requirement to academic qualification acquisition, that may otherwise not have been available to some individuals, especially those with numeracy and/or literacy challenges.

Do you think these changes will bring about the desired outcomes?

Yes, provided that there is a whole of system approach and all Victorian 16 TAFE providers are enabled to provide education and training on a level playing field, the desired changes to the ETRA have to be crafted with the utmost care to ensure that government, industry, TAFEs and students can all achieve the desired outcome/s.

How might a network model better support improved students and industry outcomes?

A whole of Victorian TAFE network model could mean that students has improved access to courses that are high demand programs across a region, either metropolitan or regional as TAFEs could be positioned to share services, infrastructure, human resources (teachers).

Such an approach could result in TAFEs not having to be in position to ‘cherry pick’ the most profitable courses to put on their scope. Moreover, a network approach could mean that individual TAFEs could be able to place high emphasis on supporting network TAFEs with share in access to any state of the art, modern infrastructure that has been established to model education and training facilities that replicate real industry conditions and workplace settings, with access to high tech equipment for student learning at strategically selected Victorian TAFE sites, (for example areas of high need and/or where there are ‘thin’ markets) meaning the not every TAFE has to penny pinch to afford the best resources at each TAFE. Such an approach can share finite resources across the entire Victorian TAFE network, so they can be constantly and consistently utilised and not left idle for prolonged periods throughout an academic teaching phase.

A system where regional and metropolitan TAFEs work with local communities to forge solid engagement strategies with potential employers and other key stakeholders, like unions, Victorian TAFE can produce graduates, that are work ready, by partnering in local engagement and relationship building. Training products can then be developed and delivered to best serve, and prioritise areas of demand, needed in Victorian communities, using a tripartite approach consisting of:

1. The TAFE
2. Industry – (employer) and
3. The student.

In addition, the ANMF (Victorian Branch) acknowledges the Andrews Government TAFE Teacher Training Scholarship³ launched in 2021, with 125 skilled workers taking up the scholarships to the value of \$10,000 each, to March 2022, within a range of high demand sectors/industries, including health and community services, construction and electrotechnology.

Nevertheless, we welcome the interest from registered nurses to access the scholarships to embark on a path to teach future nurses, with approximately 15 per cent⁴ of the 125 scholarships going to registered nurses to acquire the teaching knowledge. The additional qualification in turn enables more registered nurses to support diploma of nursing students to achieve a nationally recognised nursing qualification. We note the limitations of the TAFE Teacher scholarship being capped at a total of 200. This initiative is a wonderful start, and ideally should be extended to capture the interest of more participants over the next 4 years to meet the anticipated demand associated with skills reform and the Victorian Skills Authority – Skills Plan.

What factors would support success or mitigate risks of the network approach?

Understanding the education and training needs in a specific locality that aligns with government training policy and both state and national targets though a local skills analysis is a key factor for the

³ Victorian Government. To Become a TAFE Teacher. Available at: <https://www.vic.gov.au/tafeteacher>

⁴ Premier of Victoria. 2022 Media Release: Industry Experts Signing Up As Victorian TAFE Teachers (March 9, 2022) Available at: <https://www.premier.vic.gov.au/industry-experts-signing-victorian-tafe-teachers>

success of the network approach to Victorian skills delivery may mitigate potential risks associated with the network approach.

It is critical that government and policy makers understand what the capability of the TAFE sector is, before applying policy directives.

Knowing and understanding exactly what education/training is needed by employers of TAFE graduates, though a codesigned course development/planning/delivery methodology becomes fundamental.

One of the pitfalls of Victorian free TAFE for the diploma of nursing program has been that some education providers were not organisationally prepared for clinical components of student education when they accepted course participants, required to have to undergo workplace clinical placements within the diploma nursing course. Clinical placements take place in hospitals, primary/community care services and aged care settings. The result has been that some students have had their course completion extended, because the education providers' could not achieve the mandated clinical experiences for the students in a timely manner. These issues can result in a backlog in the 'pipeline' of supply and hold ups for future student intakes, to match the course demand.

It is also important to ensure that within the network approach:

- there are mechanisms for both employer/industry and stakeholder consultation develop education and training that addresses the whole of network need.
- that high cost, low volume offerings are not offered in all TAFEs in the network to ensure that each TAFE in the network is not catering to 'thin' markets.
- that course planning and evaluation that supports best practice outcomes within the networks, to ensure industry needs are being met.

Do you think these changes will bring about the desired outcomes?

For the network changes to have the desired outcome, it is critical that they are supported at the state level through sound political policy and funded accordingly, in order for the changes to be sustainable beyond a government cycle. It follows that any changes will require high level engagement and support from the Skills Minister in conjunction with the Department of Education and Training, and designated support staff to coordinate service delivery across the networks and the dual sector education providers.

Does the proposed role of TAFE as public provider respond to industry and employer needs?

Yes, the proposed role of TAFE as a public provider works to respond to industry and employer needs. This becomes evident when contrasted to other jurisdictions. Victoria is really the only State that retains a diverse system of TAFE Institutes comprised of 12 TAFE Institutes and 4 dual sector universities. Looking at Tasmania, the Northern Territory, and the ACT which effectively had one TAFE system over the last decade. Similarly, South Australia established a one TAFE, one RTO model back in

2012, followed by Queensland TAFE being established in 2013, managed centrally under one management. Western Australia centralised their model into the WA government run TAFE merging 11 providers into 5 TAFE institutes. Since 2015 TAFE NSW as functioned as one entity⁵.

What should be the contribution of industry and employers be in supporting TAFE delivery of modern, relevant, and high-quality skills and training?

Industry, employers, state and federal government, along with unions and employer associations all form key stakeholder groups that contribute to, and have vested interest in, the development and viability of Victorian TAFE. Such stakeholder partnerships foster public confidence in the VET education and training system and contribute to industry and employers coming together to support and validate TAFE training product delivery, within a modern, relevant and high-quality Victorian skills and training system.

The contribution of these stakeholder must occur at the planning and implementation phases of course conception, with involvement extending to evaluation and validation course outcomes, including completion rate, graduate job creations and opportunities that result in real, skills based full employment and not to the ad-hoc dead ends jobs of the gig economy.

⁵ Shubert, R., Goedegebuure, L. 2017. Strengths and Benefits of the Victorian TAFE Model. Victorian TAFE Association Report.