Language, Power and Ruling Relations in Vocational Education and Training

by

Lauris (‘Lauri’) Joy Grace

BA (Hons) Sydney, MPET Deakin

Submitted in fulfilment of the requirements for the degree of

Doctor of Philosophy

Deakin University

November 2005
I certify that the thesis entitled ‘Language, power and ruling relations in Vocational Education and Training’

submitted for the degree of Doctor of Philosophy

is the result of my own work and that where reference is made to the work of others, due acknowledgment is given.

I also certify that any material in the thesis which has been accepted for a degree or diploma by any university or institution is identified in the text.

Full Name       Lauris (‘Lauri’) Joy Grace.

Signed ..................................................................................……………….

Date......................................................................................……………….
Acknowledgments

Over the three and a half years of work involved in researching and writing this thesis many people have helped me. I acknowledge their support and express my gratitude.

First, I thank the people who informed my study. A number of VET practitioners and participants made this research possible by generously sharing their stories in recorded interviews. Others discussed my ideas and sent materials and resources. Their encouragement and feedback helped me stay grounded in the realities of VET practice.

Second, there is my wonderful supervisor, John Henry. I cannot adequately express my respect, gratitude and friendship for John. He gave me space to explore my topic in my own way while helping me stay focused, and he challenged my thinking without imposing his own. It is only now, as the final thesis emerges from the mountain of paper, that I begin to understand how indebted I am to John’s guidance.

Third, my partner, professional colleague and critical friend John Grace who, having nurtured me through a Masters degree never hesitated in encouraging me to undertake a PhD even though he knew what he was in for… In this study, as in so many things, John’s belief in me when I doubted myself helped me achieve goals that I might otherwise have thought were out of reach.

I thank the many people whose paths crossed mine with positive consequences for my research. Researchers who took an interest in my study, supported my presentations, and passed on resources. I am especially grateful to the reviewers whose generous feedback prompted me to revisit my data and the literature to develop my ideas and arguments.

Finally, I acknowledge the support provided by Deakin University, which not only made my research possible but also enabled me to present at conferences across Australia.

Perth, November 2005
Contents Page

CANDIDATE’S DECLARATION ............................................................................................................................ I

ACKNOWLEDGMENTS ................................................................................................................................... II

LIST OF FIGURES ........................................................................................................................................ X

SUMMARY ................................................................................................................................................... 1

INTRODUCTION .......................................................................................................................................... 1

CHAPTER ONE: THE AUSTRALIAN VET SECTOR: AN INSTITUTIONAL FORM ............................... 6

INTRODUCTION .......................................................................................................................................... 6

THE ‘FULLY INTEGRATED NATIONAL VET SYSTEM’ .................................................................................... 7

From ‘an afterthought’ to ‘a world leader’ ...................................................................................................... 8

Nationally consistent content: Competency Based Training Packages ..................................................... 10

Nationally consistent qualification levels: The Australian Qualifications Framework ............................ 11

Nationally consistent delivery and assessment: The Australian Quality Training Framework and
Registered Training Organisations ................................................................................................................ 12

VET governance arrangements .................................................................................................................. 14

VET: A ‘TOOL OF ADMINISTRATIVE RATHER THAN INSTRUCTIONAL REFORM’? ...................... 17

VET policy development: Research and consultation or ‘a culture of secrecy’? ....................................... 17

Competency based training: A ‘thicket of opinion’ ................................................................................. 19

The language of Training Packages: ‘not English as we know it’ ............................................................ 21

TERMINOLOGY USED IN THIS THESIS ..................................................................................................... 28

‘Teachers’, ‘trainers’ or ‘VET practitioners’? ........................................................................................... 28
CHAPTER FIVE: UNPACKING TRAINING PACKAGES: A GENEROUS DESCRIPTION OF VET PRACTICE ....................................................................................................................................... 83

INTRODUCTION ................................................................................................................................................... 83

THE ACCOUNT BEGINS ........................................................................................................................................... 83

Texts that require a different kind of reading ............................................................................................. 85

CHARACTERISTICS OF TRAINING PACKAGE LANGUAGE ..................................................................................... 89

HOW DO VET PARTICIPANTS ENCOUNTER TRAINING PACKAGE LANGUAGE? .......................................................... 93

The argument presented for giving units of competency ............................................................................ 94

The argument presented for not giving units of competency ........................................................................ 96

Recognition of Prior Learning ................................................................................................................... 98

Inducting novice VET practitioners ........................................................................................................... 99

THE IMPACT OF LANGUAGE ON PARTICIPANTS ................................................................................................... 103

VET PRACTITIONERS AS TRAINING PACKAGE INTERPRETERS ............................................................................. 106

A TANGIBLE SENSE OF PUZZLEMENT ........................................................................................................ 107

CONCLUSION ....................................................................................................................................................... 109

CHAPTER SIX: ‘THAT’S JUST NOT HOW I SPEAK’: ORGANISING WORKPLACE PRACTICE THROUGH NATIONAL COMPETENCY TEXTS ................................................................................................................. 111

INTRODUCTION ....................................................................................................................................................... 111

TWO VIEWS OF WORKPLACE LEARNING AND ASSESSMENT .................................................................................... 112

Learning and assessment: A ‘pathway to a better job’ .................................................................................... 112

Learning and assessment: Being constructed as a competent worker ......................................................... 113

AUTHORISED TEXTS THAT STAND IN FOR LOCAL WORKPLACE PRACTICE ............................................................ 117
<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recognising the skills and knowledge used in everyday activities</td>
<td>120</td>
</tr>
<tr>
<td>Making the connections between everyday skills and units of competency</td>
<td>122</td>
</tr>
<tr>
<td>The role of the VET practitioner</td>
<td>124</td>
</tr>
<tr>
<td>WHAT MEANINGS ARE AUTHORITATIVE AND WHO HAS POWER?</td>
<td>126</td>
</tr>
<tr>
<td>Shifting the policing of and legitimacy for local knowledge</td>
<td>129</td>
</tr>
<tr>
<td>DRAWING THE ARGUMENT TOGETHER</td>
<td>132</td>
</tr>
<tr>
<td>HOW DO TRAINING PACKAGES BECOME AUTHORISED TEXTS?</td>
<td>133</td>
</tr>
<tr>
<td>The role of industry in Training Package development</td>
<td>136</td>
</tr>
<tr>
<td>The role of government in Training Package development</td>
<td>138</td>
</tr>
<tr>
<td>Training Packages: industry benchmarks or government regulatory texts?</td>
<td>139</td>
</tr>
<tr>
<td>The implications for language</td>
<td>141</td>
</tr>
<tr>
<td>ROOM FOR RESISTANCE</td>
<td>145</td>
</tr>
<tr>
<td>CONCLUSION</td>
<td>147</td>
</tr>
</tbody>
</table>

CHAPTER SEVEN: ‘YOU’RE NEVER QUITE SURE IF YOU’RE RIGHT’: ORGANISING LEARNING AND ASSESSMENT PRACTICE THROUGH NATIONAL QUALITY TEXTS ....149

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>INTRODUCTION</td>
<td>149</td>
</tr>
<tr>
<td>Competency texts and a quality framework in a ‘symbiotic relationship’</td>
<td>150</td>
</tr>
<tr>
<td>‘You actually don’t want to give somebody the Training Package’</td>
<td>152</td>
</tr>
<tr>
<td>‘Well, they have to have it in there somewhere’</td>
<td>154</td>
</tr>
<tr>
<td>Different readings of ruling texts</td>
<td>156</td>
</tr>
<tr>
<td>AN AUTHORISED TEXT THAT STANDS IN FOR AND ORGANISES LEARNING AND ASSESSMENT PRACTICE</td>
<td>157</td>
</tr>
<tr>
<td>‘Bits of paper’ that reshape local practice</td>
<td>159</td>
</tr>
<tr>
<td>List of Figures</td>
<td>Page</td>
</tr>
<tr>
<td>--------------------------------------------------------------------------------</td>
<td>------</td>
</tr>
<tr>
<td><strong>FIGURE 1:</strong> TRAINING PACKAGE LANGUAGE AND WORKPLACE VERNACULAR: EXTRACT</td>
<td>23</td>
</tr>
<tr>
<td>from Unit CUFCAM01A ‘SET UP AND OPERATE A BASIC VIDEO CAMERA’</td>
<td></td>
</tr>
<tr>
<td><strong>FIGURE 2:</strong> TRAINING PACKAGE LANGUAGE AND WORKPLACE VERNACULAR: EXTRACT</td>
<td>60</td>
</tr>
<tr>
<td>from Unit TDTD197B ‘SHIFT MATERIALS SAFELY USING MANUAL HANDLING METHODS’</td>
<td></td>
</tr>
<tr>
<td><strong>FIGURE 3:</strong> TRAINING PACKAGE LANGUAGE AND WORKPLACE VERNACULAR: EXTRACT</td>
<td>82</td>
</tr>
<tr>
<td>from Unit BSBFLM509A ‘PROMOTE CONTINUOUS IMPROVEMENT’</td>
<td></td>
</tr>
<tr>
<td><strong>FIGURE 4:</strong> TRAINING PACKAGE LANGUAGE AND WORKPLACE VERNACULAR: EXTRACT</td>
<td>110</td>
</tr>
<tr>
<td>from Unit FNBGEN04A ‘EVALUATE RISK FOR NEW BUSINESS’</td>
<td></td>
</tr>
<tr>
<td><strong>FIGURE 5:</strong> TRAINING PACKAGE DEVELOPMENT PROCESS</td>
<td>135</td>
</tr>
<tr>
<td><strong>FIGURE 6:</strong> TRAINING PACKAGE LANGUAGE AND WORKPLACE VERNACULAR: EXTRACT</td>
<td>182</td>
</tr>
<tr>
<td>from Unit BSZ406A ‘PLAN A SERIES OF TRAINING SESSIONS’</td>
<td></td>
</tr>
<tr>
<td><strong>FIGURE 7:</strong> TRAINING PACKAGE LANGUAGE AND WORKPLACE VERNACULAR: EXTRACT</td>
<td>215</td>
</tr>
<tr>
<td>from Unit PUAFIR203A ‘RESPOND TO URBAN FIRE’</td>
<td></td>
</tr>
</tbody>
</table>
Summary

This thesis uses institutional ethnography to explore the text-based regulatory framework of the Australian Vocational Education and Training (VET) sector. Training Packages are national competency standards used to assess local workplace practice. The Australian Quality Training Framework (AQTF) is a national compliance framework used to audit local learning and assessment practice. These texts operate in a 'symbiotic relationship' to achieve a policy goal of national consistency.

The researcher explicates the social relations of VET starting from her disquiet as a practitioner. The thesis argues that Training Packages and the AQTF socially organise the content and delivery of local learning and assessment activities. VET practitioners struggle to use these texts to support good practice, and their hidden work maintains an unstable VET system. Yet the extralocal mode of ruling offers no room to challenge VET policy.

The thesis explicates three themes. Interview data is used to explore the contrast between the institutional language of Training Packages and the vernacular of workplaces in which these texts are activated. Many practitioners and participants simply do not understand Training Package competency standards. Using these texts to judge employee performance shifts the policing of workplace practice from local sites to external VET authorities.

A second theme emerges as the analysis explores why VET practitioners use this excluding language in their work with participants. Interview data reveals that local training organisations achieve different readings as they engage with ruling VET texts. Some organisations use the national texts as broad frameworks, allowing practitioners to create spaces for meaningful learning. Other organisations adopt a narrow and rule-bound reading of national texts, displacing practitioners’ authority over their own practice.

A third theme is explored through examination of a sequence of VET texts. The review and redevelopment of the mandatory qualifications for VET practitioners identified the
language of the competency standards as a significant accessibility issue. These concerns were reshaped and subsumed in an official response that established the use of this language as a compulsory assessable requirement and a language and literacy benchmark.

The thesis presents a new understanding of VET as a regulatory framework established through multiple levels of ruling texts that connect local sites to national government agendas. While some individual practitioners are able to navigate through this system, there is an urgent need for practitioners as a profession to challenge national hegemony.
Introduction

This PhD research project set out to explore the contrast between the complex language of national Training Packages and the vernacular of local workplaces in which these texts operate. Training Packages are competency based assessment standards that underpin learning and assessment practice in the Australian Vocational Education and Training (VET) sector. From the outset this project was firmly grounded in my own sense of disquiet and disjuncture as a VET practitioner with over 10 years experience developing, delivering and evaluating learning and assessment in workplaces, vocational colleges, and distance programs. In my experience people who are confronted with Training Packages struggle to understand the language in which these texts are written. Many describe their experiences of this language in terms of identity, power and exclusion; they relate past experiences of marginalisation in schooling and describe current feelings of fear and inadequacy. Yet established VET approaches to language are generally silent on issues of power and exclusion, focusing instead on the (presumed deficient) language and literacy skills of individuals and groups who are excluded by these texts.

From the starting point of my disquiet, my research project used institutional ethnography to explicate what is happening when VET practitioners engage with Training Packages in local workplace sites. From its initial focus on the language of Training Packages my study brings into view how these and other VET texts operate individually and in combination to organise and reshape local practice and align it to national government economic agendas rather than to local needs.

The Australian VET sector provides the context for this study, and institutional ethnography provides its conceptual and methodological framework. The complexity of VET, its political and economic environment, and its use of a particular institutional language form combine to make this context ‘little understood’, particularly by people working in other sectors of education (Smith, E. & Keating 2003, p.2). Institutional ethnography has been described as ‘an emergent mode of inquiry’, and institutional ethnographers are warned that an account of their methodology may need to provide a
more comprehensive explanation than would be necessary for a more conventional
research approach (Campbell & Gregor 2002, p.55). Writing an account of a research
project that used an ‘emergent mode of enquiry’ to research a context that is ‘little
understood’ presented its own challenges. To write this thesis for readers who were
familiar with both VET and institutional ethnography would be to address a very small
audience indeed. Instead, the thesis will begin with two chapters that explain the context
and the conceptual framework, before articulating my research problematic and moving
on to an account of the study and its findings.

This structure may differ from that more commonly adopted in PhD theses, but I believe
it is well suited to this study. Catherine Down (2003, p.18) argued that VET practitioners
have knowledge of and insight into the impact of national policy on their practice, and
she described practitioner knowledge as part of the ‘collective wisdom’ of VET. As a
practitioner, my view on the VET sector is informed by knowledge and insight
developed over a career at the front line of what has come to be known as VET ‘reform’.
Readers who are familiar with VET from a higher education perspective may find that
my description of the context for this study differs from descriptions they have
encountered in policy texts and other scholarly research. My description of institutional
ethnography is intended to do more than provide an account of my study as a PhD
research project. Institutional ethnography is not well established in Australian VET
research, although perhaps I should say not yet well established. I have found
institutional ethnography to be an extremely generative approach to explicating
practitioner disquiet that arises from the local contradictions and tensions inherent in the
national VET system. The research literature surrounding VET suggests that VET
practitioners are using higher degree research programs to explore their own practice in
ways that are not generally available within the VET sector itself (Brown & Hodges
2003; Kell 2001). The description of my research project presented in this thesis has
already provided, and will continue to provide, the basis for published papers that seek
to make institutional ethnography more widely known as an approach for VET
practitioner research.
My use of the research literature reflects the status of this project as an institutional ethnography study. Rather than presenting a formal ‘literature review’ as might be found in a conventional PhD thesis, I have used the literature to explore the research that already exists, to frame what needs to be known and establish my own position in this project (Campbell & Gregor 2002, pp.50-54). The literature is drawn on throughout this thesis, but particularly in Chapters 1 and 2, which frame the study.

The thesis opens with a description of the national VET sector as an institutional form. Chapter 1 will outline governance arrangements that created a national VET sector from eight separate state and territory systems. These governance arrangements align VET policy to national economic and labour market policies, and they establish national government priorities such as the pursuit of national consistency in vocational education and training. Chapter 1 will also introduce three aspects of VET policy and practice that have been subject to critique. It will raise the proposition that VET policy development is based on government agendas rather than consultation, it will briefly touch on the debate about whether competency based training is a strategy for improving educational practice or a mechanism of control, and it will introduce questions about the language of Training Packages that are at the heart of this study.

Chapter 2 will explain how and why I selected institutional ethnography as the conceptual and methodological framework for this study. Institutional ethnography argues that power in contemporary societies is pervasively structured through texts that actively organise and coordinate local activities. An institutional ethnography study identifies an area of local practice and asks ‘what is happening here?’, explicating how organisations take up and activate ruling concepts as they engage with and implement ruling texts (Campbell 2003). Chapter 3 will describe how my initial exploration of local learning and assessment practices in VET brought into view the ‘extralocal’ processes that organise what is happening in local sites (Smith, D.E. 1987, p.3). From the starting point of my disquiet about the language of Training Packages a problematic emerged that allowed me to explicate the role of the VET regulatory framework and its impact on local practice. Chapter 4 will provide a detailed account of the research methods I used
in generating and working with interview data that provided entry into local sites, and
examination of texts that revealed the ruling relations that organise those local sites.

