

Ethnic Communities' Council of Victoria

# Skills for Victoria's Growing Economy

ECCV Submission

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- Bendigo TAFE Skills & Jobs Centre
- Box Hill Institute and Centre for Adult Education
- Gippsland Multicultural Services
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- Nhill Learning Centre
- Sunraysia Mallee Ethnic Communities' Council
- Victorian Cooperative on Children's Services for Ethnic Groups (VICSEG)
- Wimmera Development Association
- Wyndham Community & Education Centre

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# Table of Contents

Acknowledgements.....	1
About ECCV .....	3
Summary of Recommendations.....	4
Background and Context.....	5
Key Themes .....	6
Barriers to Access.....	6
Literacy and Numeracy .....	6
Pre-Accredited Training .....	7
Rural and Regional Victoria.....	7
Remote Learning.....	8
Skills First Reconnect.....	9
Opening Pathways .....	9
Infrastructure Projects .....	12
Support for Students.....	12
Fees and Costs .....	14
Conclusion.....	16

## About ECCV

The Ethnic Communities' Council of Victoria Inc. (ECCV) is the voice of multicultural Victoria and the peak advocacy body for eight regional ethnic communities' councils and 220 member organisations, including ethnic and multicultural organisations across Victoria. For over 45 years, we have been the link between multicultural communities, government and the wider community.

ECCV has a strong history in advocating for the rights of multicultural communities, informing industry practice and influencing Government on a range of issues including health, employment, aged care, cultural responsiveness, equitable access and the wellbeing of families and children.

ECCV congratulates the Victorian Government on holding this review into the post-secondary education sector in Victoria. We are delighted to have this opportunity to examine Vocational Education and Training (VET) from the perspective of multicultural Victoria. This submission will look at the areas in which we believe that post-secondary education is failing to provide opportunities for culturally and linguistically diverse (CALD) Victorians, look at examples of innovative models and best practice in this regard, and make recommendations about how post-secondary education could be improved to better serve diverse Victoria.

We will particularly examine the barriers that present themselves to people from migrant and refugee backgrounds in accessing VET, such as literacy and numeracy, the role of Foundation Studies and pre-accredited training, the complexities of navigating the sector, thin markets in regional Victoria, fees, and lack of student support services. We will then look at a few examples of how these issues have been overcome through innovative new models, which particularly emphasise the importance of collaboration between large and small training providers, community organisations, and employers and industry. Our hope is that these examples will point the way to the sort of new models that the Government will consider supporting more widely to truly ensure post-secondary education meets the needs of multicultural Victoria.

## Summary of Recommendations

ECCV is pleased to present the following recommendations:

1. That VET providers are supported to provide Foundational English literacy and numeracy skills to students from non-English speaking backgrounds alongside industry qualifications as part of a dual qualification.
2. That the Victorian Government support TAFEs and RTOs to apply more flexibility in English language literacy and numeracy requirements to enable a greater focus on industry-specific English while removing any undue barriers to accessing preferred pathways.
3. That future contracts with Skills First Reconnect providers contain indicators of success involving numbers of enrolments, program completion rates, and percentage of participants who move into employment at the completion of their training.
4. That the Victorian Government promote and provide funding support for innovative, collaborative models aimed at supporting new migrant groups into and through vocational training, especially in regional Victoria.
5. That the Victorian Government encourage and provide funding for a greater amount of pre-accredited training for targeted groups, delivered by or in partnership with relevant industry bodies and/or employers.
6. That the Department of Education and Training encourage and provide funding for collaborative, partnership-based models of VET and higher education that take advantage of the safe and supportive environment of Learn Local organisations.
7. That future infrastructure contracts require major projects and infrastructure contractors to engage with and recruit disadvantaged jobseekers directly and ensure that quality training and support providers are engaged to better support learner/worker success.
8. That the example of the Wurreker Strategy as targeted at Koorie students be replicated by the Victorian Government for CALD learners, and that a statewide CALD post-compulsory education engagement strategy be delivered by a trusted statewide community provider such as ECCV or AMES.
9. That greater flexibility is introduced in the application of the upskilling rule and 2 at level rule for students from vulnerable backgrounds, to ensure that cost is never a barrier for marginalised people looking for pathways into employment.
10. That Victorian Vocational Education and Training adopt a model for student fees more closely aligned to that used by New South Wales TAFE, in which cost is based on the means of the student as a universal principle, not the nature of the course.
11. That the caps on the number of hours per course that Learn Locals can provide are either increase or removed, to allow for more students to take advantage of courses with high demand, particularly where there is an alignment with skills and industry demand.

