







# **VCOSS Submission to the Victorian Government's Consultation for Senior Secondary Reform**

**August 2021**

The Victorian Council of Social Service is the peak body of the social and community sector in Victoria.

VCOSS members reflect the diversity of the sector and include large charities, peak organisations, small community services, advocacy groups and individuals interested in social policy.

In addition to supporting the sector, VCOSS represents the interests of Victorians experiencing poverty and disadvantage, and advocates for the development of a sustainable, fair and equitable society.

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This submission was prepared by Talisha Ohanessian and authorised by VCOSS CEO Emma King.

For enquiries please contact Deborah Fewster at [deborah.fewster@vcoss.org.au](mailto:deborah.fewster@vcoss.org.au)

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VCOSS acknowledges the traditional owners of country and pays respect to past, present and emerging Elders.

This document was prepared on the lands of the Kulin Nation.



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# Introduction

The Victorian Council of Social Service (VCOSS) welcomes the opportunity to provide input into the Victorian Government's Consultation for Senior Secondary Reform.

VCOSS is the peak body for social and community services in Victoria. VCOSS supports the community services industry, represents the interests of Victorians facing disadvantage and vulnerability in policy debates, and advocates to develop a sustainable, fair and equitable society.

VCOSS acknowledges the Victorian Government's commitment to ensuring all senior secondary students have access to high-quality learning that suits their needs and interests. The Firth Review provided a welcome opportunity to look at strengths and weaknesses of the VCAL and VCE, and identified opportunities for reform to the current senior secondary certificates.

While we commend the work that is underway to take forward the Review's recommendations, VCOSS members have expressed concern that government has allowed insufficient time for students, community organisations, parents, and carers to engage with the proposed changes. Stakeholders acknowledge that the proposed reforms have come off the back of community consultation in early 2020, however, that consultation was broad. There is significant complexity to grapple with in this next stage of the reform process. There is concern amongst VCOSS members that consultation has not happened early enough with key stakeholders to inform the reform design.

Government consultation has coincided with a fifth lockdown in Victoria, returning teachers and students to remote and flexible learning. This has shifted the focus for students and families to the immediate future, with concern from across the community that this lockdown is not 'business as usual' — the effects of working and learning from home, restriction of movement that creates distance between family and friends and a pause on recreational activities, are being felt more acutely.

Community sector organisations who play an important role in supporting the wellbeing of school communities have had to pivot to alternate forms of delivery while focusing on supporting students, families and workforce who are experiencing increased distress as a result of the lockdown – leaving limited time and capacity to engage in this significant piece of reform.

VCOSS members also note that this reform process is occurring concurrently with other flagship reforms, such as the design of the School Mental Health Fund and consultation on the Department's Climate Adaptation Action Plan. Consequently, many VCOSS members have indicated they have no capacity to engage with this consultation on reforms to senior secondary certificates given the narrow window for consultation and competing demands.

Concerningly, members also told us that although the students and families they support will be significantly impacted by changes to the VCAL, the consultation process is inaccessible for most of them. To ensure these reforms are backed by the community, more work is needed to meaningfully engage with students, families, education providers, community sector organisations and industry, and provide opportunities for robust discussion about the impact and implications of these changes.

# Opportunities and challenges

The introduction of a new vocational specialisation stream within the VCE to replace the Intermediate and Senior VCAL, and a new Foundation Pathways Certificate to replace Foundation VCAL presents a range of challenges and opportunities, as outlined below.

## Communication and consultation

A key challenge will be communicating at each stage of the reform process, to ensure all stakeholders have the knowledge, information and support needed to provide robust feedback, make informed decisions about pathway choices, implement the reforms and successfully support students to transition into further education, training or employment.

In addition to the information outlined in the introduction, VCOSS members raised concerns about communication and consultation with:

- Schools and principals, including non-government flexible learning schools that specialise in providing support to learners with complex needs and who have experienced significant disengagement from education, and;
- Industry and employers.