Chapter 5 presents the interview data from my study in the form of a ‘generous’
description (Smith, D.E. 1987, pp.165-167) of the work VET practitioners do as they
‘unpack’ Training Packages (DET Qld 2003, p.14) and use them as the basis for
workplace learning or assessment programs. This generous description goes beyond the
boundaries of what is recognised as work in official VET accounts of unpacking
Training Packages, and it brings into view some of the work processes that practitioners
actually follow and the skills, knowledge and judgement that they use. This generous
account will combine a composite description drawn from the interview data but
presented in my own words, with extracts from the interview data where informants
spoke directly about their own encounters with Training Packages. When informants in
this study talked about their experiences with Training Packages, both the stories they
told and the words they used directly challenged and disrupted comfortable assumptions
that the existing regulatory framework of VET supports quality education and training.
The account of practice presented in Chapter 5 sets up a tangible sense of puzzlement
and frustration expressed by professionals constrained to adopt approaches that they
know do not represent good educational practice, but over which they have little control.

The generous account of work will be followed by three chapters of discussion and
analysis, each of which explicates a particular theme or issue of practice that emerged in
my study. Chapter 6 uses a combination of interview data and examination of VET texts
to explore the impact that the language of Training Packages has when these texts are
used to support workplace learning and assessment activities. Explicating this theme
brings into view how local workplace practice is socially organised and shaped by the
use of external Training Package standards as the basis for making judgements of
competence. Chapter 7 also uses interview data and VET texts to investigate why VET
practitioners expose participants to uncontextualised Training Package language. The
analysis reveals a number of strong resonances between the operation of Training
Packages and the operation of the compliance standards of the Australian Quality
Training Framework (AQTF). The discussion argues that local learning and assessment
practice is shaped by the AQTF in much the same way that local workplace practice is shaped by Training Packages. Chapter 8 uses a sequence of five VET texts to explore VET practitioners’ attempts to challenge the use of this language, and the inability of formal VET consultation and decision making processes to respond.

In Chapter 9 the three themes that are explored in Chapters 6, 7 and 8 will be brought together in a new description of the ruling relations of the Australian VET sector. The analysis will argue that national consistency is a hegemonic discourse pursued through multiple levels of increasingly complex ruling texts that act individually and together to organise local practice and align it to policy goals defined by national government agendas. The texts that make up the ruling relations of VET shift authority from state governments to the national government and from local sites to external VET authorities. In completing the circle and returning to the starting point for this study, the discussion will argue that the complex institutional language of VET texts is such that organisations and individuals whose practice is subject to judgement against the texts seek out authorised readings. The regulatory power of the texts is such that these authorised readings are provided by those who occupy positions of power defined within the texts themselves. Combined, the institutional language and regulatory power of the texts establish the interpretation and unpacking of texts such as Training Packages and the AQTF as a key moment in the exercise of power within VET.

The thesis draws to a close by briefly restating the study’s approach to language, power and ruling relations. This approach constructs issues of language and power in VET through an understanding that makes visible how ruling texts constrain local practice and work to render education professionals as functionaries. It defines the relationship between language and power in a way that is powerful for VET practitioners and can be generalised to other institutional contexts. The new understanding underpins a proposition that there is an urgent need for VET practitioners to overcome professional divisions and organise to resist current developments that could see hegemonic social relations imposed through regulatory requirements that are increasingly complex, restrictive and controlled by national government authorities.
Chapter One: The Australian VET sector: An institutional form

Introduction

When I embarked on this research project I set out to explore the way language is used in Training Packages, and the impact this language has when Training Packages are used to support workplace learning and assessment programs. At the outset this appeared to be a fairly straightforward research topic; certainly many of my colleagues and informants responded to it as an obvious issue for study. But as my research proceeded I quickly uncovered levels of complexity that threatened to engulf a starting point that now seemed, in some ways, deceptively simple. While later chapters of this thesis will explore some of these levels of complexity, my goal in this opening chapter is to set the scene; to provide sufficient background about the Vocational Education and Training (VET) sector to enable the reader to understand my research project.

Even this task immediately introduces a level of complexity, as my focus on the language of Training Packages involves explaining what a Training Package is. One VET text currently in use defines a Training Package as ‘an integrated set of nationally endorsed competency standards, assessment guidelines and AQF qualifications for a specific industry, industry sector or enterprise’ (ANTA 2005f, p.18). To explain Training Packages in my own words I might say that a Training Package is a set of government approved performance standards used by assessors to decide whether individuals are competent and eligible to receive formal VET qualifications. Both of these definitions, however, are sadly inadequate unless accompanied by a fuller explanation of government approval / endorsement arrangements, assessment processes, and VET / AQF qualifications. My dilemma is that, while my research topic is obvious to colleagues who work with Training Packages, it is not easily explained to others.

Part of the problem is that Training Packages are many things. As well as being nationally endorsed assessment standards, they are also an integral component of the National Training Framework (WADoT 2002a, p.7). To explain Training Packages in a way that renders my research topic meaningful, I need to place them within the context
of the VET sector and the National Training Framework as a whole. Mark Casey (2002, p.5) argued that ‘[t]rying to understand the Vocational Education and Training (VET) sector and training packages is not for the faint hearted. For the uninitiated it can be like walking through a thick treacle of acronyms, state systems, federal systems and a bewildering array of organisations’. The scale and complexity of the VET sector, and an ongoing history of policy and structural change, makes VET quite different to other sectors of education and difficult to come to grips with (Smith, E. & Keating 2003, p.2).

This chapter will briefly outline some of the key elements of VET, to provide a context for the study and for the analysis that will be presented later in this thesis. The discussion will be presented in three sections. In the first section I will introduce those aspects of the VET system that are of most interest to this study, and this part of the discussion will be presented largely without critical commentary. The intent here is not to gloss over the contradictions and tensions that are inherent within VET, but rather to present some of the key concepts and structures of the Australian VET sector in a way that makes them accessible to readers who are not familiar with them. The second part of the discussion will draw on the wider literature to highlight some of the critiques that have been made of VET, and to introduce questions about language that are explored in this study. The third part of the discussion will briefly explain some of my own language use in this thesis. Overall, the purpose of this chapter is to lay foundations for later chapters in which a number of themes introduced here will be further elaborated and explored.

The ‘fully integrated national VET system’

The Australian education system is comprised of four sectors: Vocational Education and Training (VET), Schools, Higher Education, and Adult and Community Education (Gibb 2003). Vocational education and training can be broadly defined as post-compulsory education and training which provides occupational or work-related knowledge and skills (ANTA 2003b, p.2; Knight & Nestor 2000, p.42). Within the Australian federal system, the division of legislative powers between commonwealth and state governments is formally set out in the Australian constitution (Smith, E. & Keating
Under this division of powers, the authority to make laws in relation to education is a state, not a commonwealth responsibility. Despite this, national, state and territory governments have introduced a succession of formal agreements that established a single VET sector largely driven by national government agendas.

While the historical roots of VET lie in technical education, which has a documented history beginning in the 1800s (Murray-Smith 1965, p.172), the VET sector as an institutional form or ‘functional complex’ that can be recognised, named and talked about, has existed for little more than two decades.

**From ‘an afterthought’ to ‘a world leader’**

Prior to the establishment of a single VET sector, non-university training for employment fell into three broad areas. Trade training was provided through the apprenticeship system and subject to state government regulation through industrial relations arrangements; technical education was provided through technical schools which were regulated through state based education authorities; workplace staff training was provided within individual businesses and was largely unregulated (Smith, E. & Keating 2003, pp.6-13).

For approximately 100 years, from the establishment of the Victorian School of Mines in 1871 until the establishment of the Australian Committee on Technical and Further Education in 1973, government interest in technical education waxed and waned. Periods of war and economic change typically saw increased state government commitment to technical education but were interspersed with periods of decline (Fooks 1994, p.38; Murray-Smith 1965; Smith, E. & Keating 2003, pp.6-7). Technical education in this period was variously described as a ‘Cinderella’, ‘an afterthought’, and ‘the etcetera part of education’ (Fooks 1994, pp.40-43); it lacked both an identity and a charter, and was ‘consistently under-valued and under-resourced’ (Goozee 2001, p.8). In

---

1 In general usage the commonwealth government is also referred to variously as the federal government, the Australian government and the national government. Throughout this thesis I use ‘national’ government, except where specifically referring to commonwealth legislation or constitutional powers.
1972 the national Labor government was elected with an extensive platform of educational policies that did not include a policy for technical education (Fooks 1994, p.37). In the mid 1970s the status of technical education (which came to be known as vocational education and training) changed dramatically in response to world economic developments, as the national government began taking a lead role in establishing what was later described as the ‘fully integrated national VET system’ (Mitchell & Young 2001, p.5) and ‘a world leader’ (DEST 2005b, p.4).

A heavy reliance on commodity exports made the Australian economy vulnerable to changing world economic conditions in the 1970s (Smith, E. & Keating 2003, pp.16-18). The impact of international developments saw the Australian economy move from almost full employment to high levels of unemployment and inflation, with two major periods of recession and a ‘crisis’ in the balance of payments and national debt (ACTU/TDC 1987; Smith, E. & Keating 2003, p.18). In response to these economic conditions the national government introduced a range of economic and industrial relations policies, with increased emphasis on education and training (Smith, E. & Keating 2003, p.32). While education remains a state government responsibility under the constitution, governance arrangements agreed between national, state and territory governments have seen the progressive emergence of the National Training Framework, establishing the VET sector as a recognisable sector of education.

Drawing together trade, technical and workplace training, the national VET sector is ‘broad and diverse’; it encompasses a wide range of industry and skill areas, organisation types, learning environments, and it serves a diverse student population (NCVER 2004, p.2). Within this diversity, and replacing eight different state and territory technical education regulatory systems, the National Training Framework was structured to deliver nationally consistent program content, qualification levels, and delivery and assessment standards. The following section will provide a brief overview of the key elements of the NTF most relevant to this study, beginning with Training Packages.
Under the NTF competency based training and assessment, based on national competency standards, is the only curriculum approach used in activities leading to formal VET qualifications (AQFAB 2002, pp.6-7; NAWT 2001, p.2). Rather than being specifically developed to meet the needs of a particular industry in a particular location, the competency standards used in VET define performance for an entire industry on a national basis. They are developed with national government funding and endorsed by national VET authorities (Smith, E. & Keating 2003, p.42).

Since 1996, national competency standards have been progressively incorporated into industry Training Packages to create something broadly akin to curriculum guideline documents for ‘consistent and nationally recognised’ VET qualifications (DET Qld 2003, p.5). Training Packages are not, as the name might suggest, materials to support training and learning. They are sets of ‘assessable outcomes’ (ANTA 2002, p.2), or ‘nationally endorsed standards and qualifications for assessing and recognising people’s skills’ (ANTA 2001b). While Training Packages focus on assessment, they underpin teaching and learning in the sense that each learning program must be designed to address the assessment requirements specified in the relevant Training Package standard (ANTA 2005f, p.11).

All Training Packages have three ‘endorsed’ components, a designation that reflects their status as texts that have been approved by national VET authorities. These three components are the competency standards, the assessment guidelines and the qualifications framework. The use of these components is mandatory, and is governed by VET regulations. Competency standards define the standard of performance against which individuals will be assessed. Competency standards are made up of ‘units of competency’, each of which represents part of a job role that ‘when applied in a work situation, can logically stand alone’ (ANTA 2004b, pt 2, p.8). Assessment guidelines outline the requirements that assessors must meet in conducting assessments against the units of competency; they might specify, for example, that assessments must be undertaken in a real or simulated workplace as distinct from a classroom. The qualifications framework lists the units of competency that make up each qualification.
available under the Training Package, and indicate which units are ‘core’ (mandatory) and which ‘elective’. Once a Training Package has been endorsed, it provides an assessment and qualification framework for an entire industry sector. In December 2004 there were eighty one national Training Packages available (DEST 2005b, p.20), offering nationally recognised qualifications for industries as diverse as the meat industry, the beauty industry, the entertainment industry and the local government industry. Training Packages are publicly available on the Internet through the National Training Information Service database (DEST n.d.a).

In addition to the three endorsed components, some Training Packages also include ‘non-endorsed’ components, which may include learning, assessment or other support materials. These materials are developed at national level with government funding, but there is no requirement for training organisations to use them. Many training organisations prefer to develop their own delivery and assessment materials. Training Packages were designed to make training nationally consistent and widely accessible (Smith, E. & Keating 2003, p.148), but they do more. Kaye Schofield and Rod McDonald (2004, p.8) stated that ‘Training Packages reflect some of the most fundamental principles and policies on which the national VET system has been built (the ‘rules of the VET game’). Training Packages are ‘intimately intertwined’ with other parts of the VET framework, and operate ‘in a symbiotic relationship’ with the Australian Qualifications Framework and the Australian Quality Training Framework (Schofield & McDonald 2004, p.8).

**Nationally consistent qualification levels: The Australian Qualifications Framework**

The Australian Qualifications Framework (AQF) provides a national framework for all post-compulsory education and training qualifications available in the Australian education system, from senior secondary certificates of education to doctoral degrees (AQFAB 2002, p.1). An explicit goal of the AQF is to provide for national consistency or ‘common ground’ in qualifications at each level across the three education sectors (AQFAB 2002, p.2). The framework defines each qualification level in terms of its
distinguishing features and the learning outcomes or competencies to be achieved. It also provides guidelines on the pathways to each qualification, the responsibility for assessment, and the authority for and nature of the certification issued. Education and training organisations in the VET sector are authorised to deliver AQF Certificates I to IV, Diplomas and Advanced Diplomas, Vocational Graduate Certificates and Vocational Graduate Diplomas (AQFAB 2005). There is some overlap between education sectors, with some schools offering units of competency up to Certificate IV level, some VET institutions offering Graduate Certificates, and some universities offering Diploma qualifications (AQFAB 2002, p.1).

**Nationally consistent delivery and assessment: The Australian Quality Training Framework and Registered Training Organisations**

Before an organisation can conduct learning and assessment activities leading to national VET qualifications, it must become a Registered Training Organisation (RTO) under the provisions of the Australian Quality Training Framework (KPA Consulting 2004, p.7). The AQTF is a set of compliance standards developed to ‘provide the basis for a nationally consistent, high quality vocational education and training (VET) system’ (ANTA 2005f, p.1). The AQTF incorporates standards for RTOs and standards for the state and territory authorities responsible for registering and monitoring RTOs.

A variety of organisations become RTOs for the purpose of offering VET programs (Chappell 2003; Down 2003). A common distinction made in the literature is between publicly funded and private RTOs (Smith, E. & Keating 2003, p.6). Each state and territory government operates a system of public RTOs called Technical and Further Education (TAFE, or even ‘Tafe’) colleges or institutes. TAFE colleges typically draw the bulk of their funding from a combination of national and state government sources; some of this funding is allocated by direct grants while an increasing proportion is allocated through tendering processes in which TAFE colleges compete with other RTOs (Smith, E. & Keating 2003, p.47). In addition to their publicly funded programs, TAFE colleges typically offer a smaller range of programs through commercial or ‘fee-for-service’ arrangements.
Private RTOs provide training and assessment as a core business activity. They include commercial training providers, private vocational colleges, and individual consultants. Private RTOs typically draw the bulk of their funding from commercial or fee-for-service arrangements, but some also compete for government funds allocated through competitive tender processes or structured apprenticeship and traineeship programs. Private RTOs also include enterprises whose core business is something other than training, but which take on RTO status for the specific purpose of offering formal VET qualifications to their own employees through in-house training aligned to Training Packages (Smith, E. & Keating 2003, p.74). These organisations are known as ‘enterprise RTOs’ and they typically fund their activities from within their own resources, but are also able to compete for a limited range of government funding programs including those for apprenticeships and traineeships.

Other organisations that register as RTOs include Adult and Community Education providers, universities, and some industry organisations that include training within the range of services they provide to their members. Funding arrangements for these organisation types vary, but can include some combination of public and commercial funding. Schools increasingly offer units of competency through what is known as ‘VET in Schools’ programs, although these generally operate through formal partnerships with established VET RTOs, rather than by a school taking on RTO status itself. VET in Schools programs generally receive public funding.

Training Packages, the Australian Qualifications Framework, and the Australian Quality Training Framework are national texts that apply across the full range of contexts and participants within VET. All training organisations that issue formal VET qualifications, whether funded from public or private sources, are subject to this regulatory framework. While these elements of the VET regulatory framework are visible in local sites, they operate within, and draw their authority from, broader governance arrangements that have created a single national VET system from eight separate state and territory systems. The next section will briefly overview these governance arrangements.
VET governance arrangements

The governance arrangements of the national VET sector have been described as ‘inherently unstable’ and ‘overly complex’ (Smith, E. & Keating 2003, p.51). Since 1992 governance has been achieved and maintained through a combination of government funding agreements and legislation, and it has been characterised by a complex arrangement of government departments, statutory authorities, committees and advisory councils (ANTA 2005m). This discussion will not attempt to present a detailed description of these arrangements, as such a task is beyond the scope of this study. The primary relevance here is not the detailed administrative arrangements themselves but the relationships, assumptions and thinking that underpin them.

From 1992 to June 2005 national and state governments documented the agreed arrangements and directions for the national VET sector in a multilateral agreement called the ANTA Agreement (Smith, E. & Keating 2003, p.50). First signed in 1992 and thereafter reviewed on an ongoing basis, the ANTA Agreement placed funding arrangements within a wider document that also defined objectives, planning and accountability arrangements for the national VET system, and outlined the roles and responsibilities of national, state and territory governments (ANTA 2005b, 2005h). The agreed national arrangements were given legislative effect through parallel legislation enacted by commonwealth, state and territory governments (DEST 2005b, pp.4-5).