## Background and Context

The extent to which Australia meets its potential as an inclusive multicultural society is likely to be largely determined by a few key factors. Chief among these are the extent to which migrants, refugees, and people from culturally and linguistically diverse backgrounds are able to access pathways into sustainable employment, and acquire the skills and training to achieve this. Educational attainment and employment outcomes are crucial for the health, wellbeing and cohesion of migrant communities, particularly new and emerging communities and for people from refugee backgrounds, to enable a successful settlement experience and full participation in the Australian economy and society.

As the Skills for Victoria's Growing Economy Issues Paper notes, increasing technological changes are set to massively alter the Victorian economy and the nature of the work that Victorians do. There will be an increasing need for workers to keep updating their skills as technological and other changes drive increasingly different demands by industry and employers for skills. A strong, flexible and accessible vocational education and training sector will consequently become more important than ever.

The identified changes to the nature of the labour market make it even more crucial that the post-compulsory education system is accessible to CALD Victorians. However, ECCV believes that there are a number of systemic issues that diminish its capacity to properly assist vulnerable Victorians, including new migrants and those with limited English language skills. Students from disadvantaged backgrounds have both lower completion rates of post-secondary education, and lower rates of success in finding employment after completion. Recent research indicates that students from a disadvantaged background have a completion rate 6% below that of other students.<sup>1</sup> More worryingly, students with low English proficiency have been found to have a 45% lower chance of finding a job upon completion of VET, compared to native English speaker graduates.<sup>2</sup> This indicates serious issues around the ability of VET to provide pathways into employment for those who need pathways support most.

ECCV does not intend for this submission to provide a comprehensive review of the entire post-secondary education system in Victoria. Instead it will give a broad overview of why we believe the system is proving inadequate in some important respects for CALD Victorians, the areas in which it is failing to meet its potential, and provide some examples of innovations and new models that we believe could serve as models for positive change and influence throughout the sector.

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<sup>1</sup> Duncan McVicar and Domenico Tabasso, Melbourne Institute of Applied Economic and Social Research, [Research Report: The impact of disadvantage on VET completion and employment gaps](#), p.8.

<sup>2</sup> McVicar and Tabasso, p.9.

## Key Themes

### Barriers to Access

Before examining how Vocational Education and Training can better support students from CALD backgrounds and provide pathways into employment, it is important to consider the accessibility of VET for Victorians from a CALD background. As described on page 37 of the Issues Paper, the proportion of VET students from a CALD background is increasing, but ECCV remains concerned that significant access barriers remain for community members with limited English, and for individuals from more isolated and newly emerging migrant communities.

### Literacy and Numeracy

ECCV is particularly concerned that literacy and numeracy requirements are not sufficiently flexible so as to not create barriers for people from non-English speaking backgrounds, or who have had interruptions to their earlier education. ECCV believes that literacy and numeracy testing for entry into VET is not an inclusive process. Test questions often create cultural barriers through the design of questions that are alien to the prior experience of migrant and refugee learners. These may not reflect the capacity of migrant and refugee students to learn and be successful, and therefore exclude them from even starting on vocational pathways. It is imperative that this review considers how VET could better assist students who face issues with literacy and numeracy, rather than letting their differences or support needs deny them any chance of progression into and through vocational training.

Foundational Skills therefore play a key role in providing the language, literacy and numeracy skills to assist individuals from non-English speaking backgrounds into and through VET (as well as the employability skills to ensure students are job ready at the other end). Ideally Foundational Skills would be blended with an industry qualification being delivered in parallel as a dual qualification to support migrant and refugee students. ECCV also believes that TAFEs and Registered Training Organisations (RTOs) should consider moving towards a greater focus on industry-specific literacy. Employability in some industries requires a specialised knowledge of only certain English vocabulary. Government-mandated English literacy testing for TAFEs does not allow for the reality that standards of English proficiency required for employment are not the same across all industries.