Schools will need comprehensive support to understand and then implement the full suite of reform changes. The reforms are significant and, in parts, complex. For schools who will be new to delivering vocational and applied learning, or those who have previously struggled in the past to offer high-quality vocational and applied learning programs, there is a risk that without sufficient time and support they may struggle to successfully implement the new certificates, students will fall through the cracks and the secondary system will lose much-needed educators to TAFEs and Registered Training Organisations.

While the Department of Education and Training (DET) has primary responsibility for ensuring government schools are supported throughout the reform process, flexible learning schools will also need particular attention given their student cohort and need for flexibility in delivery. Some flexible learning school principals have told VCOSS they are not being provided with sufficient information at this stage of the process. For example, we have heard that in the flexible learning school space, there is limited awareness that DET is proposing to introduce the General Assessment Test (GAT) for students undertaking the vocational specialisation stream. There are concerns that – as a consequence – the consultation

process is not providing these stakeholders with sufficient opportunity to unpack the potential implications for their school and students with DET.

Early and sustained engagement with these stakeholders – and industry groups, employers, training providers and universities – will be vital in assuring the value of the new certificates, to ensure students have access to the full range of post-school pathways.

## Flexibility

Flexibility is a core component of vocational and applied learning. Flexibility supports students to remain actively engaged in their education. A flexible approach also assists educators and education support staff to provide a pathway back for disengaged/re-engaging learners.

The focus on flexibility will need to be maintained as the reforms progress to ensure it remains at the core of the new senior secondary certificates. Flexibility is fundamental to inclusive education offerings, meeting the differing needs of students in mainstream and special schools, and flexible learning settings. For example, it will be important to consider timetabling in this reform process – including considerations for staffing and giving students time away from school/class to undertake VET subjects or School Based Apprenticeships or Traineeships (including HeadStart).

During the design of the reforms, careful consideration will need to be given to how the reforms can be implemented in flexible learning schools, which play an important part in re-connecting the state's most disengaged learners with senior secondary education. VCOSS encourages DET to work closely with these providers during the design process, to ensure flexible learning schools are set up for success in the implementation phase. It is vital that these schools be able to deliver the new certificates in a way that is compatible with their unique, evidence-informed student engagement models.

***“As long as we have the ability to flex – that’s the most important thing” – Principal, Flexible Learning School***

## Empowering students

The Victorian Government has demonstrated its commitment to empowering student voice through the creation of the Amplify,<sup>1</sup> which makes it mandatory for every secondary school council to elect students and accord them with full voting rights, and through the creation of a dedicated position on the board of the Victorian Curriculum and Assessment Authority.

However, more can be done to increase the level of autonomy and power that students have in relation to their individual pathway.

Mandating nine and 11 of the 16 minimum units for the vocational specialisation and Foundation Pathways Certificate respectively, reduces the choice and breadth of subjects for students.

Students undertaking VCE have significantly more choice and self-direction in their learning.

It is important that the new vocational specialisation stream and Foundation Pathways Certificate balance mandatory units to give students the skills they need to successfully transition from senior secondary school to further pathways, while ensuring an appropriate level of student choice and autonomy.

VCOSS believes the proposed mandatory units should be subject to more extensive consultation with students before a final determination is made. VCOSS members have raised concern about the level of engagement and consultation with students on the reforms to date.

Students are **the** key stakeholder in education reform. Consultation with students needs to begin early and be sustained throughout the process to ensure students understand the changes and can influence the reforms to reflect their aspirations for their educational journey. There is also a particular need to engage with students targeted for the Foundation Pathways Certificate to ensure this new design reflects their hopes and further pathway options.

## Workforce

Changes to the senior secondary certificate have significant workforce implications for vocational teachers and the technical industry workforce. Several VCOSS members raised

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<sup>1</sup> Victorian Department of Education and Training, *Amplify: Empowering students through voice, agency and leadership*, 2019.



concerns about current workforce shortages, noting schools are currently unable to employ appropriate technical teachers for VET programs while industry is facing its own workforce shortages exacerbated by COVID-19.