The ANTA Agreement and related legislation established the Australian National Training Authority (ANTA) as an Australian Government statutory authority empowered to advise on VET policy issues, and to administer the VET sector and national government funding (ANTA 2005l; Smith, E. & Keating 2003, p.32). ANTA provided advice to the ANTA Ministerial Council (MINCO), a council of national, state and territory ministers for vocational education and training (ANTA 2005c). MINCO determined policy, objectives and priorities for the national VET system; it also nominated industry representatives for positions on the ANTA Board (ANTA 2005l). Other organisations and groups that contributed to the national VET system at the level of national policy and administration included: the National Training Quality Council (NTQC); the Department of Education, Science and Training (DEST); the Australian
Indigenous Training Advisory Council (AITAC); The Australian Disability Training Advisory Council (ADTAC); ten Industry Skills Councils (ISCs); and the ANTA CEOs Committee (ANTA 2005m). In addition, each state and territory has its own minister, government department, and local authorities known as state training authorities (STAs) that are responsible for VET policy and administration at that level. Small wonder that Mark Casey (2002, p.5) complained of ‘a thick treacle of acronyms, state systems, federal systems and a bewildering array of organisations’.

As this outline of VET governance arrangements draws to a close, the reader may have noticed my use of past tense throughout. The arrangements that were in place from 1992 to June 2005 are currently in a period of transition following the announcement by the national government of new arrangements that are being progressively implemented between July 2005 and January 2006. ANTA has been abolished and its responsibilities have been transferred to the Commonwealth Department of Education, Science and Training (DEST), and MINCO is to be replaced by a new Ministerial Council on Vocational Education (DEST 2005b, p.1 & p.8).

While the detailed structure of the VET governance arrangements is changing, the underpinning assumptions and thinking largely remain. The new governance arrangements are to be achieved through a combination of funding agreements and legislation (DEST 2005b pp. VI-VII). The governance arrangements in place from 1992 until 2005 established a national VET system which had agreed objectives and consistent strategies, and which focused on providing training to enhance employment outcomes and meet industry needs (Smith, E. & Keating 2003, pp.49-50). The new arrangements announced by the national government will continue this emphasis on national goals and strategies, and will also maintain the focus on providing training for employment and industry needs (DEST 2005b pp. VI-VII).

The changes announced by the national government were accompanied by rhetoric about streamlining, simplifying and ‘removing the bureaucracy and red tape’ (DEST 2005b, pp.VI-VII). The Department of Education, Science and Training will continue, as will the Industry Skills Councils. The various committees that advised ANTA will be replaced by a National Governance and Accountability Framework that will include a
The Australian VET sector: An institutional form

National Senior Officials Committee, a National Industry Advisory Group, a National Industry Roundtable, and a national Action Group model (DEST 2005b, pp.8-13). Only time will tell whether the new arrangements are more accessible to the uninitiated than the ‘overly complex’ and ‘bewildering array’ of organisations they are replacing.

The public rhetoric of VET asserts that that the system is industry led (ANTA 2003b, p.3). The ANTA Board was largely comprised of people from business and industry (ANTA 2005l), and Industry Skills Councils advise on skill needs and have input to training products and services including the development of Training Packages (ANTA 2005a). Yet an examination of the structure, membership and roles within the national framework reveals the prominence of government interests. MINCO, situated at the top of the VET organisational chart, was comprised exclusively of national, state and territory ministers of VET and was chaired by the national government minister who held two votes and a casting vote (ANTA 2005c). The ANTA CEOs Committee, which considered proposals before they were put to the ANTA Board and MINCO, was comprised of the chief executive officers of state and territory training authorities (ANTA 2005j). National, state and territory VET authorities were also represented on each of the national advisory committees: the National Training Quality Council, the Australian Indigenous Training Advisory Council and the Australian Disability Training Advisory Council (ANTA 2005d, 2005e, 2005g).

These governance arrangements established a National Training Framework in which all learning and assessment aligned to national VET qualifications, whether funded from public or private sources, was subject to government regulation in relation to content, delivery and assessment practices, and qualification levels. A key theme throughout the evolution of the VET sector has been the pursuit of national consistency. From 1996 to 2005 this was pursued through the regulatory system of the NTF comprised of Training Packages, the Australian Qualifications Framework, and the Australian Quality Training Framework. With the governance changes in 2005 the NTF is to be replaced by the National Skills Framework which, while potentially adding some additional elements, appears to leave Training Packages, the AQTF and the AQF unchanged (DEST 2005a).
This overview of the national VET system has been necessarily brief; a ‘word sketch’ that deliberately leaves out at least as much as it includes. My objective in presenting this overview is to introduce the reader to those elements of the national VET system that most directly relate to the issues being explored in this study, and in doing so to lay a foundation that the rest of this thesis will build upon. The VET sector has both many supporters and many critics, and has been the subject of much debate since national government involvement began in the 1970s. The discussion will now briefly introduce some of these debates, focusing once again on themes that are of most immediate relevance to this study.

**VET: A ‘tool of administrative rather than instructional reform’?**

With the size and complexity of the VET sector, many aspects of VET policy and practice have been subject to critique. This discussion will introduce three. The first relates to VET policy development and addresses the question of whether VET policy is based on research and consultation or on government agendas. The second relates to the adoption of competency based training (CBT) within VET and questions whether CBT is about improving educational practice or is instead a tool of administrative reform (Jackson 1993b, p.47). The third raises questions about language use in Training Packages, introducing the issue that is at the heart of this study.

**VET policy development: Research and consultation or ‘a culture of secrecy’?**

VET authorities confidently assert that decision making and policy development is informed by consultation with key stakeholders (ANTA 2003b, p.3; DEST 2005b p.VI). Similar claims are made for the status of research in VET. Andy Smith (2003, p.vii) argued that government funding has created a ‘world class VET research capacity’, and that ‘the VET sector in Australia is more effectively supported by relevant research than either the school or higher education sectors’. There are examples to support these claims; some VET reports describe wide ranging programs of research and consultation that underpin their conclusions and recommendations (Schofield & McDonald 2004). Yet from the earliest days of national government intervention in technical and
vocational education and training, the wider literature reveals concerns that the VET sector lacks a research culture and that significant changes are introduced without supporting research or consultation (Hawke & Cornford 1998; McDonald et al. 1993).

A succession of reports and policy developments in the period 1987 to 1993, collectively known as the National Training Reform Agenda (NTRA), introduced a scale and rate of change so significant that the VET sector was described as being ‘convulsed by its efforts to hasten a range of reforms’ (Butterworth 1994, p.19). After reviewing published VET research of the time, Perce Butterworth argued that emerging VET policy was not based on research and development, but was ‘taking place largely in a research vacuum’, leaving the sector dependent on ‘anecdote, hearsay and ‘gut feeling’’ (1994, p.20 & p.33). Geof Hawke and Ian Cornford argued that:

… the continuing succession of policy changes piling one upon the next. … usually have appeared ‘out of the blue’ as policy-makers and others have developed their policies well away from the eyes and ears of those who will be called upon to implement them. It is not unreasonable to suggest that a culture of secrecy has come to characterise VET policy-making in Australia. (Hawke & Cornford 1998, p.129)

It has been argued that the VET reform process privileged the perspectives of government, industry and the union movement (Hawke & Cornford 1998; Stevenson 1993). VET practitioners and experts in vocational education were unable to play a significant role in VET policy development, their involvement being limited to the role of ‘bystanders’ and ‘implementers’ (Stevenson 1993, p.88).

In response a formal review of the VET research effort (McDonald et al. 1993) a national research strategy was introduced, accompanied by a substantial increase in government funding. The National VET Research and Evaluation Program generated a substantial body of VET research, much of which is applied research aligned to current government priorities and designed to support the achievement of national goals and improve policy and practice (Chappell 2003, pp.23-24; Dawe 2003, p.4). Despite the availability of this funding, questions remain about whether major VET initiatives are necessarily supported by research. Training Packages were introduced as key element of the National Training Framework (NTF) in 1996. Rob Bluer, presenting ‘an ANTA perspective’, subsequently acknowledged that:
It’s important to understand that in developing this radical, if not revolutionary innovation of training packages, we didn’t do any research and development or carry out pilot projects. They were simply introduced. We are doing the research and development as we go. You can argue about whether or not that was a smart thing to do but political imperatives being what they are, there was probably no alternative. (Bluer 2000, p.7)

While the introduction of a funded research program has led to a significant increase in the level of research conducted in VET, its alignment to government priorities raises new issues. Peter Kell (2001, p.4) argued that VET research is subject to political interference, and expressed concern that a strong critique of VET policy is unlikely to be achieved when government funded research is closely aligned to current priorities.

The ongoing debate about VET decision making emerged as a key question in my project. Several national reviews were underway concurrently with my own research, including the review of the Australian Quality Training Framework, the High Level Review of Training Packages, and the review and development of the Training Package qualifications for VET practitioners. The national reviews of the AQTF and Training Packages both focused on implementation issues, rather than the fundamental structure of the regulatory framework itself (KPA Consulting 2004; Schofield & McDonald 2004). The review and development of the Training Package qualifications for VET practitioners revealed that VET consultation processes are largely unable to effectively respond to issues raised by practitioners, and this review process will be explored in some depth in the discussion and analysis presented in a later chapter.

**Competency based training: A ‘thicket of opinion’**

The adoption of competency based training as the only curriculum approach used in VET has been the subject of much debate (Collins 1993a). Richard Bagnall argued that CBT is based on a ‘normative view’ of education, humanity and society; he proposed that its underpinning values are not only incompatible with the postmodernism of contemporary society, but that they ‘combine to frame a powerfully and appealingly simplistic vision of what good education amounts to’ (Bagnall 1994, pp.34-36). Anne Winning argued that CBT as curriculum policy comes from the empirical-analytic paradigm, in which:
… the main interest is in technical control resulting in efficiency and accountability. It takes the stance that reality is objective and that people and world are separate. … Importance is placed on ways of knowing which can be quantified, thus other ways of knowing which cannot legitimately be quantified are not deemed worthwhile. (Winning 1993, p.106)

Driven by the need to produce a skilled workforce for industry, CBT relies on ‘experts’ to determine and monitor program content, and ‘reinforces existing status quo rather than promotes real change’ (Winning 1993, p.109). Nancy Jackson (1993b, p.55) argued that the primary aim of CBT is not to improve learning, but to make education and training institutions accountable, and she described CBT as ‘‘an intelligent and rational choice’ for policy makers who want to ensure that ordinary individuals who pay the piper for public sector learning will not get to call the tune’.

In contrast to these and other criticisms of CBT, Paul Hager and Andrew Gonczi (1993, p.36) argued that the conception of competence adopted in the National Training Framework was much richer and broader than the narrow conception assumed by critics of competency based training. Hager and Gonczi (1993, pp.40-43) claimed a number of benefits in this rich conception of competence: integrating attributes and tasks can promote the integration of general and vocational education; inferring competency from the performance of complex and inter related tasks in a particular situation uses an ‘holistic’ rather than an ‘atomistic’ approach; the richer conception of competence supports teaching and assessment, allows for flexibility in performance, and encourages high quality work.

Cherry Collins noted the existence of widely varying views in what she referred to as the ‘thicket of opinion’ within the competency debate in Australia, including:

… the enthusiastic commitment of the campaigner; the ‘no choice’ acceptance of the bureaucrat; the ‘we can subvert this and get it to work educationally’ argument of the educational policy adviser; the cries of pain from those seeing good education being replaced by jargonistic ritual; the exploration of research which suggests that at least part of the competencies agenda cannot work; and the arguments that the whole current discourse is dangerous because it shifts the balance of power in the wrong direction and threatens crucial educational purposes in a democratic society. (Collins 1993b, p.11)

In the wider context of this ongoing debate, competency based training and assessment against national industry competency standards remains the only curriculum approach available for use in VET. The privileged position of CBT is not just asserted in policy
The Australian VET sector: An institutional form

statements, but is embedded throughout the entire regulatory framework including Training Packages, the Australian Qualifications Framework, and the Australian Quality Training Framework. The impact on local practice of the particular approach to CBT that arises from this regulatory framework is a key issue that will be explored in later chapters of this thesis.

The language of Training Packages: ‘not English as we know it’

The remaining theme to be introduced in this overview of the VET context is the issue that is at the heart of my study: the way language is used in Training Packages. One of the trends apparent at practitioner level is that the VET ‘reform’ process has been accompanied by the development of a particular and recognisable language form. This process began with the National Training Reform Agenda and continues as each new policy initiative is accompanied by its own suite of additional VET terms.

In the early days of competency based training Giselle Mawer and Laurie Field (1995) identified the language used in competency standards as a barrier to many employees. Participating in VET learning and assessment requires different, often higher, language skills than are required to perform the duties of the job role for which the learning or assessment is being undertaken (Adams & Holden 1998; Mawer & Field 1995). Even workers who participate in the development of competency standards can find that the standards they contribute to become unrecognisable after the language has been edited to make it more ‘polished’ (Mawer & Field 1995, p.39). With the incorporation of competency standards into national Training Packages, there is emerging evidence of widespread practitioner resistance to this language:

‘A major problem with many Training packages [sic] is the lack of plain English’ (NAWT 2001, p.46).

‘… the language is not English as we know it’ (BSTA & NAWT 2002, ID#99).

‘Training Packages have their own language and sets of jargon that is not necessarily understood by workplace assessors and trainers’ (Del Grosso & McKenna 2000, p.24).

This resistance is visible in many situations where VET practitioners gather to talk about or work with Training Packages. The following examples are drawn from a selection of
workshops and conference presentations conducted by VET practitioners. Jenny Ferber (2003) described the language of VET as ‘a code that has to be translated into real speak’, and she placed this language at the top of a list of challenges and barriers confronting a major national corporation seeking to offer its staff nationally recognised training. Marion Marik and Will Brandner (2004) explicitly identified the language of Training Packages as a critical issue in providing workplace training within the hospitality industry; ‘Translate the Training Package’ was first in their list of six ‘top tips’ for dealing with workplace training issues. Odette Haley and Judie Pettitt (2004) also identified the language used in Training Package units of competency as a barrier, particularly for Indigenous learners. They argued, however, that merely ‘simplifying’ this language for participants does not empower them for ongoing engagement with the VET system. Instead they recommended ‘demystifying’ the language, or helping participants understand it and see how it fits into the ‘jigsaw puzzle’ of VET. Geoff Oliver (2004) identified the language of Training Packages, the AQTF, and local learning and assessment plans based on these national texts as a major issue both for students preparing for work in the film and television industry, and also for the industry professionals performing specialist delivery or mentoring roles. The reactions of industry professionals confronted with these texts were reported as: ‘Glazed look’; ‘Show me the door quickly’; ‘What have I signed up for?’; and ‘I thought you wanted me for my expertise’ (Oliver 2004).

The above examples highlight the fact that, while Training Packages specify performance standards for industry workplaces, the language used in each Package is typically not the language of the industry to which it relates. Peter Waterhouse (2000, p.27) stated that ‘much of the peculiar acronym rich language of the training industry in Australia … is pretty much restricted to the training industry and its own bureaucracy. It is certainly not the language of any workplace where we have been engaged’. Oliver (2004) used the unit of competency ‘Set up and operate a basic video camera’ to contrast the language used by the Training Package to that used by industry. An extract from that example is presented in Figure 1, which appears on the following page.
As my research project progressed I gathered many such examples. I drew some from conference presentations, others were provided by informants to my study, yet others were forwarded to me by colleagues who encountered them in their work and wanted to share them. In many of these examples the contrast between Training Package language and industry language approaches the bizarre. The issue that I set out to explore in my research project is immediate and real; people in VET are confronted with this language every day. Yet writing academic papers about the language of Training Packages as a PhD research project can construct the issues at stake in ways that render them distant from local experience. In my conference presentations and workshops I adopted the

---

**Where the Film, TV, Radio and Multimedia Training Package says:**

- Disassemble camera, accessories and support equipment
- Break down and carry video camera, accessories and supports employing safe lifting techniques
- Clean and safely pack all equipment into cases to avoid damage and prepare for transport
- Report and document any equipment that is damaged and requires maintenance to the relevant personnel
- Leave the filming site in the original or improved condition, ensuring that there has been no adverse impact on the site

**Someone working in the industry might say:**

Wrap up the gear.

(Oliver 2004)

---

Figure 1: Training Package language and workplace vernacular: Extract from Unit CUFCAM01A ‘Set up and operate a basic video camera’
practice of incorporating actual examples of the contrast between Training Package language and the same ideas expressed in workplace vernacular by informants to my study, to ensure that what I was presenting was grounded in the everyday realities confronted by people engaging with VET. This proved particularly useful in making my research ‘real’ for people who have no experience working with Training Packages. I will continue this practice by concluding some of the chapters to follow with such examples.

These examples draw attention to the difference between the language of Training Packages and the widely varied vernacular of local workplaces, and they reflect my study’s focus on the use of Training Packages in workplaces. Unlike many TAFE students who enrol in a course with no background in the job role they are preparing for, workplace employees approach learning and assessment with some level of familiarity with the job role and the context in which it is performed. They may be experienced employees or even workplace learning and assessment staff who are highly familiar with the language of the particular job role. Alternatively, they may be preparing to move into a new role in a workplace where they are more familiar with the language of the context than the technical language of the particular role in question. In either case, most employees participating in learning and assessment have some background in the ‘ways with words’ (Heath 1993) used in their workplace. The examples included in this thesis illustrate the difference between the ‘ways with words’ represented by Training Packages as compared to those used in everyday workplaces. They are examples of what James Gee called different Discourses (Gee 1996).