#### **Recommendation 1**

**That VET providers are supported to provide Foundational English literacy and numeracy skills to students from non-English speaking backgrounds alongside industry qualifications as part of a dual qualification.**

#### **Recommendation 2**

**That the Victorian Government support TAFEs and RTOs to apply more flexibility in English language literacy and numeracy requirements to enable a greater focus on industry-specific English while removing any undue barriers to accessing preferred pathways.**

## Pre-Accredited Training

ECCV believes that pre-accredited training is not sufficiently valued and respected by RTOs and the TAFE sector (as well as by employment services providers and employers). This means that students are not properly supported in terms of recognition of prior learning.

In many cases it would be preferable for pre-accredited training to be delivered by or in partnership with industry. Learn Local providers have however reported to ECCV that they find it difficult to develop the sorts of relationships with industry that would support their students into employment, as employers too often place insufficient value on their capacity. A positive step in this direction has been the recent acceptance of pre-accredited training by Centrelink as part of the Job Plan of jobseekers. Jobactive providers must be encouraged to make use of this for disadvantaged clients needing extra support to enter vocational training.

ECCV would also like to see greater clarity being provided by government, Jobactive providers, and training organisations to new migrants and disadvantaged jobseekers to help them better understand what is non-accredited, what is pre-accredited, and what is accredited training, and what the differences are. A Learn Local might offer different English language classes of each type, and it can be very hard for an individual to know which is right for them. Community consultations have revealed to ECCV a deal of confusion about this in various communities.

## Rural and Regional Victoria

ECCV is pleased with the emphasis that the Review is placing on the particular issues facing post-secondary education in rural and regional Victoria. We agree with the points raised in the Issues Paper, namely that thin markets in regional areas limit education and training options, and that such options as often are available do not meet the needs of regional employers. ECCV is particularly concerned about this now that larger numbers of migrants from new and emerging communities are settling in regional centres, which often lack the support services available in cities. We believe that stronger educational outcomes are necessary for sustainability of settlement.

Thin markets exist because for most VET providers, and particularly TAFEs, training is first and foremost a numbers' game, and the numbers of potential students in regional centres are simply not sufficient to provide an incentive for TAFEs to invest in them.

Victoria's regional centres have often relied on local employers acting as champions in employment of particular migrant groups. In Western Victoria, for instance, Luv-a-Duck in Nhill and Australian Wildflowers farm near Horsham have emerged as notable champions over the last decade. These employers have been fantastic for their local Karen communities and made an inestimable contribution to the success of settlement. Care however needs to be taken to guard against complacency in these communities, and to ensure that further innovation is not discouraged.

### **Best Practice Example: Nhill and the Karen Community**

Nhill has experienced problems familiar to many towns its size in regional Victoria, with a declining and ageing population brought on by the migration of many young people to Melbourne and other larger centres. However new life has recently been brought to the town by large numbers of Burmese Karen who have moved there since 2010 as secondary migrants. They were drawn by the promise of work with Luv-a-Duck, the duck meat grower and processor that is the town's main employer. There are now more than 200 Karen living in Nhill, and they have found employment with several organisations besides Luv-a-Duck.

Through all this the Nhill Learning Centre has provided both settlement services and all-round support to the Karen community. It has played a particularly important role in supporting the wives of the men who have taken up the factory jobs. Through funds provided by the Adult, Community and Further Education (ACFE) Board, Nhill Learning Centre has provided English language and other pre-accredited training to the Karen community. English has been taught through the Centre's social enterprise, which teaches gardening and other lifestyle skills, but is primarily focused on improving participants' English.

As it has expanded to meet the needs of the Karen community, Nhill Learning Centre has looked at how it can support other local young people, many of whom leave school without a VCE or VCAL. The Centre now partners with a local health service and with Sunraysia Institute of TAFE to offer certificate training and open pathways for local youth. The Centre's work provides an excellent example of pre-accredited and accredited training working successfully alongside each other.

Regionally-based ethnic communities' councils have also emphasised that training provision is not closely enough aligned with regional skills shortages. In particular, there is now acknowledged to be an oversupply of childcare, disability and aged care workers, and skills shortages in agriculture, food manufacturing, transport and logistics, and allied health. This review will, we are sure, look in more detail at the nature and location of specific shortages, and ECCV encourages it to consider further encouragements for migrant populations to settle in these areas and help fill the shortages.

