3 April, 2018

To whom it may concern,

Please find attached input from the NSW Adult Literacy and Numeracy Council (NSWALNC) for your consultation about the ‘case for change’ in the TAE training package. The Council is a membership-based organisation representing adult literacy and numeracy practitioners, researchers, program managers, teacher educators and provider organisations. Many of our members have a long history, expertise and involvement in the field.

Please feel free to contact me about any questions about our input.

Yours sincerely,

Keiko Yasukawa

President, NSWALNC
The NSW Adult Literacy and Numeracy Council welcomes the opportunity to provide feedback on the current suite of qualifications derived from the TAE Training Package. As the NSW peak body of adult literacy and numeracy professionals, our feedback will focus primarily on the qualifications relevant for literacy and numeracy (or ‘foundation skills’) practitioners working in VET learning environments, however, as literacy and numeracy are key pedagogical dimensions in any area of learning, we will comment on what needs review in relation to the literacy and numeracy pedagogical knowledge and skills of VET practitioners more generally.

We address the three areas in which PWC has sought feedback as follows:

1. The suitability of the current suite of qualifications for training and assessment that occurs in the range of VET learning environments;

Language, and in many industry areas mathematics, are essential resources/tools for learning. Without language, in all of its multi-modal forms, teachers and trainers cannot provide input, explanations, feedback or corrections. Neither can learners fully demonstrate their learning without language, even in relation to the most ‘hands on’ competencies. Literacy and numeracy – what one ‘does’ with language and mathematics, are therefore just as relevant in all VET learning contexts as they have been recognised to be in other educational contexts.

All school teachers, from primary to upper secondary are now required to attend to their learners’ literacy and numeracy needs, and teacher education programs are now required to demonstrate how their programs teach, give opportunities to practice, and finally assess their pre-service teachers’ performance in addressing the literacy and numeracy needs of their learners and demands of their curriculum area. In NSW the literacy and numeracy knowledge and teaching strategies expected to be demonstrated by pre-service teachers are elaborated upon by the NSW Education Standards Authority (NESA)\(^1\).

The recognition that school students’ literacy demands are increasingly differentiated according to the subject disciplines is well documented in the research literature\(^2\) and reflected in secondary teacher education programs\(^3\). Pre-service secondary teachers learn how to identify and design their students’ development of subject specific literacy


\(^3\) See for example *Literacy and Numeracy across the Curriculum* at the University of Technology Sydney [http://handbook.uts.edu.au/subjects/details/013986.html](http://handbook.uts.edu.au/subjects/details/013986.html); and Language and Literacy in the Classroom at the University of NSW [https://education.arts.unsw.edu.au/media/EDUCFile/EDST2046_Language__Literacy_Learning_in_the_Classroom_S1_2017.pdf](https://education.arts.unsw.edu.au/media/EDUCFile/EDST2046_Language__Literacy_Learning_in_the_Classroom_S1_2017.pdf)
and numeracy so that the students could learn to think, speak and problem solve using the specific tools and discourses of mathematics, history, English and so forth. The specificity of literacy and numeracy needs in different vocational areas and different workplace and organisational contexts has also been recognised in the research literature⁴, and reflected in some programs, including in Australia⁵.

Based on our specialist knowledge of literacy and numeracy pedagogies in the research literature, in teacher education programs and in VET sector practices, we believe that the unit **TAELLN411 Address language, literacy and numeracy skills** is inadequate and misleading in the competency it represents. We outline the reasons below:

1) The unit does not indicate the need for any metalinguistic awareness and ability to perform what is outlined in the unit. In other words, there is no guarantee that a person who is deemed competent in this unit has any knowledge of language, literacy and numeracy that is needed to think, speak and problem solve about the language, literacy and numeracy needs of their learners, even within the specific context of their own industry area.

2) The unit cannot reliably deem a VET practitioner competent in *addressing language, literacy and numeracy skills*; this is a misnomer for what the unit can reasonably aim for.

We would recommend that the unit be renamed: **Work with a language, literacy and numeracy specialist to meet learner and curriculum needs**, and the elements and performance criteria be rewritten to indicate the inter-professional collaboration competency as the basis for the unit.

2. The applicability of the TAE40116 Certificate IV for the various different job roles in the training and education sector, considering both role type and progression pathways;

The TAE40116 Certificate IV is not applicable as a pedagogical qualification in and of itself for VET teaching. The purpose it can usefully serve is to ensure that VET practitioners understand the particular program and assessment framework currently in use in the Australian VET system. This is necessary and important and should not be ignored, particularly since many VET practitioners operate in very small RTOs where there is little support in ensuring regulatory requirements, or are the only trainer within an organisation.

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⁵ McHugh, M. (2004). *Changing the Technology of Teaching: Teaching Literacy as an Embedded Practice Within Industry Training Courses: Lessons from the Course in Applied Vocational Study Skills (CAVSS)*. Department of Education and Training. Note also that the no longer funded Workplace English Language and Literacy (WELL) program provided funding for programs that were directly responsive to the organizational and worker needs in particular workplaces.
For some specialist industry trainers delivering training of a skill set to experienced workers within an organisation, we could concede that the Certificate IV might be adequate. But for practitioners in larger RTOs where the learner groups are generally more diverse, and where the learners are studying in accredited courses at various levels, a better educated teaching workforce is needed. VET learners, while generally older than school students, deserve to be taught by teachers who have the intellectual and practical resources to respond to their learning needs, to know not only the industry/subjects they are teaching but how to teach them, to develop lessons and units of work that lead the particular groups of learners to the requisite outcomes, to give feedback and plan and design fair, reliable and valid assessment tasks, and to conduct themselves professionally taking account of the requirements and expectations of a range of stakeholders.