Additional aspects of workforce raised by VCOSS members include:

- The need to support vocational teachers to ensure those who have the right approach to working with students who have traditionally undertaken VCAL are not lost due to qualification requirements.
- Ensuring vocational teachers' teaching loads provide sufficient time to plan and support individual learner needs.
- The need to remove barriers to entry for prospective vocational teachers. VCOSS members have had conversations with people in industry who expressed an interest to work in a VDSS (VET delivered in secondary school) program, but did not pursue this pathway because the process is onerous and too difficult. DET could help attract highly skilled educators into the senior secondary system – and ensure schools have the ability to deliver the reform agenda – by removing administrative and other process barriers.
- Teaching loads also need to reflect the skill sets and expertise of teachers, rather than timetabling availability.

## The role of VET and Structured Workplace Learning

Increased access to VET and Structured Workplace Learning (SWL) is welcome, and, if schools are supported to implement the reforms successfully, will see an increase in the number of senior secondary students pursuing opportunities that align with their interests.

Secondary students often access VDSS (confusingly also referred to as VET in Schools or VETiS) programs at school, delivered in-house or at another school through a VET cluster, rather than through TAFE.

VCOSS members expressed concern that VET clusters may struggle to absorb additional demand as a result of expanded provision through the reforms. They noted that many VET clusters are already at capacity. Ensuring students have access to a breadth of high-quality VET subjects is integral to the success of these reforms. There must be a strong focus on

the role of VET clusters and Trade Training Centres – they will need to be appropriately consulted, resourced and equipped to meet increasing demand of VDSS.

For students seeking to access VET subjects not offered directly by their school, it can be difficult for students and families to understand which subjects are available in their local area. While Local Learning and Employment Networks (LLENs) have resources that provide a range of options for students, these may not be visible to the entire school community.

As part of these reforms, consideration should be given to a broad communications campaign to raise awareness of resources that enable students and families to see which subjects are available in their local area.

For example, WynBay LLEN's 'Wyndham VETiS Partnership' and 'Hobsons Bay VETiS Partnerships' booklets provides information about which schools are included in the VET cluster, which subjects are available, when and where, and if it is a supported program.<sup>2</sup> This is invaluable information but its existence may not be widely known locally, and students and families living in other parts of the state may not necessarily have comparable information.

There is a need to create a central repository of this information so that it is readily available to students and families across the state. This should include information about which subjects are "supported programs". This is particularly important for students with disability. There is the opportunity to potentially leverage the existing website for SWL as one option for integrating this information.

As DET works through the certificate reforms with other stakeholders, DET will need to work closely with LLENs who facilitate SWL to ensure they can meet the needs of students accessing this important learning component. Current funding for LLENs does not meet rising costs in line with the Consumer Price Index and other costs, such as increases in superannuation and the minimum wage. Without additional funding, LLENs will have reduced capacity to support SWL while demand increases.

## Statement of Results

VCOSS members had mixed views about the Statement of Results.

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<sup>2</sup> WynBay Local Learning and Employment Network, VETiS, <<https://www.wynbayllen.org.au/vetis>>, accessed 2 August 2021.

Some members were pleased to see the inclusion of an enhanced Statement of Results to capture the skills, knowledge and achievement of students. They highlighted that the Statement of Results is particularly important for:

- Students who may choose to leave school before completing Year 12.
- Recognising a broader range of skills and experience that considers a learner more holistically.

They emphasised that the Statement of Results should include:

- Essential skills that prepare “young people for work, active citizenship and, most importantly, lifelong learning.”<sup>3</sup>

For example, the 2020 Shergold report *Looking to the Future* identified, in addition to literacy, numeracy and digital skills, every young Australian should develop the following skills throughout their schooling:

- life skills; interpersonal skills and communication; critical analysis and evaluation; teamwork and collaboration; problem solving; resilience and self-care; planning, organisation and accountability; workplace initiative; entrepreneurial skills and innovation; and active citizenship.<sup>4</sup>

The Statement of Results should have the capacity to capture these important skills.