## **Remote Learning**

As noted in the Issues Paper, Victoria severely lags the rest of the nation in the provision of online learning. This provides a particular barrier to accessing education and training for members of new and emerging communities in regional areas, who often lack transport options. Federation University's Horsham TAFE campus is about an hour by car from Nhill, meaning that it is not accessible for most of Nhill's Karen community.

The forced move to online learning precipitated by the COVID-19 crisis could have positive benefits in this regard, as it has required TAFEs to create online learning infrastructure that will be a legacy long after the crisis has passed. Nhill Learning Centre has begun working with AMES to develop a model that combines remote teaching with onsite facilitators to assist students with the practical elements of their training. Such a hub-and-spoke model would greatly improve accessibility, and ECCV urges the government to monitor how successful it is in increasing student numbers from the regions. There are limits to how far such a model could go, as some courses have practical elements

that are not suited to online learning, and the physical infrastructure, such as high-speed broadband, is not sufficient in many areas to allow for online learning. It is however an area in which this Review could help to create progress.

## Skills First Reconnect

ECCV believes that the Department of Education & Training's Skills First Reconnect program has identified a key need in aiming to support young Victorians who have not completed secondary education with a second chance to obtain a qualification. During its development, Reconnect was envisaged by many involved in its design as a wraparound service, providing support for disadvantaged youth entering, during, and upon completion of VET. While many Reconnect providers do indeed provide valuable services to disadvantages students at all stages of their post-secondary education, ECCV believes that the program in its current form is hamstrung by using as its measure of success the number of enrolments that it achieves. With such an incentive at play for providers, it is not unreasonable to ask if Reconnect is achieving real outcomes in terms of completed qualifications and employment outcomes?

### **Recommendation 3**

**That future contracts with Skills First Reconnect providers contain indicators of success involving numbers of enrolments, program completion rates, and percentage of participants who move into employment at the completion of their training.**

## Opening Pathways

Having examined some of the barriers that can inhibit Victorians from CALD backgrounds from accessing post-secondary education, we will now turn attention to some further models of best practice in developing pathways. These examples, although often quite small and localised, provide valuable examples of the sort of innovative models that we recommend the government consider investing in throughout the state.

### **Best Practice Example: Bendigo TAFE and the Karen Community**

Like Nhill, Bendigo has recently seen a growing Karen community establishing itself in the city. And as in Nhill, the Karen community consists almost entirely of humanitarian migrants to Australia who lack formal qualifications. Through a partnership with Matchworks Jobactive, Bendigo TAFE Skills and Jobs Centre recently identified the need for targeted support to assist in getting better technical skills for Karen youth, and set about forming an alliance of partners to achieve this.

The project became a collaboration between the Skills and Jobs Centre, Loddon Campaspe Multicultural Services (LCMS), Bendigo Senior Secondary College, Matchworks and People Plus Jobactive providers, and the Bendigo TAFE Engineering Department. The aim is to provide the Karen youth a Certificate II level engineering qualification.

To create awareness and interest in the course, Bendigo TAFE arranged tours of local factories for Karen youth, to show them what work is available and gauge their level of interest in studying in

this area. Further tours were arranged of the TAFE Engineering Department. 22 Karen youth (all male, ages 17-29) expressed strong interest in the course, and 16 eventually enrolled. Of these, 6 were referred from Bendigo Senior Secondary College, and the rest through the two Jobactives.

To prepare the students for their entry to post-secondary education, LCMS used the ACFE Board funding it receives as a Learn Local to provide lead-in studies that taught engineering terminology, additional English skills, and some workplace training. This was done on campus to accustom students to the campus environment prior to the commencement of formal study.

The Department of Premier and Cabinet provided funding for bilingual support and for the cross-cultural training of engineering teachers, to familiarise them with the use of interpreters and how to provide a safe space for their new students. Connections were made with industry through a local manufacturing group, to provide mentoring and student placements. When the pilot began at the start of 2020, exceptionally high levels of student engagement were recorded, and early signs are that the collaborative approach will provide positive results. Unfortunately the COVID-19 crisis has led to the suspension of the course, and will delay its completion until at least September.