James Gee, Glynda Hull and Colin Lankshear (1996, p.10) used ‘Discourse’ (with a capital ‘D’) to refer to a ‘set of related social practices’, and to distinguish it from ‘discourse’ which they used to mean ‘language in use’. James Gee argued that:

Discourses … are ways of behaving, interacting, valuing, thinking, believing, speaking, and often reading and writing that are accepted as instantiations of particular roles … by specific groups of people, … Discourses are ways of being ‘people like us’. They are ‘ways of being in the world’ … They are, thus, always and everywhere social and products of social histories. (Gee 1996, p.viii [emphasis original])
In Figure 1, ‘wrap up the gear’ is a statement made within the context of a particular workplace Discourse where the way in which the gear is to be wrapped up is an implicit part of the use of professional expertise and does not need to be stated. It is part of the way of being in the professional world of film and television. In the learning program described by Oliver (2004), industry professionals are employed to mentor novices and to perform specialist delivery roles. They are engaged in inducting new members of the Discourse through a combination of ‘acquisition’ through exposure to models (mentoring), and ‘learning’ conscious knowledge (specialist delivery roles) (Gee 1996, p.138). The industry professionals draw on their expertise to demonstrate how the gear is to be wrapped up, to judge whether novices have performed this task correctly, and to provide guidance where needed.

Many VET assessors would argue that in this example, and in others presented in this thesis, the workplace vernacular does not cover everything included in the competency standard. Training Package competency standards are part of a VET Discourse in which performative assessment is used to ensure national consistency. Within this Discourse the aspects of performance that, to a professional, are implicit in ‘wrap up the gear’ must be made explicit to render them observable, objective and quantifiable (Winning 1993, p.106). This demands explicit statements of what gear is to be wrapped up (video camera, accessories and supports), and how it is to be wrapped up (using safe lifting techniques, to avoid damage, and to prepare for transport). It also demands explicit statements of other considerations from the wider context (reporting damaged equipment and ensuring that the site is left in original condition), which in a workplace Discourse might be implicit indicators of good practice.

By writing competency standards in this way the Training Package enters workplace performance into a powerful VET Discourse, but if the people involved in judging local performance are not members of this Discourse they experience this language as a code or barrier (Ferber 2003; Haley & Pettitt 2004). In order to read Training Packages and use them as guidelines for judging workplace performance you must be a member of the dominant VET Discourse and have experience working with Training Packages in this way (Gee 1996, p.41; Gee, Hull & Lankshear 1996, p.3). When these texts are used to
make judgements about whether or not individual employees will be awarded educational qualifications, they perform a gatekeeping role (Fairclough 1989, p.47). ‘Translating’ the Training Package is one strategy used by workplace educators to shift these gatekeeping encounters from the imposed Discourses of Training Packages to the accepted Discourses of the workplace.

Concerns about the language of Training Packages and VET have also been acknowledged in presentations by staff members of VET authorities. Judith Uren (2003) reported that one working group of officials identified the need to improve the language of VET if the sector was to achieve its goal of servicing the needs of business, individuals and the wider community. Janina Gawler (2004), while chief executive officer of ANTA, presented a keynote address in which she explicitly identified the VET sector’s use of acronyms and complex language as a barrier to people engaging with the system.

These examples, however, are unusual. The more typical response of VET authorities was reflected in a presentation which reported that research relating to professional development identified the need for VET practitioners to ‘improve their capacity to interpret training packages’ (Comley & Stowell 2004). This need for professional development was presented unproblematically, with no apparent discussion about the features of Training Packages that make them difficult for practitioners to interpret. This approach focuses not on the texts themselves, but on presumed deficiencies in the skills of the people who work with these texts, and it is characteristic of the VET system response when practitioners are excluded by the language of VET texts.

Within VET, questions of language are addressed within established policies on ‘Language, Literacy and Numeracy’, commonly abbreviated to ‘LL&N’ or ‘LLN’. These policies are supported by an extensive body of literature (Falk & Millar 2001; Watson, Nicholson & Sharplin, 2001). Ian Falk and Pat Millar (2001) identified three main approaches in research on literacy and numeracy in VET: basic skills approaches; growth and heritage or ‘whole language’ approaches; and critical-cultural approaches. While the range of VET literature includes works informed by critical-cultural theory, this approach has less impact on VET practice than do the ‘basic skills’ or ‘whole
The Australian VET sector: An institutional form

language’ approaches (Falk & Millar 2001, p.2). Damon Anderson (2000, p.31) reported that when he conducted a literature search he found ‘almost nothing from a broadly critical perspective on language, literacy and numeracy within the context of training packages’. Despite having the potential to support a socially critical approach to language and literacy, the Training Package model emphasises functional literacy. This places the focus on the basic language skills of individuals, with language itself generally being regarded as neutral. At the VET policy level language is not seen as constructing identities or power relationships; it is presented as a neutral medium used to convey content and meaning. At this level the language form used in Training Packages and other official VET texts is generally not open to challenge or analysis.

Before moving on I should note that my study’s focus on the way language is used in Training Packages and related official texts does not seek to imply that language use in general across VET is homogeneous. Language use ‘on the ground’ reflects the diversity of the VET sector itself. Training Packages, as official texts imposed by regulation, use a particular language form that fails to reflect this diversity of language use in practice. The issues being explored in this research project have their starting point in the discrepancies between the language form used in Training Packages and the vernacular of industry workplaces, and the impact that these discrepancies have on people engaged in workplace learning and assessment.

The themes raised in this introduction to the VET context will be further explored in the later chapters of this thesis. Before proceeding, I need to explain some aspects of my own use of language.

**Terminology used in this thesis**

*‘Teachers’, ‘trainers’ or ‘VET practitioners’?*

Erica Smith and Jack Keating (2003, p.230) estimated that there may be as many as 390,000 people working in VET teaching and training. While there are many terms currently in use to refer to a member of this workforce, it is a ‘disparate body’ of
professionals that cannot be considered homogeneous (Clayton 1999, p.1), and there is no single term that expresses a universally accepted professional identity.

When the national VET sector brought trade training, technical education, and workplace training together under a single regulatory framework it brought together people who have historically operated with very different professional identities and qualifications (Chappell 2003, p.26). Tradespeople who supervise and train apprentices generally draw their professional identity from their trade, and while they hold trade qualifications may not hold any education or training qualifications. TAFE staff generally identify themselves as teachers or lecturers, and often hold university level teaching qualifications. Enterprise employees who provide learning and assessment activities in the workplace may draw on a range of professional identities including: training officer, staff development officer, supervisor / manager, mentor / coach, facilitator, Human Resource Development officer, or even consultant if they provide their services on a subcontract basis. While enterprise trainers generally have vocational expertise, sometimes combined with vocationally relevant qualifications, their educational qualifications may range from no qualifications at all, a non-accredited ‘train-the-trainer’ course, a Certificate IV in Assessment and Workplace Training, or university qualifications.

The VET sector has yet to resolve the underlying tensions between these different professional identities and range of qualifications. Two widely used identity terms are ‘teacher’ and ‘trainer’, yet neither is universally accepted. Workplace educators in particular tend to reject the term ‘teacher’, associating it with the power relationships inherent in formal and highly structured classroom activities. They prefer terms like ‘facilitator’, which are seen as constructing their relationship with participants as ‘an emancipatory one’ (Farrell 2000, p.31). Some teachers reject the term ‘trainer’, associating it with a narrow and behaviourist stimulus-response approach more appropriate to training animals.

In 2001 the AQTF introduced the first qualification requirement for RTO staff, requiring staff who were involved in learning or assessment to hold nominated units from the Certificate IV in Assessment and Workplace Training, a Training Package qualification
The Australian VET sector: An institutional form

(ANTA 2001a, p.17). The introduction of this qualification requirement was not always well handled and in some cases may have exacerbated, rather than resolved, the differences in professional identity. The *Certificate IV in Assessment and Workplace Training* was strongly oriented to competency based training and VET, and it included content not typically addressed in teacher education programs. Holding a university level teaching qualification did not grant automatic recognition. Many university qualified teachers found themselves underwhelmed by the requirement that they undertake professional development to obtain a Certificate IV qualification. Conversely, highly experienced educators who obtained positions in TAFE on the basis of holding the required Certificate IV could find themselves denied access to promotion, and in some cases limited to the pay rate applicable to unqualified lecturers, if they did not also hold qualifications within a narrow range recognised as teaching qualifications.

The absence of a unified professional identity for VET practitioners has particular significance for my research project, and will be discussed in later chapters. In the meantime throughout this thesis I have adopted the term ‘VET practitioner’ to refer to VET staff. This term itself is not entirely unproblematic, but it is at least free from the negative associations that have become attached to the main alternatives. It is a term that is in use (Mitchell et al. 2005; Rumsey 2002) and will be recognised by my VET readers. While I do not anticipate that many will particularly embrace it, I sincerely hope that none will find it offensive and I apologise unreservedly to any who do.

‘Students’, ‘trainees’, or ‘VET participants’?

Once again, choosing a term to refer to individuals who are undertaking learning or assessment raises issues of position and identity (Boud & Solomon 2003).

The primary focus of this research project is on the use of Training Packages to support workplace learning and assessment. Workplace employees generally do not consider themselves to be ‘students’, even if they are participating in a learning or assessment program that leads to a formal qualification. In what sense does an experienced employee who participates in a professional development activity surrender their position and status in the organisation to take on the identity of ‘student’? Similarly,
employees do not necessarily consider themselves to be ‘learners’. David Boud and Nicky Solomon (2003, p.326) described the ‘politics and identity tensions’ associated with workers identifying themselves as learners, particularly the suggestion that ‘having an identity as a learner may not be compatible with being regarded as a competent worker’. A further consideration in my own study is that many workplace VET programs involve some element of using Training Package standards to award qualifications in formal recognition of an employee’s existing competencies. This possibility further complicates the identification of these employees as ‘learners’.

‘Trainee’ is a term that holds similar associations. As a workplace trainer in the 1980s I was able to refer to participants in almost any training course as ‘trainees’ with no particular negative connotations. When the national government introduced ‘traineeships’ as a 12 month structured training program in industries that were not included in the apprenticeship system, the term ‘trainee’ began to acquire connotations of inexperience, youth and entry level training. In 2005, the only employees who consider themselves to be ‘trainees’ are typically those participating in a formal traineeship program.

Some VET texts use the terms ‘learners’ and ‘assessment candidates’, with ‘applicants’ used to refer to those seeking recognition of current skills. These terms make a distinction according to the nature or phase of a program that individuals are engaged in, distinctions which have little application in the context of this thesis. An alternative used in VET is the market term ‘clients’, but at no stage did I consider adopting this term, which is associated with state intervention and economic policy agendas (McIntyre 2000, p.105).

Throughout this thesis I have adopted the term ‘participants’ to refer to people who are engaged in a program of learning or assessment. Like ‘practitioners’, ‘participants’ is a term that is in use and will be recognised by my VET readers. By focusing on the participation itself, rather on the nature of the participation (‘learning’, ‘training’ etc), I hope that this term will be free from the connotations of inexperience or lack of competence that have become attached to some of the alternatives.
Recognising existing skills

One of the benefits claimed for competency based assessment is that individuals are able to be assessed, and potentially be issued with a qualification, based on their existing competencies without being required to attend a program of training (WADoT 2002a, p.17). In VET this process is variously known as ‘Recognition of Prior Learning’ (RPL), ‘Recognition of Current Competence’ (RCC), ‘skills recognition’ (‘skills rec’), ‘assessment only pathway’, and simply ‘recognition’. Of this range of terms, most VET readers will be familiar with ‘Recognition of Prior Learning’ or ‘RPL’, even though it may not be their preferred term. Because of its wide familiarity I will use ‘Recognition of Prior Learning’ or ‘RPL’ in this thesis except where I am directly quoting an informant or a source that uses a different term.

Capitalisation and italicising VET terms

The term ‘training packages’ (all lower case) is a well established term that has long been used to refer to locally developed and locally used learning and assessment resources. ‘Training Packages’ (with capital letters) is a VET term that refers to government endorsed national assessment standards. Both uses occur in the interview data from my study, and I have maintained the capitalisation of the formal VET term only as a means of distinguishing between the two meanings.

The full titles of Training Packages and associated VET qualifications are generally quite long and throughout this thesis italics are used to differentiate such full titles from the surrounding text. This is not necessarily an established convention, but it improves the readability of passages that include references to these texts.

Conclusion

The national VET sector is the context in which I have undertaken this study, but it is a context that is not generally understood by people who are located outside VET. This chapter has introduced some of the key elements of the regulatory and governance frameworks that establish the VET sector as an institutional form, and it has provided a brief overview of some of the critiques that have been made of VET. Its purpose has
been to introduce readers to structures, concepts and themes that are explored in this study and will be discussed further in the later chapters of this thesis. The following chapter will introduce institutional ethnography as the conceptual framework I used as I explored the issues of language and Training Packages that are at the heart of this study.
Chapter Two: Institutional ethnography: Mapping the social relations of VET

Introduction

Just as the VET sector is different to other sectors of education, institutional ethnography is ‘an emergent mode of inquiry’ that differs from more conventional approaches to research (DeVault & McCoy 2001, p.752). Like VET, institutional ethnography requires some explanation (Campbell & Gregor 2002, pp.54-55).

This chapter will explain how I came to select institutional ethnography as the conceptual and methodological framework for this study. The discussion will outline my research project as I originally described it, and it will briefly touch on other research approaches that I explored and decided not to pursue. It will outline how and why I selected institutional ethnography as an approach to research that would allow me to use my disquiet as a starting point for research, bring into view social relations that are not visible in local sites, and produce a report that encourages debate and supports resistance. The chapter will close by outlining the new understanding I began to develop as I used my research topic to identify a problematic that brought into view how local learning and assessment activities are put together, and how they are tied into the wider social relations of VET.

The chapter will begin by introducing my research project as I described it in my original proposal.

A proposed research project

My PhD research project began with an application for admission to higher degree by research with Deakin University. Submitted in September 2001, this was my first attempt to articulate the questions and concerns that lay at the heart of my sense of disquiet and it included the following statements:
Based on 10 years experience as a vocational education and training practitioner I believe that the VET sector uses language in a way that is contrived, and is culturally, socially and contextually specific. …

My personal perspective on the use of language is consistently endorsed in my interactions with VET stakeholders … Yet as a VET practitioner and researcher, most of the material I receive on this topic is what I would call a deficit model. The problems that VET learners have with language are seen as arising from inadequacies in their own literacy and language skills. I have not seen any VET literature looking at language in terms of its role in power relationship issues. …

My ultimate goal is to publish my research in an attempt to take this issue beyond its current status as a topic for informal discussion and ultimately get it onto the agenda in the debates surrounding the VET sector. I believe that the issues that never get debated are the ones that are least likely to be addressed.

From the outset, my research project was firmly grounded in concerns and disquiet arising in my own practice within VET, and my belief that the issues I was struggling with had their origins in the power relations of the VET system itself. In this research proposal I was positioned as a practitioner who engaged in active debate about these issues but who had no exposure to literature that would support my attempts to theorise or explicate these aspects of my experience. My stated intent was to use my research project to gain insights and to produce a resource that would encourage wider debate and resistance.

**The conceptual frameworks of VET**

From the outset I believed that my choice of methodology and conceptual framework would be crucial to achieving my goals. One option for approaching this topic was to explore it using the conceptual frameworks and literature that informs VET policy development. Indeed, at the time I submitted my research proposal I was working in a VET research unit and there was an informal suggestion that I might be able to maintain my employment and undertake my PhD research through that unit. Financially this was a tempting suggestion, but I chose not to pursue it. My stated position for some time has been that it would be difficult, if not impossible, for the research project that I had in mind to be undertaken within the conceptual frameworks and policy constraints of VET. Marjorie DeVault (1999, p.2) argued that ‘research, like any human activity, is socially organized and shaped by the organizational contexts in which it occurs’. I believe that the VET policy context has significant impact on what research questions can be asked,
Institutional ethnography: Mapping the social relations of VET

how they will be approached, and how (indeed, even whether) the results will be published (Grace 2005a). A VET research project exploring issues surrounding the language of Training Packages would ask very different questions from those I would like to ask.

In exploring issues that arise from VET practitioners’ engagement with the language of Training Packages I wanted to adopt a position that held the language and operation of the texts themselves open to challenge. To approach my project using the conceptual frameworks of VET would bring a number of policy considerations into play, and would be likely to change this position. Training Packages are a key part of the VET regulatory framework, ‘intimately intertwined’ with other elements such as the Australian Quality Training Framework (AQTF) and the Australian Qualifications Framework (AQF) (Schofield & McDonald 2004, p.6). Even the wide ranging High Level Review of Training Packages focused on implementation issues, acknowledging that there was no will to change fundamental underpinnings (Coates, in Schofield & McDonald 2003, p.1). In this policy context, research into language issues that arise in engagement with Training Packages would almost certainly be framed within VET policy on language literacy and numeracy. This would focus on the constructed language deficiencies of individuals who find themselves excluded by the language of Training Packages, rather than focusing on issues to do with the nature and operation of the texts themselves.