- How far a student has progressed. The concept of “distance travelled”<sup>5</sup> acknowledges that students begin their senior secondary schooling at different starting points, including socially, emotionally, and academically. This would broaden the understanding and value of ‘successful outcomes’ and reflect a strengths-based approach.

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<sup>3</sup> Shergold et al., *Looking to the Future – Report of the review of senior secondary pathways into work, further education and training*, Education Council, June 2020, p. 38.

<sup>4</sup> Shergold et al., *Looking to the Future – Report of the review of senior secondary pathways into work, further education and training*, Education Council, June 2020, p. 39.

<sup>5</sup> K Te Riele, M Davies & A Baker, *Passport to a Positive Future: Evaluation of the Melbourne Academy*, The Victoria Institute for Education, Diversity and Lifelong Learning, 2015.

This could include empowering students to reflect on the outcomes they have achieved, including in areas such as increased confidence, motivation and engagement.<sup>6</sup>

However, some members had concerns about the impact of the proposed change, particularly for Foundation Pathways Certificate students. Members noted that the consultation paper proposes that the Statement of Results replaces – rather than complements – the Foundation or Intermediate VCAL certificates that are currently awarded to students. Our members identified some potential drawbacks for students who exit school prior to completing Year 12. These and other matters are explored further under the Foundation Pathways Certificate section of this submission.

## Resourcing

Currently, the cost of education, including VDSS, is a significant barrier for many students and families and can prevent students from low-income households from accessing subjects that align with their interests. New funding arrangements that mean “government schools will no longer request payments from families for essential learning materials for participation in VET”<sup>7</sup> is welcome, but will need to be clearly defined and monitored.

Costs for VDSS aren’t limited only to course materials but extend to costs of travel where the units are delivered at an external campus. The costs of transport should be included in the bucket of funding, to minimise barriers for students in studying their preferred course.

VCOSS acknowledges the Victorian Government is reviewing current funding for vocational and applied learning. Consideration should be given to ensure the funding envelope includes appropriate time for staff to plan and coordinate the reforms.

Consideration should be given to whether dedicated funding should be provided to schools for exclusive use in delivering vocational and applied learning to support delivery of high-quality vocational pathways.

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<sup>6</sup> For example, in the Brotherhood of St Laurence’s 2014 evaluation of its Community VCAL program students were interviewed and provided an opportunity to express how far they had come throughout the year. See G Myconos, *Lessons from a flexible learning program the Brotherhood of St Laurence Community VCAL education program for young people 2010-2013*, Brotherhood of St Laurence, 2014.

<sup>7</sup> Victorian Department of Education and Training, Senior secondary schooling pathways reform, <<https://www.education.vic.gov.au/about/department/Pages/senior-secondary-reforms.aspx>>, accessed 3 August 2021.

## Curriculum

VCOSS welcomes the inclusion of teaching students explicitly about their rights and responsibilities in the workplace and how to meet those responsibilities and advocate for those rights in the vocational specialisation stream.<sup>8</sup> While there is no explicit mention of this in the Foundation Pathways Certificate discussion paper, it should be included in this curriculum also, to appropriately skill students who undertake this pathway, noting some will have aspirations to transition straight into employment.

Similarly, professionalism is an important skill for all senior secondary students to acquire, but it is notably absent on the list of important skills for Foundation Pathways Certificate students in the stakeholder survey question.

Young people have spoken with the Youth Affairs Council of Victoria about a range of reforms they would like to see to the curriculum, including the provision of financial literacy, disability awareness education, and mental health first-aid training and programs that promote positive mental health wellbeing.<sup>9</sup> This feedback underscores the need for DET to actively engage students in reforms to the curriculum.

VCOSS members identified entrepreneurial skills as missing from the proposed reforms. Consideration should be given to including entrepreneurial skills, leveraging place-based opportunities with local employers and other community groups and organisations, and government agencies to increase practical knowledge and understanding.

Members raised concerns about whether schools will be required to offer the full breadth of vocational specialisation and Foundation Pathways Certificate units.