Bendigo TAFE and its partners hope that this program can serve as a model for further vocational training for new migrant communities, which will aim to have a focus on older people and women. Funding of language support services will be critical to enable this.

#### **Recommendation 4**

**That the Victorian Government promote and provide funding support for innovative, collaborative models aimed at supporting new migrant groups into and through vocational training, especially in regional Victoria.**

#### **Best Practice Example: Sunraysia Mallee Ethnic Communities' Council Pre-Accredited Training**

In north-western Victoria, Sunraysia Institute of TAFE began offering Free TAFE courses in 2019, opening up a new pathway into TAFE for people from disadvantaged backgrounds for whom TAFE had previously been cost prohibitive. Concerned by a drop-out rate of close to 80% for local Free TAFE students, Sunraysia Mallee Ethnic Communities' Council (SMECC) and several other training providers received ACFE Board funding to pilot a model providing pre-accredited training in English for currently-enrolled Free TAFE students.

SMECC has had previous success with a program providing pre-workplace training and assistance to migrant communities to help them to find factory jobs, designed in consultation with local employers and tailored to suit their needs. This collaborative approach proved successful as 10 out of 12 participants gained employment upon completion, and SMECC hope for similar results with the current Free TAFE pilot when it is assessed in October. An even better model would be for pre-accredited English training with an industry-specific focus to be delivered by or in partnership with industry, but this would be dependent on raising industry awareness of its value and thereby getting employer commitment to build it into their recruitment plans and staff training programs.

### **Recommendation 5**

**That the Victorian Government encourage and provide funding for a greater amount of pre-accredited training for targeted groups, delivered by or in partnership with relevant industry bodies and/or employers.**

### **Best Practice Examples: Wyndham Community & Education Centre Collaborations**

In Melbourne, Wyndham Community & Education Centre took the lead in arranging for the re-training of workers who were set to lose their jobs when Toyota Australia and Toyota Boshoku announced that their factories would be closing. A program was designed to help the manufacturers' workforces, particularly those from a Vietnamese background, who needed help with their English to be able to move into new employment. Many expressed fear that they would never be able to find another job, as their work at Toyota was the only job they knew how to do. Many did not have a resume or even an email address.

Wyndham CEC therefore created the Learn Local Automotive Supply Chain Initiative, a collaborative partnership with Toyota Boshoku and Toyota Australia, the National Union of Workers (NUW), Choice Career Services (the Jobs Victoria provider for ex-auto workers in the western region), the Gordon Skills & Jobs Centre and the Victorian Polytechnic Skills & Jobs Centre. Through the NUW, Wyndham CEC also connected with Sakata (PepsiCo) for assistance in the delivery of training.

Training was provided between shifts at the Toyota factories, and concentrated on digital literacy, job searching and job applications, preparing for job interviews, and workplace communication. Participants gained the skills and confidence to be able to apply for jobs, write positively about their time at Toyota, and attend interviews. Strong relationships were developed between all partners in the project, and it had excellent results, with approximately 80% of participants in the program finding employment upon completion. This project provides a good model of how a Learn Local can deliver flexible and effective pre-accredited training through engagement with industry.

Previously Wyndham CEC had formed a partnership with Federation University Australia to deliver the BA@Wyndham program. This program provided access to higher education for 30 young people previously disengaged from mainstream schooling, taking advantage of the supportive Learn Local environment to undertake a Bachelor of Arts. It aimed to show that a university education was still attainable for young people with a non-traditional secondary education. The course involved project work in which students learned to develop social research skills, and was the first of its kind to deliver higher education through a Learn Local organisation.

Wyndham CEC and FedUni worked closely to develop a model in which students were supported academically and socially as they adapted to higher education. Although this program did not receive the funding to enable it to continue, it was a groundbreaking program that demonstrated that a completely new type of educational journey was possible. Its success was recognised when it won the *Excellence in Creating Local Solutions* award at the 2016 Victorian Learn Local Awards. Although it was not specifically targeted at CALD youth, it provides a model that could open up opportunities for all disadvantaged youth.