This policy focus is clearly evident in a sequence of texts that will be examined in a later chapter. The national review of the Training Package that contains the qualifications for VET practitioners explicitly identified the complex language as a significant accessibility issue (NAWT 2001, p.44). The official response was not to modify the language, but rather to establish this language as the language and literacy benchmark for VET practitioners and entrench its use as a compulsory assessable requirement (ANTA 2004a, pp.42-43 & p.72). Gary Kinsman (1997) described how problems arising from Canadian government responses to AIDS were relocated as an incapacity within individuals living with AIDS/HIV. In the Australian VET sector, disquiet about the language of Training Packages tends to be relocated as an incapacity in the people who work with these texts. To undertake a research project that held the language itself open
to challenge I needed to approach my study as an individual PhD student with access to a ‘creative space’ for critique and the resources and guidance available through higher education (Brown & Hodges 2003, pp.3-4).

**Conceptual frameworks from critical literature**

In my first year of study I began to explore literature informed by ‘critical-cultural’ approaches to language (Fairclough 1989; Gee 1996; Gee, Hull & Lankshear 1996; Heath 1983). Even as I found this literature useful in theorising my position of power as a VET practitioner relative to the regulatory apparatus of VET, I struggled with some of the answers it provided when I used it to theorise questions of practice at the local level.

The activity in which Training Packages are activated is when VET practitioners use them to support local learning and assessment programs. It is at this level where both practitioners and participants are confronted by the language of these texts. Using conceptual frameworks from the critical-cultural literature as a basis for theorising what is happening at this level suggested possible answers that were at odds with my own experience as a practitioner. In implementing Training Packages are VET practitioners acting as gatekeepers, members of a powerful group using language and professional jargon to exclude others in a struggle over power? (Fairclough 1989, pp.43-48). Are practitioners unaware of the effect of this language, using it in unquestioned or unchallenged practices? (Fairclough 1989, p.40). If I relinquish my standpoint as a VET practitioner and adopt a standpoint grounded in the literature on language and power, some of the answers that I find construct VET practitioners as an active part of the problem. Am I really implicated in the very power relationships that I have tried to challenge? The answer, of course, is yes I am. Confronted with this, I found myself increasingly engaged with questions about how I become implicated.

While some VET practitioners have developed strategies to avoid confronting participants with Training Package language, others recognise this language as a significant barrier but still find themselves enacting practices that require participants to deal with it. It is this that gives rise to a sense of disquiet and disjuncture, increasingly being expressed by practitioners as a sense of frustration about being caught in a
Institutional ethnography: Mapping the social relations of VET

professional dilemma and struggling to find an appropriate response. And it was from this standpoint that some of the explanations available to me in the literature just didn’t ‘feel right’. I was searching for an approach that would allow me to explore the inconsistencies, dilemmas and contradictions that confront practitioners in everyday practice in local sites.

I found myself becoming interested in how the relationship between individual VET practitioners and participants in local workplaces is coordinated by Training Packages and other VET texts. How do practitioners organise their relationships with participants in relation to the wider VET sector, and what consequences does this have for both practitioner and participant? In my first year of study I found much in the literature that was generative, powerful and useful in theorising wider issues of language and power, and of the VET context overall, but nothing that focused on the particular issues that were at the heart of my sense of disjuncture.

As my study progressed I found an approach which explicitly addresses the frustration, disquiet, and disjuncture associated with local experiences that seem disorganised, incoherent, or simply puzzling (Campbell 1998, p.70; Grahame 1998, p.351). Institutional ethnography sees these experiences as pointing to social relations that permeate the local environment but have their origins outside it. Such experiences direct attention to a problematic that needs to be investigated (Grahame 1998, p.351).

**Institutional ethnography**

An approach to the social organisation of knowledge, institutional ethnography was introduced by Canadian sociologist Dorothy Smith (Campbell 1998, p.56; DeVault 1999, p.46), and was developed in a number of key works (Smith, D.E. 1987, 1990a, 1990b, 1999b). Institutional ethnography does not see power relations in terms of ‘heavy handed and unitary’ approaches (DeVault 1999, p.49), nor is the state seen as a ‘monolithic structure’ which is somehow above and separate from local sites (Ng 1988, p.22). Dorothy Smith argued that power is pervasively structured through what she called the ‘ruling relations’.
When I write of “ruling” in this context I am identifying a complex of organized practices, including government, law, business and financial management, professional organization, and educational institutions, as well as the discourses in texts that interpenetrate the multiple sites of power. A mode of ruling has become dominant that involves a continual transcription of the local and particular activities of our lives into abstracted and generalized forms. It is an extralocal mode of ruling. ... It involves the construction of the world as texts, whether on paper or in computer, and the creation of a world in texts as a site of action. (Smith, D.E. 1987, p.3 [emphasis original])

Official texts are neither passive nor neutral; they actively organise and coordinate local activities (Kinsman 1997, p.216). Organisational knowledge is textually mediated. Work is coordinated, organised, and made accountable through text-based practices, and the way these texts are enacted at the local level is part of the meaning that they carry (Campbell 1998, p.58; 2003, p.3). Marjorie DeVault (1999, p.49) illustrated this process using the example of family life. Usually seen as something private and individual, family settings are permeated by multiple institutional processes related to issues such as employment, education, and health care. How family members organise their home life around these institutional processes has consequences both for the individual family member and for the family as a whole.

Roxana Ng’s (1988) study of a community based employment agency revealed the role played by texts and documentary processes which penetrate and organise local organisations, becoming part of the organisation’s own internal relations and processes.

… texts are a central aspect of ruling in advanced capitalism: they provide for and sustain the legality of the state. Indeed, texts and documents have become the general mode of ruling in advanced capitalist societies. Thus, it is impossible to understand the relation between state (ruling) processes and community struggles without understanding how documents work in mediating, enforcing, and transforming everyday life. (Ng 1988, pp.90-91)

Explicating the ways in which local practices are socially organised by regimes external to the local structure is described as a process of ‘making visible the dailiness of practice within that structure, and people’s various attempts to navigate through regimes of control’ (DeVault 1999, p.52). Marie Campbell and Frances Gregor (2002, p.24) described oppression and domination as ‘happening in the routine exercise of power’, rather than necessarily being ‘the products of morally reprehensible people acting badly’.
I found institutional ethnography an extremely useful framework for explicating power relations within VET. The regulatory framework of the contemporary VET sector has been in place for little more than 20 years, a period of significant change driven by national agendas. Prior to the establishment of the national system, technical and vocational education focused on local needs, especially in the provision of enterprise based workplace training. The regulatory framework of the national VET sector did not so much create something that wasn’t already happening; it created a complex of organised practices to control and extend existing activities in trade training, technical education and workplace learning. This regulatory framework was substantially established through a process of generating texts that construct the VET sector as a site of action. Documents available in hard copy or from the Internet constitute vast libraries of extralocal texts, including key regulatory texts such as Training Packages, the Australian Quality Training Framework, and the Australian Qualifications Framework.

Institutional ethnography argues that individual organisations take up and activate ruling concepts in the local activities and procedures that they adopt as they engage with and implement ruling texts (Campbell 2003). Social regulation within VET is actively accomplished by individual Registered Training Organisations in the way in which they take up texts such as Training Packages and the AQTF. These texts take activities at the level of the local and particular and transcribe them into abstract and generalised forms. In using these texts as the basis for decisions about both the content and structure of local learning and assessment programs, everyday practices enacted at local workplace level are shaped by institutional processes that have their origins in the social relations of the national VET system.

As well as being a useful framework within which to explicate social relations within VET, institutional ethnography also offered an approach that would allow me to do the project I described in my original research proposal. I set out to draw on my experience as a practitioner for my starting point, to explore power relations that I sensed existed but could not see, and to produce a report that would encourage debate and support moves for change.
Using practitioner disquiet as a starting point for research

Using the conceptual frameworks provided by institutional ethnography, I begin my research from my standpoint in the everyday world of VET practice rather than from a theoretical position aligned with the ruling relations of the VET sector or the academy (Grahame, 1998).

The idea of standpoint as used in institutional ethnography is not about a particular identity, perspective, or set of experiences. It is about starting research in ‘material sites where people live their lives’ and using this point of entry to explore how those material sites are tied into wider social relations (DeVault 1999, pp.39-40; Grahame 1998, pp.356-358). Unlike some approaches to research, institutional ethnography does not require me to repudiate my experience as a basis for knowledge (Spence 2002). Indeed, my experience is central to my starting point. ‘It is the individual’s working knowledge of her everyday world that provides the beginning of the inquiry’ (Smith, D.E. 1987, p.154). My research project emerged from the disjuncture I experienced between the organisational processes that I enacted and my knowing by experience (Campbell 2003, p.8). Rather than being an external researcher located outside the VET sector and producing knowledge ‘about’ or ‘of’ VET and VET practitioners, I am an insider, standing beside the people who are involved in my project, being ‘on their side and in their position’ (Smith, D.E. 1977, cited in Campbell 2003, p.9) and producing knowledge ‘for’ them (DeVault 1999, p.47; Smith, D.E. 1987, p.153).

This is not a process of valorising experience or constructing it as ‘Truth’; experience is just a starting point for analysis (Campbell 1998, p.55). Simply understanding the local or providing a description through ethnography doesn’t go far enough, I need to look at the how and why behind the phenomena I am describing (Campbell 1998, p.56; Grahame, 1998, p.352). In asking questions about ‘how things work’ and ‘how it’s put together’ (Campbell 2003, p.11; DeVault 1999, p.49; Smith, D.E. 1987, p.147), my objective is not to simply produce descriptions or interpretations. I use my analysis of the local to bring into view the extralocal processes that organise what happens in everyday practice within VET. This approach honours lived experience, but it also situates that lived experience into a larger framework that is not always visible to people.
Institutional ethnography: Mapping the social relations of VET

at the local level (Spence 2002, p.36). As a VET practitioner, I am a participant in the ruling relations of VET, and my research seeks to ‘write the social’ (Smith D.E. 1999b), and open up exploration of those ruling relations from the inside.

**Bringing hidden social relations into view**

Reflecting its location within feminist methodology, institutional ethnography is an approach to research that sets out to discover and articulate social issues that have been hidden or unacknowledged (DeVault 1999, pp.55-56); it aims to disclose to participants things that are ‘outside their knowing’ (Campbell 1998, p.56). Connectedness is emphasised in Dorothy Smith’s approach (DeVault 1999, p.50), and is central to my study. Each local workplace is connected to the extralocal work of the VET regulatory framework, even though the connections may not be immediately visible to people in that workplace. Everyday practices enacted in local workplaces are shaped by institutional processes that have their origins in the social relations of VET beyond that local site. These social relations are not theoretical abstractions, they are connections and processes that actually link the learning and assessment activities conducted in the local workplace into the wider VET sector (Grahame 1998, pp.347-351). Institutional ethnography is a conceptual framework, but its premises are ‘conceptual reflections of actual relations among people’ (Campbell 1998, p.60 [emphasis original]).

While these social relations penetrate the local workplace, they are not always easily understood in the terms that are commonly used in that site. They manifest in those puzzling events that appear to not make sense, or that suggest that decisions are being made over which people in the local site have no control (Campbell 1998, p.70; Grahame 1998, p.351). Within VET, one way in which the social relations are manifest is in formal procedures that require VET practitioners to adopt learning and assessment practices that do not reflect what they understand to be good educational practice. Using these events as my entry point, the extended social relations that organise them can be identified and researched (Grahame 1998, p.351).
institutional imperatives, and examining the broader social relations in which local sites of activity are embedded. (Grahame 1998, p.347)

Originally conceptualised as a ‘sociology for women’, institutional ethnography has become a ‘sociology for people’ (Smith, D.E. 1999a), and is used in a range of research projects that explore hidden or unacknowledged social justice issues impacting on marginalised groups (DeVault 1999, pp.54-57; Kinsman 1997; O’Neill 1998). It is a means for people to explore various forms of oppression and gain insight into the social organisation of their world through institutional practices (Grahame 1998), and is of interest to ‘all those whose lives are subject to the ruling relations’ (Campbell 1998, p.56).

This study explores the VET regulatory framework as an extended form of social relations that include specialised discourses which accomplish ‘ruling’ (Grahame 1998, p.349). This is a project of ‘excavation’ or ‘archaeology’ (DeVault 1999, p.30; Kinsman 1997, p.221). I am opening up for investigation an aspect of everyday practice in VET that has not been addressed through official VET consultation processes or academic research. As I explore these issues I also seek to explicate the ideological mechanisms that have made them ‘ignored, censored and suppressed’ (DeVault 1999, p.30). My research uses the disjuncture experienced by people at the local level as an entry point to build what Marjorie DeVault (1999, p.50) referred to as a ‘3D’ view, and Dorothy Smith (1987, p.175) described as a ‘map’.

This is not intended to be deterministic. My objective in mapping this terrain is not to tell my colleagues how or where to move, but to show ‘how here and there are related on the ground’ (Smith, D.E. 1993, p.188). The analysis aims to show how VET practitioners become implicated in the social relations of VET despite their opposition to them. As VET practitioners begin to understand how their work is coordinated and organised within those social relations, they can begin to organise to resist the hegemony imposed (Kinsman 1997, pp.233-234).
Producing a report that encourages debate and supports resistance

Institutional ethnography points to social transformation, and the outcomes of my study are intended to become a resource for VET practitioners seeking to achieve change (DeVault 1999, p.51). Approaches that use abstractions from everyday life can discourage activism, but institutional ethnography encourages practitioners to discern complex interconnections, make sense of their lives and work, and acknowledge and understand the tools of power (Spence 2002, p.35). As VET practitioners see how things are put together, and how they participate in this process, they can plan to act differently (Campbell 2003, p.20). Nicholas Spence (2002, p.38) described institutional ethnography as ‘sociologically strong and politically emancipatory’. This is not to suggest that conducting an analysis is sufficient to bring about change. The ruling relations don’t just disappear because people know about them; they have been described as being ‘like the water that fish swim in’ (Campbell 1998, p.70). But knowing about them can reduce the sense of frustration, and the analysis can provide knowledge that informs practice and opens up opportunities for action (Campbell 1998, p.56; O’Neill 1998).

Publicly engaged knowledge should help people understand their worlds, and not just produce esoteric knowledge for elites (Spence 2002, p.29). Traditional academic research that produces a ‘highly theorised dissertation’ may not align with VET practitioners’ primary concerns (Brown & Hodges 2003, pp.1-2). In contrast, my PhD project has been undertaken, as suggested by Marjorie DeVault (1999, p.53), with an eye very much on producing knowledge that my colleagues and I can use.

Being able to step aside from my role as a full-time VET practitioner for a period of time to conduct a PhD research project into an issue that I have struggled with in my own practice is an opportunity that few of my VET colleagues share. But to conduct this study it was essential that I do this. ‘The institutional ethnographic approach to social change assumes a division of labor between scholars and activists – or at least a distinction between moments of inquiry and activism’ (DeVault 1999, p.53). While acknowledging the central role of the expert practitioner in such research, Dorothy Smith (1987, p.161) argued that disclosing the extralocal social relations that organise
everyday experience requires specialised investigation. At the outset of my research project I was most conscious of my need for financial support and access to resources. Now, looking back, I realise that even more important has been simply having the time to devote ‘sustained attention’ (Smith, D.E. 1987, p.161) to exploring these issues and becoming familiar with the literature that has guided my process of explication.

A further aspect of institutional ethnography that held significant appeal was Dorothy Smith’s advice that the ‘map’ produced from an institutional ethnography study should be ‘ordinarily accessible and usable’ (Smith, D.E. 1999b, p.95). George Smith (1995, p.32) argued that institutional ethnography studies ‘are designed to be written up, published and made available to all members of a grass-roots organization for their political consideration. They are intended to provide, on a day-to-day basis, the scientific ground for political action’. If VET practitioners are to make the connections between research findings and their own practice, they need to be aware that the research exists and see it as being valuable (Clayton 1999). If the findings of my research project are to be valuable to my colleagues, any publications need to be comprehensible to people whose background is VET practice and not academic research. Furthermore, as my starting point is disquiet about the use of excluding language in official texts, at least some of my colleagues will expect me to live up to my own rhetoric.

Redefining my research project

As my understanding of institutional ethnography developed, I began to think about my research project differently. This can be represented by redefining my original research proposal:

The starting point for this research project is a powerful sense of disquiet and disjuncture that I experience as a VET practitioner engaging with the language used in Training Packages.

My project seeks to use this starting point to explicate the ways in which learning and assessment practices conducted in local workplaces are socially organised by the ruling relations of VET, and to explore how the voices of practitioners are silenced in VET policy development and research.

The objective of my study is to highlight issues of social justice in VET, raise awareness of marginalisation, and produce a resource that will inform practice and support practitioners seeking to resist hegemony and achieve change.
In returning to my original research proposal and reframing it using concepts from institutional ethnography I am not attempting to retrospectively position myself as a graduate student who, from the initial conception of my project, planned it as an institutional ethnography study. While such an account may conform to the scholarly expectations of doctoral research, it would not reflect my research journey as I experienced it. An account that would more closely represent my research journey would be one that positions me as a VET practitioner who set out to explore the VET sector’s use of an excluding language form and who, along the way, discovered institutional ethnography as a framework that would support my enquiry.

Marie Campbell and Frances Gregor (2002, pp.14-15) noted that even graduate students who are community activists are more likely to approach research on the basis of potential career enhancement rather than seeking out a particular approach to researching their own practical problems. Nevertheless I did indeed approach my educational program as an opportunity to research a practical problem that I have been struggling with for some years, and acquiring a qualification was a secondary consideration. I embarked on my research project very much aware of its status as a ‘political undertaking’ (Campbell & Gregor 2002, p.16).