For example, the reforms outline students in the vocational specialisation must complete three Literacy units, which can include units from the VCE English group. Students in the Foundation Pathways Certificate will be required to under two Literacy units, or two units from the VCE English group. However, it is unclear if schools will be required to offer the full breadth of Literacy units to enable genuine student choice. It is important to ensure students have access to subjects that best meet their needs.

If schools do not offer the full breadth of subjects, there may be unintended consequences for students. For example, if a student in the Foundation Pathways Certificate is only able to

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<sup>8</sup> Victorian Curriculum and Assessment Authority, Vocational specialisation stream within the VCE Discussion paper, 2021, p.11.

<sup>9</sup> Youth Affairs Council of Victoria, *Youth Policy Synthesis. Young People's Recommendations for Victoria*, June 2020.

access VCE Literacy units, this may be a barrier to staying in school for students who have re-engaged after a significant time out of education.

An additional consideration is the breadth of the VDSS offering. There needs to be a wide range of high-quality courses that provide students the opportunity to gain micro-credentials that assist in undertaking an apprenticeship, traineeship, or gaining employment post-school.

# Foundation Pathways Certificate

VCOSS members have raised concern the design of the Foundation Pathways Certificate offers minimal value for students' future employment prospects because:

- it is not a senior secondary certificate, and;
- it has insufficient rigour – there are concerns what is proposed does not ensure students have access to the skills (like professionalism, notably absent in the key skills in the survey questionnaire) and experiences (such as Certificate II VET units that provide direct employment pathways) that lead to further training or employment opportunities.

Some members raised concerns the Foundation Pathways Certificate may unintentionally place students that schools categorise as 'difficult' or who have complex needs into a separate pathway that offers students limited post-school opportunities.

More consideration is needed to ensure the Foundation Pathways Certificate is an appropriate substitute for current VCAL offerings, including how the certificate can support students to transition to post-school pathways and create value for prospective employers.

Further changes could include:

- a minimum requirement for students to undertake Certificate II VET subjects with appropriate support, with schools having to provide evidence as to why a student is better suited to undertaking a Certificate I. Certificate III units should be the aspiration, with appropriate support in place to assist students in achieving these goals.
- exploring traineeship or apprenticeship pathways. For example, once students have completed a Certificate II subject, HeadStart could be reoriented as a pathway opportunity for Foundation Pathways Certificate students. Headstart offers high support for both the student and employer, which increases the chances of a successful placement.
- Designing the Foundation Pathways Certificate to enable it to be undertaken and completed in one year, for students in Year 10.

During the consultation period, VCOSS has noted there has been significant confusion associated with the Foundation Pathway Certificate discussion paper. In particular, we observe stakeholders are confused about whether this pathway is available for students in Year 10. VCOSS is concerned that due to this confusion, coupled with limited time for consultation, there may be misunderstanding by families and students wanting to provide feedback. In future rounds of consultation and communication efforts, the Victorian Government will need to ensure key aspects of the reforms are clear and accessible to all stakeholders.

## Flexible learning schools

Flexible learning schools successfully work with students facing complex barriers to education because of their ability to be flexible and adaptable to meet the needs of individual learners. Some aspects of the Foundation Pathway Certificate design will need to allow for additional flexibility to enable these schools to continue to meet the needs of their student cohort. This includes:

- The minimum number of units. Completing 16 units may be a barrier for some students in flexible learning schools.
- The number of hours per unit. Without flexibility in the minimum number of hours, flexible learning schools may be unable to meet the requirements of the certificate. For example, flexible learning schools provide formal and informal learning in the class and would not be able to meet 100 hours per unit.

## A (re)engagement model

The Foundation Pathways Certificate will be an important component of supporting student engagement and re-engagement for learners who have disengaged, or are at risk of disengaging, from education. In addition to the quality and post-school pathway concerns raised above, VCOSS is concerned that DET take action to ensure students in Year 9 and 10 have access to elements of the certificate, including VDSS, to sustain their engagement in school.