### **Recommendation 6**

**That the Department of Education and Training encourage and provide funding for collaborative, partnership-based models of VET and higher education that take advantage of the safe and supportive environment of Learn Local organisations.**

## Infrastructure Projects

ECCV is pleased that the Victorian Government has made efforts to ensure that disadvantaged jobseekers are included in the procurement processes of its major infrastructure projects, as outlined in its *Social Procurement Framework 2018*. We believe that setting targets for employment of disadvantaged jobseekers and embedding social procurement objectives into evaluation criteria for government contracts has the potential to significantly improve the outlook for the state's disadvantaged jobseekers.

However we have been concerned to learn that infrastructure projects are recruiting disadvantaged jobseekers through labour hire companies rather than working with training providers. Infrastructure companies should instead engage directly with quality training providers and ensure a shared commitment to the success (training and employment) of vulnerable workers engaged on infrastructure projects.

This will ensure that the risks of engaging and supporting vulnerable learners, including Victorians from migrant and refugee communities, are mitigated through appropriate holistic supports, so that an individual's training and development needs are met and positive employment outcomes are sustained.

### **Recommendation 7**

**That future infrastructure contracts require major projects and infrastructure contractors to engage with and recruit disadvantaged jobseekers directly and ensure that quality training and support providers are engaged to better support learner/worker success.**

## Support for Students

There is a clear need for comprehensive student support services to be available to assist any student facing issues that impact their ability to fully engage with their education and training. ECCV believes that student support services at Victoria's VET providers and institutions need to consider providing dedicated support for their culturally and linguistically diverse student bases, and particularly for members of new and emerging communities on campuses.

Institutions of higher learning now all have dedicated support for their Koorie students, and ECCV believes that these provide a model for the sort of support services that should be available for students from new and emerging communities. The Victorian Aboriginal Education Association's (VAEAI) Wurreker Strategy<sup>3</sup> has created a network of brokers and programs that assist Koorie

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<sup>3</sup> <https://www.vaeai.org.au/vet-training/> [Accessed 4 June 2020]

students by providing information about study, education and training options, informing them about available pathways into centres of learning, and what services are available to support them as they undertake further education or look to move into employment.

The success of the Wurreker Strategy, as delivered by VAEAI in partnership with the Department of Education and Training, Victoria's TAFEs and industry, is something that should be replicated to better support vulnerable groups from CALD communities. Such a strategy should aim to ensure that CALD Victorians can get the dedicated cultural, linguistic and social support needed to be successful within formal learning and employment environments.

#### **Recommendation 8**

**That the example of the Wurreker Strategy as targeted at Koorie students be replicated by the Victorian Government for CALD learners, and that a statewide CALD post-compulsory education engagement strategy be delivered by a trusted statewide community provider such as ECCV or AMES.**

#### **Best Practice Example – VICSEG Bi-lingual Trainer/Worker Model**

The Victorian Cooperative on Children's Services for Ethnic Groups (VICSEG) is one of Victoria's largest and most experienced providers of vocational education and training for people from a CALD background. It provides certificate, diploma and advanced diploma level training in aged care, early childhood education, community services, health, youth work, clothing and textile production, and other accredited short courses. Its students are all newly arrived migrants, refugees and asylum seekers, and are mostly women from a variety of age groups.

The success of VICSEG's training model has been attested to by its community partners and by the students themselves, with 93.3% of VICSEG students in 2019 saying they were satisfied with the training they had received, compared to a statewide average of 77.5%.<sup>4</sup>

A major component of VICSEG's success is its use of a training model involving bilingual and bicultural workers, and family mentors. By employing staff largely from similar cultural backgrounds to their students, VICSEG ensures that its teachers understand the culture of their students and can teach them more effectively, even though the teaching itself is mostly in English. Many of the teachers are migrants who are ahead of their students on the migration pathway by 10-15 years, and can share knowledge and advice from their experiences.

Students from migrant backgrounds often encounter difficulties in training due to unfamiliarity with the Australian services sector. For instance, early childhood education in Australia is based around social development and learning through play, as opposed to the focus on numbers and counting that many migrants are more familiar with. Australian early childhood education also places a greater premium on inclusiveness, with less emphasis on special schooling for children with developmental difficulties. These can be difficult concepts for new migrants to understand, but VICSEG's staffing model helps to ensure that students always have someone they can approach for help to understand technicalities and better navigate the system.