When my study commenced I approached my topic entirely from the perspective of a practitioner with an issue to explore and no theoretical frameworks with which to explore it. I was distantly aware that feminist research had looked at issues of language and power, and I embarked on my own project trusting that there would be something ‘out there’ that I could draw on. Towards the end of my first year of full-time study I prepared and submitted my colloquium paper, the basis for my confirmation of candidature. My paper included a substantial discussion of the literature I had read relating to language and power, together with a somewhat briefer discussion of my proposed methodology. The brevity and lack of detail provided on methodology reflected the fact that, despite all my reading, I had not yet identified a methodology that would support my research project. While I had selected a number of research methods, I had not identified the one ‘big theoretical perspective’ (Wolcott 1992, p.8) that would
Institutional ethnography: Mapping the social relations of VET

provide a coherent theoretical structure for my research. As a beginning researcher I began to feel that I had lost my way along pathways I was unable to discern (Wolcott 1992, p.10).

In response to my evident difficulties, a member of my colloquium panel suggested that I explore the work of Dorothy Smith. My introduction to institutional ethnography was through three of Dorothy Smith’s works (1987, 1990b, 1999b), and my initial response combined frustration and excitement. Frustration because her theory and method are not easy to grasp, particularly for a beginning researcher who had no access to a group of established institutional ethnographers (Campbell 2003; Campbell & Gregor 2002, p.4; Spence 2002). Dorothy Smith’s writing is described as ‘dense’ (Campbell 2003; DeVault 1999, p.11), and her work has been accused of unintentionally ‘using language as a form of social closure’ (Spence 2002, p.37). Like Marjorie DeVault (1999, p.11), I copied out long extracts from my reading and wrote lists of questions, in the hope that physically engaging with the texts might help me find an entry point.

And yet… and yet… there was something. A quiet sense of excitement that here at last was an approach to research that would allow me to use my disquiet as a starting point, to explore power relations that I sensed existed but which were not visible, and to produce a report that would encourage debate and support moves for change. Once I began reading Dorothy Smith’s work I could not put it aside until I’d found my way in.

My entry into institutional ethnography was supported by a series of fortuitous events, initiated to some extent by my decision to put my emerging ideas out for comment. As an off-campus student located on the opposite side of the Australian continent to my supervisor and faculty, I actively sought out opportunities to engage in discussions with other researchers in my field. In late 2003 I took up an opportunity to present at a postgraduate research conference hosted by a university in my home city (Grace 2004d). My paper was largely based on my emerging research questions, and represented my first attempt to reframe these using the theoretical frameworks I was drawing from my reading of Dorothy Smith.
My participation in the conference provided a valuable opportunity to engage in discussion with other postgraduate researchers. One such discussion not only led me to Marie Campbell and Ann Manicom’s (1995) edited collection of institutional ethnography essays, it also alerted me to an imminent visit by Dorothy Smith as keynote speaker at another local university conference. I attended, and the keynote presentation addressed some emerging questions I had about my research. I also had the opportunity to speak with Dorothy Smith during the conference, and our brief conversations affirmed for me that institutional ethnography had much to offer as the conceptual framework for my study. As 2003 drew to a close I reflected on the extraordinary developments in my research project following a seemingly incidental decision to present a paper at a postgraduate research conference.

As 2004 progressed the references listed in Marie Campbell and Ann Manicom’s (1995) edited collection introduced me to a body of literature written by institutional ethnographers who had conducted a range of studies in a variety of contexts. I was particularly excited to find Nancy Jackson’s (1995) paper on the social organisation of knowledge in competency based vocational training. In preparing for my colloquium I had read other papers in which Nancy Jackson explored the Australian VET sector’s adoption of competency based training (1993a, 1993b). To open a collection of papers on institutional ethnography and discover one written by a researcher whose work was already familiar from my reading of VET literature established a connection that affirmed my growing confidence that institutional ethnography would support my own study.

I no longer felt that I was working alone; in addition to Dorothy Smith’s own works I now had access to a body of work about institutional ethnography, and reports from institutional ethnography studies. In moving between this literature and Dorothy Smith’s own writing I became more confident in my understanding of institutional ethnography and began to see how I could use this approach in my own study. More importantly, this literature also helped me to develop a whole new understanding of my research questions.
While recognising that it would have been advantageous to have an understanding of institutional ethnography before commencing my research project, I found that my later discovery of this approach need not preclude me from adopting institutional ethnography as the conceptual framework for my project. There were strong resonances between institutional ethnography and the research plan I had developed. My project had its origins in a powerful sense of disquiet and disjuncture that I experienced as a practitioner; I set out to explicate this, taking the side of my informants; my research was framed from the standpoint of VET practitioners whose voices are largely silenced within VET policy debates; and I wanted to draw on local experiences to explicate how local learning and assessment practices are shaped by regulatory texts.

Much of what I had previously written about my methodology was an attempt to ‘answer for every deviation’ of my own research from the practices of established methodologies that I had explored and rejected (Campbell & Gregor 2002, p.56). Institutional ethnography provided a coherent framework that aligned with much of the research plan that I had already developed and had begun to implement. I came to understand that the primary change I needed to make was to think about my project differently. The key to achieving this was to understand institutional ethnography’s use of the concept ‘problematic’.

In some approaches to sociology, the ‘problematic’ for research is based on theoretical questions and concepts that give rise to a hypothesis or a set of questions for study (Grahame 1998, p.350 & p.359; Smith, D.E. 1987, p.91). In institutional ethnography ‘problematic’ is a technical term, a conceptual tool for research. It is used ‘to direct attention to a possible set of questions that may not have been posed or a set of puzzles that do not yet exist in the form of puzzles but are “latent” in the actualities of the experienced world’ (Smith, D.E. 1987, p.91).

In my original research proposal I outlined a research topic that focused on the use of an excluding language form in Training Packages, and my proposal reflected the way I explained that topic as a VET practitioner who worked with Training Packages. This is the research topic for my study, but it is not my problematic. The problematic in institutional ethnography is neither the research topic itself, nor the research problem as
someone in the site being studied might explain it (Campbell & Gregor 2002, pp.46-49). The research topic identifies an area of everyday experience, something that is happening in the everyday world. In the process of investigating that topic the researcher begins to identify how the practices being studied happen as they do, and this draws attention to questions that are not being asked. By focusing on those questions and looking for ‘what is going on’, a problematic begins to emerge, and this is crucial to an institutional ethnography study (Campbell & Gregor 2002, p.47).

My research topic identified the language of Training Packages as the area of everyday experience being explored in my study. As I investigated this area of experience I quickly developed a sense that underlying the issues that were apparent on the surface there was ‘something going on’ (Campbell & Gregor 2002, p.47; Smith, D.E. 1999b, p.9). Exploring issues surrounding practitioners’ engagement with the language of Training Packages began to uncover the hidden role being played by the regulatory framework of VET. This was an emerging theme in my interview data, and while I was not consciously looking for it when I set out, this theme kept appearing and would not go away. I initially saw this as a shift in focus; but as I began to think differently about my project I realised that these emerging issues were not a distraction, they represented my research problematic and as such were fundamental to my project. My disquiet about the language of Training Packages provided an entry point, and is still at the heart of my research project. I came to understand that simply rewriting Training Packages in more accessible language might make them easier to read, but it would not resolve the underlying issues. There are more fundamental questions at stake.

**Conclusion**

This chapter has outlined how and why I decided to undertake my research as an institutional ethnography study. From the outset I wanted to use my research to explore practitioner disquiet about the use of an excluding language form in national Training Packages. Neither the conceptual frameworks that inform VET policy, nor the critical literature on language and power, would allow me to explore the inconsistencies, dilemmas and contradictions that give rise to a strong sense of disquiet and disjuncture shared by practitioners at the local level of VET. Institutional ethnography allowed me
to use practitioner disquiet as a starting point to explore how local workplace learning and assessment practices are put together and how they are tied into the wider social relations of the national VET sector. The following chapter will explain how, through investigating the language of Training Packages, I identified a problematic that brought into view the ruling relations of VET that organise, but are not visible in, local sites.
Chapter Three: Language and Training Packages: From a sense of disquiet to a research problematic

Introduction

The preceding chapters introduced the VET sector as the context for this study, and institutional ethnography as its conceptual and methodological framework. This chapter will describe how investigating my disquiet about the language of Training Packages brought into view the extralocal processes that organise what is happening in local sites. It will introduce three related themes that emerged within a research problematic which allowed me to explicate the role of the VET regulatory framework and its impact on local practice. The chapter will begin with an historical account of my personal and political views on language, and my response to the emergence of an increasingly complex and excluding language form as the institutional language of VET.

A growing sense of disquiet

The sense of disquiet that eventually gave rise to this PhD research project actually had its origins in the late 1970s, although at the time I did not realise where it would lead me. Having learned in high school to love the rich but complex language of Shakespeare, as an undergraduate student I found myself living in an inner city multicultural community where, among the several languages spoken by each of my neighbours, the common language of the community was Greek. On hot summer evenings the residents of our street would gather in front yards to eat freshly baked bread and swap news of the day. As a monolingual speaker of English I was relegated to sitting on the front steps talking with the children.

My status was very different when neighbours received official correspondence from government agencies, insurance companies, or legal firms. On these occasions I was called in to interpret – from the institutional English unquestioningly used by those in authority, to the vernacular English used by my neighbours. Even confident users of everyday spoken English were defeated when it came to the bureaucratic and legalistic terms that characterised official texts. There was a tangible sense of ritual about this
Language and Training Packages: From a sense of disquiet to a research problematic

process. I would enter a home to find the most comfortable chair drawn slightly forward with a small side table carrying a selection of snacks, a jug of water, and a tumbler of clear aniseed spirit that had a kick like a mule. I would be settled in the chair, encouraged to have a bite to eat and a sip of spirit, and then I would be presented with the letter to be translated.

After a particularly confronting encounter with a full-page acknowledgment letter that read like the formal onset of hostilities, my neighbour held the letter up, looked me in the eye, and challenged me with, ‘Why they write like this?’ I didn’t have an answer; at least, not one I was comfortable expressing. I wanted to shout, ‘They write like this because they have no respect, because they don’t care, but above all they write like this because they are full of their own importance and want to remind you of your ‘place’ in the Australian community!’ Instead I sat silent. In that moment I was ashamed to be a speaker of English. My neighbour’s question, and the impression it left, has stayed with me ever since. The two years in which I lived as a member of that community gave me an insight into how a language form that I barely notice actively marginalises and excludes others. Subsequently, over a sixteen year career in the Australian public service, I developed a reputation for ensuring that my written and oral communication with clients was clear, meaningful and used accessible language, even as I developed a particular skill in working with the formal bureaucratic language typical of government documents.

Fast forward to the 1980s, and I was working as the staff development officer for a regional office of the then Department of Employment, Education and Training (DEET), which was a key player in the National Training Reform Agenda (NTRA). Staff members within DEET found ourselves positioned to lead the way in various NTRA reforms including the use of national competency standards. In our case the relevant standards were the Joint Australian Public Sector Training Council (JAPSTC) core competencies, and they were like nothing I had ever encountered before. I vividly recall sitting at my desk, thoroughly bewildered, poring over the JAPSTC competencies and wondering, ‘What on earth do these *mean*, and *what* am I supposed to do with them?’
Prior to this, workplace competencies and learning outcomes were expressed in terms such as: ‘Develop and write an appropriate CMAA with a client’ (ASO4 Case Manager Skills Survey 1994, p.3). They used professional jargon (complete with acronyms), and while they would be meaningless to people external to our organisation they were readily understood by staff members whose role included writing Case Management Activity Agreements (CMAAs). With the introduction of national competency standards the knowledge and skill for this role was subsumed into a combination of two JAPSTC core competencies: ‘Convey information and ideas to people’, and ‘Develop workable solutions’ (Core Competencies 1992, p.11 & p.20). The language was clearly different. I could read those words and understand what they said but still be left wondering what they actually meant. How was I, as a staff development officer, to apply these abstract performance standards to the job roles carried out by the staff members I worked with?

Initially the JAPSTC competencies operated behind the scenes, and only staff development personnel had to deal with them. I continued to conduct learning activities using workplace vernacular, but when I entered these activities into the personnel record they were coded against the relevant JAPSTC competencies. Over time the JAPSTC competencies began to permeate the organisation, becoming the formal basis for a range of interactions between staff and supervisors, and staff members at all levels were progressively required to deal with them. When staff members confronted with this language for the first time reported the same bewilderment I had initially experienced, I responded by rewriting the JAPSTC competencies into the vernacular of our workplace to produce a local version that was accessible to the people who had to work with them.

Now when I read the JAPSTC competencies I don’t find them particularly difficult to understand. They are extremely abstract and generalised, and yet the words themselves are largely familiar and they generally use active voice. As the system of national competency standards expanded and was progressively integrated into national Training Packages, competency standards remained abstract and generalised but they increasingly used complex and unfamiliar words and passive voice became the norm. These changes significantly increased the difficulty of working with these texts. In 2005, I am now working with Training Package competency standards that are in their second or third
iteration and my practice still involves rewriting them into workplace vernacular to make them accessible to people in local sites. Today it is fellow VET practitioners and participants who challenge me to explain ‘Why they write like this?’ I still don’t have an answer but I have long suspected that there is something happening here that involves underlying issues of power and exclusion.

After leaving my position with DEET in 1996 I worked in a range of learning contexts including TAFE colleges, private and industry RTOs, in classrooms, training rooms, workplaces and flexible delivery programs. Throughout my experience I found that most of my participants, and quite a few of my colleagues, routinely struggled with the language of national competency standards. In these local sites I repeatedly saw ‘[r]eal people really get hurt’ by the unquestioned use of an excluding language form (Gee 1996, p.ix). When I expressed my disquiet about this language the typical response from VET officials constructed these issues as individual language and literacy deficiencies. Prior to 1999 I worked in a regional area where nearly half the adult population had left school before 16 years of age (ABS 1998, p.282), and in an industry where low literacy levels were explicitly identified as an industry training need (FIFWA 1997, p.10). While I was far from convinced that individual literacy deficiencies on their own were sufficient explanation for the issues I was confronting, at the time I had no evidence on which to challenge this argument.

In 1999 I moved to a metropolitan area where I found myself increasingly working in industries where employees used complex language and concepts in their everyday work, and with adults who were undertaking VET qualifications having already attained university qualifications. Even these people typically struggled with the language of national competency standards, which were now incorporated into Training Packages. I found it difficult to accept that someone who had demonstrated the language skills required to succeed at postgraduate level in fields such as management and education did not have the language skills required to succeed at Certificate IV or Diploma level within those same fields. At the same time, I became actively involved in a number of VET professional associations and networks where I interacted with other VET
Language and Training Packages: From a sense of disquiet to a research problematic

practitioners who expressed the same disquiet I had long been expressing and who, like me, were dissatisfied with the standard answers.

My change of role and location in 1999 also gave me greater access to VET policy discussions and documents. At the same time as I was becoming aware of widespread practitioner disquiet about the language of Training Packages I also began to recognise a corresponding silence in official VET texts. Over time I participated in a number of official meetings and consultations in which practitioners raised their concerns about the use of excluding language. Such concerns were typically treated as a side issue and discussion of them quickly brought to a close with the group being guided back onto the topics and time allocations set out in the formal agenda. In each case the issues of language introduced by practitioners were omitted from the subsequent official record of discussion. At a system level the language was simply not seen as an issue for discussion or debate.

The combined effect of the ongoing struggle on the part of my participants, increasing resistance and disquiet amongst my VET colleagues, and silence in the VET literature gave rise to a powerful sense of disquiet that I could no longer ignore. There was clearly something going on here. I began confidently speaking out in meetings and putting issues of language on the table. When an opportunity came up to apply for candidature and a scholarship to undertake a PhD research project, the prospect of having access to the time, funding, academic support, and literature to explore this issue further was simply too good to pass up. I initially defined my research topic as: ‘Language and power in Vocational Education and Training’, with particular emphasis on the way language is used in Training Packages and the impact this language has when Training Packages are used to support workbased learning and assessment.

What is happening here?

In the early stages of my research project, I focused on addressing the silence I had identified in the VET literature. While I recognised the need for critical analysis, rather than just description and interpretation, at the outset I still saw myself using my research to make a case that the language of Training Packages is dysfunctional and that it arises
Language and Training Packages: From a sense of disquiet to a research problematic

out of and reinforces unequal power relationships. My research questions at this stage related directly to the language of Training Packages: do other practitioners see this language as inappropriate? What characteristics make it inappropriate? What impact does it have on VET practitioners and participants?

Having framed my initial interview questions around the language of Training Packages I quickly developed a sense that the data to support this limited focus would be extensive. Talking informally about my research with VET colleagues, and conducting early interviews for the pilot phase of my fieldwork, I found that the indicators of concerns about this language were almost overwhelming. I even found recognition of this issue scattered through the VET literature (Adams & Holden 1998; Del Grosso & McKenna 2000; Mawer & Field 1995) although rarely as the primary focus of any particular research study. I had a growing sense that there were more fundamental questions that I needed to be asking.