Australia once had a world class VET system that in recent years has continued to be eroded. While improving the pedagogical qualifications of VET teachers does not solve all of the problems that have damaged the reputation of Australian VET, it is also the case that those who are in a position to take a decisive step to improve the quality of VET teaching have continued to avoid doing so. No one has satisfactorily answered the question of why only VET students do not deserve to be educated by university qualified teachers, and why VET practitioners are not afforded the status of professional educators? Public money has repeatedly been spent to support studies on VET teacher qualifications and it seems none of the findings have been seriously considered or acted upon.

We recommend that the expected outcomes and applicability of the Certificate IV be revised to a more modest set, focussing on the skills and knowledge for working within the VET system and be one component (along with strict guidelines on the relevant industry qualifications and industry experience) of the minimum qualification for VET teaching. Pedagogical preparation for the VET teachers and assessors, especially for those involved in teaching accredited courses and qualifications, should be undertaken through a more comprehensive qualification that addresses not only ‘operational issues and requirements’ but knowledge building about teaching, learning, assessment and learners, and in the case of teaching and assessing students enrolled in literacy and numeracy teaching qualifications, additional knowledge about language and mathematics.

There are many universities that were delivering pre-service and in-service adult education/ VET teacher education courses, and it would be judicious to develop (in

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fact resurrect) clear pathways for VET practitioners who hold the necessary industry qualifications and have experience in industry to complete an AQF 7 or 8 adult education/ VET pedagogical qualification; such a qualification, together with the Certificate IV (either as a separate qualification or embedded within the AQF 7 or 8 qualification) should be deemed the minimum qualification for working in the Australian VET sector. We further recommend that all VET teachers be required to pass at least one supervised teaching practicum before they are deemed qualified.

3. The content of existing TAE training products and the alignment with the skills and knowledge learners will need in the future.

We comment here on the TAE80113 Graduate Diploma in Language, literacy and numeracy practice and TAE80213 Graduate Diploma in Language, literacy and numeracy leadership. We are aware that these, particularly TAE80113, are practically oriented qualifications that are serving well to fill a gap in available specialist qualifications in adult literacy and numeracy.

In reviewing the core units of the TAE80113 and TAE80213, we note the following observations:

1) While practitioners and leaders in adult language, literacy and numeracy clearly need disciplinary knowledge of the cognate fields of applied linguistics and mathematics, this knowledge appears to be assumed, rather than developed explicitly as part of these qualifications.

2) There is little evidence of any theoretical coherence in the units, possibly because the knowledge evidence is expressed in the form of dot points without any rationale or argument.

3) In the current ASQA documentation those who could deliver the TAE80113, are limited to those who hold this qualification.

These observations raise serious concerns about the intellectual integrity of the qualifications. One could satisfy the practical requirements of these qualifications with no robust knowledge of the body of knowledge that is informing the practice they are performing. Statements like ‘describe how aspects of applied linguistics have been used in the design of English language activities to meet the needs of the learner group’ (Knowledge evidence in TAELLN803) or ‘describe at least 2 theories that inform adult numeracy teaching and how they influence methods used in own teaching practices of numeracy, incorporating: mathematics and gender, constructivism, critical numeracy, cultural use of specific mathematics, functionalism’ are baffling to say the least.

We recommend that, consistent with AQF guidelines, those who deliver the TAE80113 and TAE80213 qualifications be required to hold at least an AQF9 level qualification in a cognate field. It is important that those who deliver the qualifications have current and scholarly discipline and pedagogical knowledge of language, literacy and numeracy, and can synthesise findings from new research in a scholarly but accessible manner. The field of applied linguistics and mathematics education are vibrant fields and there is much that the adult education and VET
sectors can learn from what is emerging from those fields. Furthermore, it is important that those who deliver the TAE80213 are themselves research literate and are current in the research literature in the relevant areas. Recent experiences of selected literacy and numeracy practitioners have shown that even well qualified and experienced practitioners find it difficult to sustain currency in the disciplinary field; yet this is vital for anyone in leadership and teacher education roles in adult language, literacy and numeracy.

We also recommend that there is greater clarity in the admissions criteria into the TAE80113 and TAE80213 qualifications. As practically oriented qualifications, it would be important that applicants already have an AQF7 level qualification in a cognate area (linguistics, mathematics, teaching) so they have a robust knowledge base from which they could develop their practice application skills. In the adult language, literacy and numeracy field, ‘teaching’ and/or linguistics and/or mathematics is the relevant ‘industry’ and it is not unreasonable to expect that those admitted to these AQF qualifications have the relevant ‘industry’ qualifications and experience, just like other VET teachers need even to be admitted into the Certificate IV.

Adult language, literacy and numeracy is an important dimension of all VET pedagogies, and short cuts or economising in addressing this pedagogical area presents risks to the quality of VET teaching more broadly. It is also important to recognise that there are demands for literacy and numeracy education that are not directly or immediately related to employment outcomes, but that are equally significant for individuals’ participation in the community. The foundational knowledge for developing pedagogies to support these diverse groups of learners cannot be met by the kinds of outcomes that are possible in training package competencies alone.

It is important that training package developers work in collaboration with higher education providers with expertise in contemporary theories and empirical studies of adult literacy and numeracy to develop pathways that bridge what training packages can offer and what academic qualifications can offer.

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8 See practitioner comments in [https://www.acde.edu.au/?wpdmact=process&did=MjA2LmhvdGxpbms=](https://www.acde.edu.au/?wpdmact=process&did=MjA2LmhvdGxpbms=)