Family mentors have the necessary knowledge of Australian services systems to help their students make links and build networks, introduce them to other men and women ahead of them

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<sup>4</sup> VICSEG New Futures (21203), [2019 RTO Performance Summary Report](#)

on the settlement path, assess their needs, and help them to plan their moves into employment or further education with VICSEG or elsewhere. It is a model that continues to open up exciting opportunities for some of Victoria's most vulnerable migrants.

## Fees and Costs

The regulation of fees for VET students is complex, often inconsistent, and remains a barrier for people from disadvantaged backgrounds to enter VET. The "upskilling rule" (that prevents government subsidies for training that is not at a higher level than a qualification currently held), presents a barrier to re-training that is at odds with the acknowledgement that changes to the nature of the economy will require workers to undergo regular re-training to keep their skills up-to-date. For instance, a person who holds a diploma level qualification may wish to do a Certificate IV in Disability in order to take advantage of the many employment opportunities opening up through the NDIS, but would not be financially supported to do so.

This issue is particularly relevant when considering the effects of COVID-19 on Victoria's employment market. This unprecedented shock has left many people looking to move into different industries with better employment prospects, but the upskilling rule may greatly diminish their options. Similarly, the "2 at level" rule can also inhibit individuals' options for re-training or for the implementation of a dual qualification mode to better support CALD learners in their participation in the VET system. There needs to be more opportunity for exemptions to these rules for members of marginalised groups.

### **Recommendation 9**

**That greater flexibility is introduced in the application of the upskilling rule and 2 at level rule for students from vulnerable backgrounds, to ensure that cost is never a barrier for marginalised people looking for pathways into employment.**

In Victoria, different courses are funded at different rates, so a vulnerable migrant undertaking, for example, a construction course, must pay the set fees regardless of their background if they are not deemed eligible for concession rates or fee waivers. This is in contrast to New South Wales, which allows free enrolment in any course for students deemed to be from a vulnerable and marginalised background. This much more straightforward and inclusive system is at once easier to understand, less bureaucratic and discretionary, and much more likely to lead to inclusive educational opportunities.

### **Recommendation 10**

**That Victorian Vocational Education and Training adopt a model for student fees more closely aligned to that used by New South Wales TAFE, in which cost is based on the means of the student as a universal principle, not the nature of the course.**

For Learn Locals, each course is funded for a set number of hours, so that the Learn Local can only deliver this number of hours of training per course, which effectively caps the number of students they can have per course. These caps limit the potential of Learn Locals to provide a pathway to

TAFE for larger number of students. ECCV hopes that this review will consider increasing the caps or removing them altogether, to allow for Learn Locals to grow and for people from disadvantaged backgrounds to have more opportunities to take advantage of the safe, community environment that they provide as preparation for further pathways.

**Recommendation 11**

**That the caps on the number of hours per course that Learn Locals can provide are either increased or removed, to allow for more students to take advantage of courses with high demand, particularly where there is an alignment with skills and industry demand.**

## Conclusion

ECCV commends the Victorian Government for establishing this review of post-secondary education in Victoria. We are very pleased to have this opportunity to be able to examine the key issues facing the sector from the perspective of culturally and linguistically diverse Victorians.

Educational attainment and pathways into sustainable employment are crucial for the health, wellbeing and cohesion of migrant communities, particularly new and emerging communities and for people from refugee backgrounds, and are amongst the key enablers of a successful settlement experience and full participation in the Australian economy and society.

Although there are many more challenges and opportunities in post-secondary education than we have been able to cover in this submission, we believe that we have drawn attention to the most significant issues. CALD Victorians face a number of access barriers to vocational education and training, such as literacy and numeracy, fees, complexity and navigational difficulties, lack of student support services, and the thin markets and other difficulties in regional Victoria. There are however a number of different approaches that we believe can help to overcome these barriers, and this submission highlights several innovative new models, which particularly emphasise the importance of collaboration between large and small training providers, community organisations, and employers and industry. Our hope is that by highlighting these innovations, the Government will consider supporting them more widely in order to ensure that post-secondary education fully meets the needs of multicultural Victoria.

ECCV thanks the Victorian Government for considering our recommendations. We look forward to being involved in further work and discussions about how post-secondary education in Victoria can best meet the needs of culturally and linguistically diverse communities and achieve the best possible outcomes in the years ahead.