Confronted with an abundance of data that strongly indicated that the language used in Training Packages makes them difficult to understand, undermines the confidence of practitioners and participants alike, and in some cases even acts as a barrier to access for people wanting to engage with accredited vocational training, three related issues began to emerge. The first issue related to the level of local practice. Asking ‘what is happening here?’ gave rise to a series of questions about the use of an excluding language form in texts that provide the basis for assessing workplace performance. What happens when an employee who is acknowledged to have a level of expertise in their job role is not able to recognise themselves or their skills in the performance standards that relate to that job role? Do individuals find a way around the barrier created by the language, or are they in effect denied access to learning and assessment? When there is an apparent discrepancy between the requirements of the Training Package standard and the established practices of the local workplace, which takes precedence? These questions are not yet being asked in VET yet they are latent in the operation of Training Packages as national texts. Through the ongoing process of reflecting on the early data, discussing my research with my supervisor and colleagues, and exploring the literature on institutional ethnography, one aspect of my problematic came into view: how is local
Language and Training Packages: From a sense of disquiet to a research problematic

workplace practice socially organised and shaped by the use of external Training Package standards as the basis for making judgements of competence? This is the first theme in my research problematic.

The second theme to emerge also related to the level of local practice. Once again, evidence that the language of Training Packages is not appropriate for use in workplace learning and assessment programs led to questions about why this language continues to be used in these contexts. Why do VET practitioners who consider this language to be inappropriate continue to use it when dealing with participants? Why don’t they simply recast the language of the national texts into vernacular that is understood by the participants they are working with? Exploring this question brought into view a range of questions about the impact of Australian Quality Training Framework implementation and the authority that VET practitioners have to use their professional judgement in making decisions about local learning and assessment practices. The second aspect of my problematic came into view: how is local learning and assessment practice socially organised and shaped by the use of external Australian Quality Training Framework standards as the basis for making judgements about compliance?

The third aspect of my problematic emerged in a similar manner. In the face of so much readily available data raising significant concerns about the language of Training Packages, I became interested in how the corresponding silence in the VET literature is maintained. Some informants in early interviews talked about their own involvement in VET consultation processes in ways that suggested that they had little expectation that their contribution would make any difference to the outcome. It was serendipitous that my research project coincided with formal reviews of three key components of the VET regulatory framework: Training Packages, the AQTF, and the national qualifications for VET practitioners. As a practitioner seeking to engage with each of these consultation and review processes I could see my contribution being structured in particular ways. As I continued reading the institutional ethnography literature I began to recognise the significance of this. The questions that I found arising at this level included issues such as: how do issues that are visible at the local level disappear at institutional level? How is it that VET practitioners know exactly what they are talking about when they say ‘this
Language and Training Packages: From a sense of disquiet to a research problematic

language is excluding people’, but those in positions of authority simply can’t see any problem? A turning point in my understanding of these issues was reading Dorothy Smith’s explication of two texts that formed the basis of a debate about the ‘chilly climate’ experienced by women in the political science department of a Canadian university (Smith, D.E. 1987, pp.195-223). That analysis explored how issues of sexism and racism that were clearly visible to and recognised by women in the academy were invisible to male colleagues, and how attempts by women to raise these issues at institutional level were suppressed. My understanding eventually took shape as the third element of my problematic: in a regulatory framework that sees local practice connected to national policy agendas, how are VET practitioners positioned in decision making and policy development?

Three elements within the same problematic

Drawing these themes together I came to understand them as three aspects of the same problematic. Using disquiet about the language of Training Packages as my entry point, my research project seeks to explicate how ruling VET texts shape and organise experiences and practices in local workplace settings, and how practitioners are positioned in decision making at the level of local practice and at VET system level.

The language of Training Packages: More than an entry point?

Having identified a problematic that asks fundamental questions about the social relations of VET, where does this leave my original questions about the language of Training Packages? Reflecting on my experience as a practitioner, I could imagine many specific entry points that would lead an analysis to explicate the problematic that I have identified. My entry point was the language of Training Packages, and there was (and remains) a reason for choosing this focus.

Many VET practitioners and participants have contributed to this study. Some contributed as informants, while many others along the way contributed ideas, suggestions, discussed my emerging ideas over coffee, forwarded to me examples of language they have encountered, or ran conference workshops in which they shared their
own disquiet about language. All these people contributed to a PhD study that looked at the language of Training Packages. The silence in the VET literature remains, and while explicating the social relations which support this silence is essential, as a practitioner I still see a need to begin addressing the silence itself. While acknowledging that ‘the purpose of institutional ethnography is to explore everyday life not to theorize it’ (Campbell & Gregor 2002, p. 50 [emphasis original]), I feel that this research study needs to do both. To do otherwise, to use the language issue only as the entry point that brought my problematic into view, would be to do that which I have criticised in other VET research: acknowledging concerns about language while moving on to other questions that are seen as more interesting, important or relevant.

As a result, I planned and have used the fieldwork and data from this study to support two purposes. Through a series of workshops and conference papers I have directly challenged the VET literature’s silence about the language of Training Packages (Grace 2003, 2004a, 2004b, 2004c, 2004e). This was an integral part of my original objective, and I will continue to use data from this study to pursue it. The second purpose is the one that emerged as my problematic came into view. The primary objective of this thesis is to explicate aspects of ruling in VET. This objective will be pursued in the chapters that follow, and has also been addressed in several published papers (Grace 2004d, 2005a, 2005b).

**Conclusion**

This chapter has described how my long standing commitment to using meaningful language led me to question the use of excluding language in the early days of the National Training Reform Agenda. As the VET sector developed and the language form used in national texts became ever more complex and difficult to understand, my sense that there was something going on grew. I set out to do a PhD research project that challenged the way language is used in national Training Packages, and exploring this issue brought into view three related issues. How is local workplace practice socially organised and shaped by the use of external Training Package standards as the basis for making judgements of competence? How is local learning and assessment practice socially organised and shaped by the use of external Australian Quality Training
Framework standards as the basis for making judgements about compliance? In a regulatory framework that sees local practice connected to national policy agendas, how are VET practitioners positioned in decision making and policy development?

These three themes are three elements of my research problematic, which explicates how experiences and practices in local workplace settings are shaped and organised by ruling VET texts, and how VET practitioners are positioned in local decision making and VET system policy development. Each of these themes will be explored in the discussion and analysis chapters that appear later in this thesis. Before moving to that exploration, the following chapter will provide an account of the research methods I used in generating and working with two levels of data: interview data that provided entry to local sites, and texts that revealed how those local sites are organised through the ruling relations.

**Where the Transport and Distribution Training Package says:**

- Required clearances are compared to available space and adjustments made

**Someone working in the industry might say:**

If you’re moving this box over there can you fit through that space? If not, what do you have to move to be able to get through?

Figure 2: Training Package language and workplace vernacular: Extract from Unit TDTD197B ‘Shift materials safely using manual handling methods’
Chapter Four: Interviews and texts: Levels of data in a project of archaeology

Introduction

This chapter describes the research methods used in this study. It will outline some of the particular strengths of my study, and will acknowledge some minor constraints. Interviews with practitioners and participants involved in workplace learning and assessment provided entry into local sites in which Training Packages are activated. Examination of texts drawn from the vast library of official VET reports, policy statements, procedural advice and practice guidelines revealed how those local sites are coordinated and connected to national government agendas. Feedback from conference presentations, practitioner workshops, published papers and discussions with colleagues, while not providing data as such, kept the research grounded in the reality of everyday VET practice. The chapter will begin with an account of the particular strengths my study derived from its status as an independent practitioner research project conducted in a political environment in which research is often aligned to government policy.

An independent project in a political environment

I planned and conducted my study within a climate of ongoing debate about the status and role of research in VET. While some commentators argue that government funding has created a ‘world class VET research capacity’, (Smith, A. 2003, p.vii) others argue that VET policy development has historically taken place ‘largely in a research vacuum’ (Butterworth 1994, p.33), and that current VET research is aligned to government policy and subject to political interference (Kell 2001, p.4). Within this climate, my position as a VET practitioner conducting an independent research project to explore a sense of disquiet that is shared by other practitioners gave my study a particular strength. Peter Kell argued that:

Research being developed and directed exclusively to an industry and government constituency runs the risk of preventing a meaningful interface with the practitioners and teachers in the VET system. This is a major issue in VET research, where the NTRA has been responsible for the disenfranchisement of VET teachers from many aspects of their professional role. The extent to
In my study, not only was I free to challenge established VET approaches to language, but my informants participated as individuals rather than as authorised representatives speaking on behalf of identifiable VET organisations. The challenge was to develop and carry out a research plan that built on these strengths.

**Research methods in institutional ethnography**

Institutional ethnography is ‘always subject to revision and the improvisation required by new applications’ (DeVault & McCoy 2001, p.752). While institutional ethnography involves adopting a particular orientation to the issues being investigated, there is no prescribed sequence of research activities (Campbell & Gregor 2002, pp.45-46). Marjorie DeVault and Liza McCoy (2001, p.755) outlined the following broad structure for an institutional ethnography study: ‘(a) identify an experience, (b) identify some of the institutional processes that are shaping that experience, and (c) investigate those processes in order to describe analytically how they operate as the grounds of the experience’.

A range of data collection methods can be used in institutional ethnography, including interviews, focus groups, observation of work practices, document analysis, and reflection on the researcher’s own experience (DeVault & McCoy 2001, pp.755-756). In view of the wide range of topics that can be investigated using institutional ethnography, methods for data generation and collection have been identified as ‘basically whatever makes those topics available for analysis’, and studies may use a wide or narrow range of data collection techniques (Campbell & Gregor 2002, p.61). My study used interviews and examination of documents.

Marie Campbell and Frances Gregor (2002, p.7) stated that ‘learning institutional ethnography commits researchers to a particular way of looking. There is something distinctive not only about how the institutional ethnographer looks at the world but what she looks for’. To conduct my research project as an institutional ethnography study I adopted a particular way of thinking, described by Dorothy Smith as thinking
Interviews and texts: Levels of data in a project of archaeology

While my research methods have much in common with those used in qualitative research more widely, I approached both the methods themselves and the data they generated in particular ways.

**Two levels of data**

An institutional ethnography study typically identifies an area of experience or everyday practice and explores or ‘explicates’ the institutional processes shaping that experience (Campbell & Gregor 2002, p.59; DeVault & McCoy 2001, p.755). Marie Campbell and Frances Gregor described the notion of explication as the ‘analytic core’ of institutional ethnography research: ‘researchers begin in the everyday world, collect data about it, and proceed to explicate a problematic by going beyond what can be known in any local setting’ (Campbell & Gregor 2002, p.59). Explication involves two levels of data: ‘entry-level data’ gathered in local settings, and ‘level-two data’ that provides organisational detail about how the activities at local level are organised by social relations beyond the setting (Campbell & Gregor 2002, p.60).

In my study, ‘entry-level data’ was generated through interviews and ‘level-two data’ through examination of official texts.

**Interviews as ‘entry-level data’**

I approached my research project aware that VET practitioners actively debate and discuss the language of Training Packages. When practitioners gather to perform almost any function relating to the use of Training Packages, whether this involves planning, conducting, reviewing, evaluating, moderating or validating learning and assessment activities, the language of the Training Package spontaneously emerges as a topic for discussion. Elsewhere I have described these as conversations that take place ‘below the surface’ of VET (Grace 2004c, p.170). These conversations suggested that the language of Training Packages is a topic that represents a meaningful category in the lives of VET practitioners, and that using interview techniques to ‘create space for respondents to
provide accounts rooted in the realities of their lives’ (DeVault 1999, pp.62-63) would provide a rich ground for generating data.

**Selecting a local setting**

One option was to conduct fieldwork within a single organisation, conducting a detailed exploration of local practices as they are enacted in a specific site to bring into view how those local practices are connected to, and socially organised by, the national texts that make up the VET regulatory framework. This approach is evident in a number of institutional ethnography studies including Roxana Ng’s (1988) study of the impact of government funding on a community based employment agency, Nancy Jackson’s (1995) investigation of the introduction of competency based curriculum in a vocational college, and Marie Campbell’s (1998) study of a total quality management system in a long term care facility.

Within the political and policy context of VET I had doubts about using this approach for my own study. Conducting fieldwork within a particular Registered Training Organisation would require the support of organisational management, and would entail a risk that those granting permission for access may seek to influence the research. This influence can be manifest in a number of ways. In some cases organisational managers perceive that their ‘broad’ view is of greater value to the research process than the ‘narrower’ views held by staff members (Campbell & Gregor 2004, pp.64-65). Within VET this privileging of particular views can occur through management nomination of informants who are authorised to speak on behalf of the organisation, and who may therefore be constrained to express views that the organisation would endorse. In some cases organisations participating in research have an expectation that the research findings will have immediate practical utility for the organisation itself, resulting in ‘extensive negotiations that lead to the compromising of ideals’ (Brown & Hodges 2003, p.4). An additional concern was that the highly competitive VET sector, combined with a culture of showcasing ‘best practice’ (Jasinski 2003), can make organisations resistant to research that might publicly expose shortcomings in their practices and procedures. My prior research experience includes instances where gaining access to staff and
records was conditional on management reviewing research publications to ensure that nothing emerged from the study that would reflect poorly on the organisation.

There was also some question about whether individual employees would understand their right to freely grant or withhold consent to participate in my research if their participation appeared to be linked too directly to their employment or their involvement in a given learning or assessment activity. Organisational consent would indicate some level of management support. While gaining formal support from informants’ supervisors can be an advantage in seeking voluntary participation (Campbell & Gregor 2002, p.65), I remained concerned about the risk of employees interpreting organisational support as an expectation that they participate.

Another consideration in my choice of research setting was my desire to acknowledge the diversity of practices being enacted across different VET sites. While national texts such as Training Packages and the Australian Quality Training Framework apply across the full range of contexts and participants within the broad and diverse VET sector, discussions at practitioner level often draw attention to significant differences between local practices adopted in different sites. I had a sense that an analysis based on examination of local practices within a single RTO would only provide a partial view of how national texts act to socially organise practices enacted across different sites. At the outset this was little more than a hunch. As my research progressed, differences between local sites did indeed emerge as a significant issue in my study.

As I developed my research plan I set out to build a picture of the ruling relations of VET in the widely different contexts in which they operate. To support this, I decided to conduct interviews with VET practitioners and participants who could offer a diversity of experience, contexts, and perspectives (DeVault & McCoy 2001, pp.757-761). This goal was matched by the wide range of informants who expressed interest in participating in my research project, some of whom wanted to speak from across a wide range of organisations and experience.
Selecting informants

I set out to interview people who dealt with Training Packages in everyday learning and assessment activities conducted in or connected to workplace settings. My early research plan confidently separated potential informants into three groups: ‘VET practitioners’ were directly involved in planning and conducting local workplace learning or assessment activities; ‘VET participants’ had participated in workplace learning or assessment activities; and ‘VET organisation staff’ were involved in developing, implementing, and managing Training Packages or VET policy at national or state level. This careful planning and neat categorisation was quickly disrupted by the complexity and diversity of VET, and on reflection the only surprising aspect of this development was that I had ever anticipated that such neat but contrived categories would stand.

VET personnel perform a wide range of roles across a diverse range of contexts, often moving confidently between roles and contexts (Smith, E. & Keating 2003, p. 230). This diversity quickly emerged in my study. Of the twenty-seven VET personnel interviewed, only ten indicated that, at the time of interview, they were employed full-time in a single role that they had performed over a number of years. The remaining seventeen indicated that they had moved through a variety of roles throughout their career, often working part-time across a number of different roles concurrently. In several cases this involved moving between roles that involved planning and conducting learning and assessment and roles that involved developing, implementing, and managing Training Packages at national or state level. This rendered my anticipated distinction between ‘VET practitioners’ and ‘VET organisation staff’ increasingly difficult and ultimately unsustainable, and throughout this thesis I refer to all these informants as ‘VET practitioners’.

My anticipated distinction between ‘VET practitioners’ and ‘VET participants’ was similarly blurred. Under the AQTF standards for RTOs, VET practitioners are required to hold formal VET qualifications both applicable to their learning and assessment role and also relevant to the particular industry Training Package they are working with (ANTA 2005f, p.9). There is some provision for staff to either demonstrate equivalent competence or to work under supervision, but the bulk of my practitioner informants
typically held the Certificate IV in Assessment and Workplace Training plus whatever industry qualifications they were involved in delivering or assessing. In practice this meant that some of the VET practitioners who participated in my study also wanted to comment from their experience as VET participants. In three cases practitioners felt so strongly about their recent experience as participants that they volunteered to be interviewed primarily on this basis. This meant that the distinction I initially made between ‘VET practitioners’ and ‘VET participants’ was not as clear as I originally anticipated, although it did not become unsustainable.

Who were the informants?

A total of thirty-three interviews were conducted. Twenty-seven informants were interviewed as VET practitioners, with two individuals from this group also speaking about their experience as VET participants. Six informants were interviewed as VET participants, with three individuals from this group also speaking about their experience as VET practitioners. Of thirty-three informants, seventeen were self-selected volunteers who approached me after hearing about my research, and sixteen were people with whom I initiated contact.

Interviews were conducted with informants located in New South Wales, Queensland, Western Australia, South Australia, and the Australian Capital Territory. The roles performed by VET practitioner informants included planning and conducting learning and assessment programs, developing and reviewing Training Packages and national support materials, developing and administering VET policy at national or state level, conducting research projects and consultations at national or state level, providing advice to industry, and conducting and overseeing AQTF audit processes. Informants had worked in learning and assessment or managerial roles in publicly funded TAFE colleges, private and enterprise RTOs, small independent consultancies, industry bodies, and VET policy and regulatory agencies at national or state level.