While the Foundation Pathways Certificate will be available for students in flexible learning schools, VCOSS understands it has not been designed for students in Year 10 or earlier who are in mainstream settings.

In Victorian government schools, Year 9 students access a range of career pathway activities that are designed to help spark their interests and passions. For students at risk of



disengaging from education, waiting until Year 11 to access a pathway that supports engagement in subjects that align with their interests and skills could have unintended consequences for their participation and retention. With the additional context of COVID-19 and transitions in and out of remote and flexible learning, it is particularly important that students have access to more flexible pathways, including VET, as early as Year 9 or 10.

Offering the Foundation Pathways Certificate to students before Year 11 and 12 could also support the sustainability of delivery, particularly where schools may otherwise choose not to offer the Foundation Pathways Certificate due to concerns that insufficient numbers of Year 11 and 12 students would take up the opportunity.

## Students with disability

VCOSS members felt it unlikely all mainstream schools will offer both the vocational specialisation stream and the Foundation Pathways Certificate, potentially limiting options for students with disability in mainstream schools. Members suggested the Foundation Pathways Certificate could be offered as part of school cluster networks where not all schools make the decision to offer this certificate. This would help to ensure students with disability best suited to this stream don't miss out, and are not filtered into special schools as a result.

Students with disability who attend special schools should be encouraged and supported to undertake Certificate II VDSS subjects. VCOSS members raised concerns that students at special schools may have limited access to VDSS opportunities above Certificate I level. Where students undertake VDSS, consideration should be given to requiring special schools to provide evidence as to why a student is undertaking Certificate I instead of Certificate II to maximise the opportunities for students in these settings to build their skills.

VCOSS members also raised concerns that special development schools will not transition to offering the Foundation Pathways Certificate, despite this being suitable and appropriate for some of their student cohort.

There is limited information available about the interaction between these reforms and special schools and special development schools. This includes DET expectations about delivery and ensuring students with disability have access to the same opportunities to their peers in mainstream schools.

## The role of youth workers

Support from a youth worker can make or break a learning experience. Having a youth worker alongside a teacher in a classroom has been proven to support the education and wellbeing needs of young people facing complex barriers to education and employment.<sup>10</sup>

To support the delivery of the Foundation Pathways Certificate as a re-engagement model, schools should be funded to employ youth workers to work alongside teachers to improve educational and wellbeing outcomes for students. VCOSS members stressed the importance of youth workers in supporting communication and engagement with students, **and** acting as a conduit with parents and carers.

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<sup>10</sup> R Broadbent, K Hart, T Papadopoulos, *The Hester Hornbrook Academy Classroom Youth Worker Research Project*, Final Report, Victoria University, July 2019; VCOSS, *TAFE: Accessible for all*. VCOSS submission to the inquiry into Access to TAFE for learners with disability, October 2020.

## Vocational specialisation stream

There is some trepidation around graded assessments, particularly for learners who may be experiencing mental ill health such as anxiety. VCOSS members stressed the importance of flexibility in how graded assessments are applied with a broad range of examples for how schools can provide graded assessments that meets the needs of their students.

In addition, while students with disability are entitled to access reasonable adjustments, VCOSS members note many students struggle to access these and the process is often onerous and time consuming. Equipping schools with the skills and knowledge to provide reasonable adjustments will be an important component of graded assessments and the GAT. Accountability mechanisms to ensure students with disability are provided with, and able to access, the supports they need should also be implemented.

Members also expressed concern that the introduction of the GAT will have a negative impact on students experiencing mental ill health, which can be exacerbated by undertaking a formal assessment task or exam. For these students, who don't perform their best in formal assessments like the GAT due to anxiety or other mental health concerns, the GAT will not be indicative of what students know and understand.

Consideration should be given to whether the GAT is opt-in rather than opt-out for the vocational specialisation stream. Particular consideration of opt-in rather than opt-out should be given to flexible learning schools and special schools. For example, VCOSS members raised concerns that there is a risk special schools will not offer the vocational specialisation stream, even where this may be suitable for some of their students, in part, because of the requirement for students to sit the GAT.



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