VET practitioners in my study had worked with the following Training Packages: Animal Care and Management; Assessment and Workplace Training; Asset Maintenance; Asset Security; Beauty; Business Services; Chemical, Hydrocarbons and
Oil Refining; Community Services; Conservation and Land Management; Film, TV, Radio and Multimedia; Financial Services; Food Processing Industry; Forest and Forest Products Industry; General Construction; Health; Hospitality; Information Technology; Metal and Engineering Industry; Metalliferous Mining; National Public Services; Property Development and Management; Public Safety; Rural Production; Telecommunications; and Transport and Distribution.

Of the informants interviewed as VET participants, four had acquired Training Package qualifications either by completing a program of learning and assessment or by Recognition of Prior Learning (RPL); one was undertaking a program at the time of interview; and one had investigated RPL but decided not to proceed based, in part, on the language of the Training Package. The qualifications involved included Certificate III, Certificate IV and Diploma qualifications in the Training Packages for Assessment and Workplace Training, Business Services, and Health.

**Recruiting VET practitioners**

Recruiting VET practitioners for my study was quite straightforward. I am an active member of a number of professional associations and practitioner networks. As word of my research spread I was approached by volunteers who were keen to participate, and by the time my research plan was approved I had a list of prospective informants waiting to be contacted. Throughout my fieldwork I adopted a simple practice of publicly announcing my research at VET practitioner gatherings and inviting anyone who was interested to contact me for more information. As my research progressed I began presenting at VET practitioner events and research conferences, and I concluded each presentation with a similar announcement and invitation.

Through this strategy I was contacted by a number of potential informants. In addition, I also approached a number of VET practitioners who were known to me either personally or by reputation and who I believed might offer a perspective different from those I had already gathered. While I was interested in interviewing people who shared my own disquiet about the language of Training Packages, my project was not intended to be a study of the disillusioned and the disaffected; I also sought out informants who would
challenge my own thinking on this issue. In this way I gathered ‘multiple narratives arising from different locations’, allowing me to build more of a three-dimensional view of the VET system (DeVault 1999, p.50).

**Recruiting VET participants**

Recruiting VET participants for my study was always going to be more difficult than recruiting VET practitioners. My original plan to make contact with participants through VET practitioners who worked with them ran into an unresolvable contradiction between the text based requirements of my university ethics committee and those of the AQTF standards for RTOs. To ensure anonymity and free consent, my ethics committee specified that I ask VET practitioners to nominate participants who I could approach as prospective informants, but that I was to specifically request that the practitioners not approach the participants on my behalf. Under the AQTF and national privacy legislation VET practitioners were not allowed to nominate participants unless they had approached the participants and obtained permission.

As a result, the only VET participants I was able to interview were those with whom I could establish contact by some other means. Through the assistance of work contacts, friends, casual acquaintances, and a few members of my practitioner networks who had recently acquired their own Training Package qualifications I eventually interviewed six informants as VET participants.

**Conducting the interviews**

As I identified potential informants, I sent each information about my project then followed up to agree mutually convenient arrangements for those who confirmed their willingness and availability for interview.

While my initial research topic focused on language and Training Packages, I was not interested in examining the language of these texts as somehow being independent of the local sites in which they are implemented. I was interested in the impact of this language as individuals interact with Training Packages in particular local sites. To this end, my interviews set out to explore these texts as ‘situated in the local courses or sequences of
Interviews and texts: Levels of data in a project of archaeology

action in which they are read and come into play’ (Smith, D.E. 1999a, p.74). Interviews were loosely structured around a number of broad questions developed from a combination of my own experience, the initial literature review, and informal discussions with other VET practitioners. Informants were provided with these broad questions in advance, but rather than using the questions as the basis for a formal question and answer interview structure, they were used to indicate areas of interest. Interviews were conducted in a conversational manner, described as ‘talking with people’ (DeVault & McCoy 2001, p.756). Informants were invited to talk about their experiences with, use of, and views about the language of Training Packages. One informant described our discussion in the following terms:

… we’re sitting around with a cup of coffee and we’re discussing things. (Mark)

Early interviews largely reflected my initial research focus on the characteristics of Training Package language and its impact on VET participants. As the fieldwork progressed and the focus of my research broadened, later interviews explored avenues and themes that emerged in earlier interviews (DeVault & McCoy 2001, p.757).

Exploring the nature of Training Package language gave rise to questions about how and why practitioners use this language in their everyday work. This, in turn, generated questions about how the regulatory texts of VET shape learning and assessment practice and impact on the professional authority and autonomy of VET practitioners. Exploring questions about how Training Packages come to be written in this language despite the disquiet of practitioners brought into focus questions about the positioning of practitioners in VET consultation and decision making processes. In cases where informants had approached me, I also provided space for them to raise whatever issues they had which had prompted them to volunteer for my study.

Professionals learn to speak within the discourse of their profession, determining which aspects of their work will become visible and which will not (Smith, D.E. 1987, pp.161-162). This talk references the discourse of the profession, framing the way work is thought about rather than revealing what is actually happening (Campbell & Gregor 2002, pp.70-71). As a VET practitioner interviewing other VET practitioners this use of
insider language did occur. In an effort to counter this I followed up issues being raised by each informant, encouraging them to be as specific as possible and to use examples or narrative stories from their own experience to illustrate points they were making. Several informants framed parts of their discussion in terms of specific Training Package units of competency that they had brought to the interview, and others referred to copies of local training materials as they spoke. For the purposes of this thesis I have been selective, and tried to include only particular interview extracts that focus on the aspects of the institutional processes in which I am interested (Smith, D.E. interview September 1999, cited in DeVault & McCoy 2001, p.770).

Several informants volunteered to be interviewed on the basis that they regarded the language of Training Packages as appropriate for its intended audience and purpose. The benefit of encouraging informants to speak using concrete examples rather than in the abstract was demonstrated in the case of one informant who for much of the interview spoke in abstract terms about the language being appropriate. Towards the end of the interview this informant moved into a detailed description of aspects of her own practice. At the point where she moved from arguing a position in the abstract to describing actual practice in detail, she stopped herself in mid-sentence and, with some surprise, acknowledged an inconsistency between the abstract view she had espoused and the detailed practice she was describing. Marjorie DeVault (1999, p.65) described this as ‘the “aha” or “click” of consciousness raising’; by exploring categories that organise my informants’ lives my study opens up topics that build from what I share with my informants and provides opportunities to develop a new way of seeing the world.

As already noted, informants were interviewed as individuals rather than as authorised representatives of particular organisations. This is a different approach to that adopted in some VET projects in which informants are interviewed as staff members of particular organisations. In some VET studies informants and the organisations they represent are named in the final report (for example, Mitchell & Young 2001; Rumsey 2002). My study stepped outside and disrupted these power relationships. In all my dealings with informants I was explicitly positioned as a practitioner who had temporarily stepped
aside from my role to research an issue that is the basis of much shared disquiet amongst practitioners. Informants in my study variously challenged current policy and practice, the structure objectives and operation of the VET regulatory framework, and my own research interests.

Marie Campbell argued that when individuals speak about, and attempt to make sense of, their everyday lives the social relations that organise their lives are ‘in’ the talk: ‘[a]ccording to Smith, it is impossible to speak sensibly without speaking the social relations’ (Campbell 1998, p.61). A significant characteristic of the interview data in my study is that informants spoke openly about the disquiet and disjuncture they experience as individuals. Some indicated that they would not have done this had they been speaking as an authorised representative of a VET organisation. While the social relations of VET were still ‘in’ the talk, there was also some element of individuals who had worked in different roles and at different levels within the VET regulatory framework seeking to identify aspects of those social relations and challenge the impact these had on local practice.

Stepping outside the normal power relationships of official VET research to explore a topic that represents a meaningful category in the lives of my informants made it easy for my informants to talk. Interviews flowed as those described by Marjorie DeVault (1999, p.63) ‘[o]ur talk happened in a way that I and my respondents knew and were comfortable with, because such conversations … are often settings for discussing this kind of work’. This provided some extraordinarily rich data for my study, data that is in many instances very different to that which might be expected in an official VET research project.

**Tapes and transcription**

With the written consent of my informants all interviews were audiotaped, an approach that allowed me to focus on the conversation rather than being distracted by note taking. Informants based in my home state of Western Australia were all interviewed face-to-face, while those in other states were interviewed by telephone and the discussion recorded by telecommunication service providers.
I transcribed all audiotapes myself. While time consuming this established my
familiarity with the material, reduced errors, and enabled me to ensure that the
transcripts were written in a way that protected my informants’ anonymity. In view of
the sometimes considerable differences between the individual views expressed by
informants and the policy views of the official positions they occupied, I took particular
care to delete or obfuscate any details that might put individuals at risk of identification.

Identifying informants by their role in institutional work processes (DeVault & McCoy
2001, p.770) was impracticable as many informants spoke from experience in a number
of different roles. Instead I identified each informant by a pseudonym, but even then
care had to be taken. 390,000 VET practitioners (Smith, E. & Keating 2003, p.230) is a
large pool of potential informants, but such is the nature of the VET sector that including
too many unedited details could significantly increase the risk of identification. For
example, unedited statements identifying an informant as the manager of a Melbourne
based enterprise RTO in the ‘widget’ industry, who played a lead role in developing
Training Package standards for the operation of left handed ‘widgets’, would potentially
invalidate the use of a pseudonym. In some cases the need to ensure anonymity involved
difficult decisions to entirely omit particular segments which, while highly illuminating,
were simply too specific. While removing this detail may impose some limits on the use
of my data for secondary analysis, I regard it as both defensible and necessary on ethical
grounds (Poland 2001, p.634).

The audiotape recordings of the interviews are still in existence, stored in accordance
with the Ethics Committee requirements of Deakin University. Full transcripts were
prepared from the audiotapes, edited only to remove elements that would identify either
the interviewee or the people or organisations they spoke about. In presenting excerpts
from the interview transcripts as exhibits in this thesis, where necessary I made some
editing changes to improve the readability of informants’ quotes while taking care to not
alter the substance of what was being said. In all transcripts ellipses (…) are used to
indicate that material has been deleted, any additions or substitutions are enclosed in
square brackets [], and italics indicate emphasis. In many cases informants formulated
narrative accounts in which they re-enacted sequences of talk, recounting words spoken
in conversations they had had with colleagues, participants, and even AQTF auditors. These re-enactments are included in the interview data, as close to verbatim as possible while omitting any identifying details. In presenting these accounts I do not suggest that they exactly match what was said in the conversations being reported; they are useful data in what they suggest about what can be said, how it is said, and how interactions between individuals are shaped by reference to external texts (McCoy 1998, pp.416-417).

**Presentation and analysis of interview data**

The interview data for this study has been used to support two purposes. My initial objective was to address the silence surrounding issues of language and Training Packages in VET. As the study evolved, my focus moved to using practitioner disquiet about the language of these texts as an entry point to explicate the ruling relations of VET. These two purposes can be addressed through the same data, but in doing this I have had to handle the data in different ways.

What makes institutional ethnography distinctive is not necessarily how data is generated or gathered, but how it is used in analysis (Campbell & Gregor 2002, p.71). Marie Campbell and Frances Gregor (2002, pp.86-90) briefly discussed the differences between the analytic approaches used in institutional ethnography and those used in various other ethnographic traditions. Data analysis in institutional ethnography is not about producing descriptive accounts, theorising or constructing meanings for how people understand their lives, or looking for ways to generalise individual experience. In institutional ethnography data analysis aims to ‘explicate the ruling relations that organize and coordinate the local experiences of informants. Generalizability in institutional ethnography relies on discovery and demonstration of how ruling relations exist in and across many local settings, organizing the experiences informants talked about’ (Campbell & Gregor 2002, p.89).

The objective of explication underpins approaches used in institutional ethnography to present and analyse data. Strategies such as coding and categorisation of data are not used (DeVault & McCoy 2001, p.768), and approaches such as counting instances and
themes have been described as ‘unhelpful, if not downright dangerous’ (Campbell & Gregor 2002, p.85). While Marie Campbell and Frances Gregor (2002, p.85) warned that grouping segments of interview transcripts by theme can add to the problems faced by an institutional ethnographer not reduce them, Marjorie DeVault and Liza McCoy (2001, pp.768-769) argued that simple groupings around ‘topics of talk and references to institutional sites and processes’ can be used.

The first level of data analysis in my study used simple groupings of extracts from interview transcripts into broad themes that emerged from informants’ talk, broadly constructed around practices relating to practitioners’ engagement with Training Packages, the AQTF, and VET consultation processes. I undertook this process manually, rather than using computer software. As I worked with the interview tapes and transcripts I noted some common topics that emerged when informants talked about their engagement with Training Packages and other VET texts. I copied extracts from the transcripts and pasted them into a separate document, grouped around these topics of talk. I titled this document The Artefact, to remind myself of its status as something that I had produced based on interview transcripts that I had generated. As I worked with multiple transcripts at this level of detail, further topics emerged. I began to recognise that some points that I had not identified as separate topics within individual transcripts were emerging across multiple transcripts. As these topics emerged I refined the groupings used in The Artefact. This first level of analysis has supported my initial goal of directly addressing the silence around these issues, by enabling me to draw on interview data for published papers, workshops and presentations.

Having become very familiar with the content of the data through working with The Artefact, I moved on to my objective of explicating the organisation and coordination of local experiences and practices by ruling VET texts. This involved exploring actual connections between local settings and extralocal ruling texts. I set out to use the interview data to produce what institutional ethnography refers to as a ‘generous’ account of work (Campbell & Gregor 2001, pp.71-72; Smith, D.E. 1987, pp.165-167). This generous notion of work ‘means that everything that people know how to do and that their daily lives require them to do is a data resource ... whether or not people
recognise [it] as work’ (Campbell & Gregor 2001, p.72). It includes ‘what people do that requires some effort, that they mean to do, and that involves some acquired competence’ (Smith, D.E. 1987, p.165). Dorothy Smith argued that the discourses and accountability procedures used within institutions only render work partially observable. These discourses and procedures establish ‘boundaries of observability beneath which a subterranean life continues’ (Smith, D.E. 1987, p.162). Fran Gregor (1994, 2001, cited in Campbell & Gregor 2001, p.72) used the generous concept of work to bring into view a range of nursing activities that nurses themselves had thought of as ‘being helpful’ or ‘doing what they had to do to get the job done’, but not as work. My account of the work that VET practitioners do as they engage with Training Packages goes beyond the boundaries of what is recognised as work in VET accounts, and brings into view some of the work processes that VET practitioners actually follow, and the skills and knowledge that they use.

There is no single established way of presenting this generous account. One approach is to draw together data gathered from multiple sources, including interviews, and use this data to build a composite description of institutional processes in my own voice, rather than in the voices of individual informants (DeVault & McCoy 2001, p.770). An alternative approach is to use composite accounts supported by ‘exhibits, descriptions, and life stories from the transcripts’ (DeVault & McCoy 2001, p.770). For my study I have adopted the second approach, writing a composite description of some of the institutional processes surrounding the use of Training Packages and the AQTF, drawing on interview data and supplemented where indicated by other sources. I have incorporated extracts from interview transcripts to exhibit instances of VET practitioners conducting their own work, and also of VET participants describing their experience of these processes. In adopting this approach I have tried to strike a balance between preserving the voices, feelings and experiences of my informants, and respecting the thesis word limits laid down in guidelines from my university and faculty.

The interview data reflects how informants in my study talked about their professional disquiet and disjuncture. The data has a sense of immediacy and ‘presence’, and much of it is quite confronting. There is a particular quality in the way VET practitioners and
participants describe their actual experiences with Training Packages – the words they use and the stories they relate – that directly challenges and disrupts comfortable assumptions and assurances that the regulatory framework of VET supports quality education and training. The interview data sets up a tangible sense of frustration, puzzlement, of professionals feeling caught up in approaches that they know do not represent good educational practice, but over which they have no control.

The extent to which I could present the voices of my informants in the thesis itself was ultimately constrained by the status of doctoral research as a textually organised and text based process (Campbell & Gregor 2002, p.57 & p.62). University guidelines specify a limit of 100,000 words for doctoral theses (Research Services Deakin University 2004, p.28). My faculty’s advice recommends a lower limit of 80,000-85,000 words, and confirms that exceeding the university limit of 100,000 words will see the thesis returned to the candidate (Faculty of Education 2005, p.41). As The Artefact alone significantly exceeds these limits, any attempt to include a substantial selection of the informants’ words was precluded. Like many institutional ethnography studies, I produced considerably more data than I was able to use in this thesis (DeVault & McCoy 2001, p.770).

When I initially attempted to write a composite account in my own voice I unwittingly shifted the focus from my informants’ words to the activities and processes that they were describing. Losing the informants’ words made the informants themselves, and their clearly expressed disquiet, disappear from view. (Smith, D.E. 1999a, p.67) My composite account had started to read like any other VET report, where the voice heard is often that of the researcher or the funding organisation. In contrast, several presentations and publications published from my study relied heavily on direct extracts from the interview transcripts, allowing the voices of informants to come through very strongly. This approach was affirmed by the enthusiastic response each presentation and paper received from researchers and practitioners alike, and one of my papers received the Australian Vocational Education and Training Research Association 2005 Award for the Paper of the Year (Grace 2005b).
In an attempt to preserve the sense of immediacy and ‘presence’ that is in the interview data I have written my generous description of work as something of a first person narrative account, inviting the reader to stand in the position of a VET practitioner dealing with Training Packages. Wherever possible I have incorporated the words and stories of my informants, particularly where informants described their encounters with Training Packages in detail.

The description of work is presented as a full chapter. Its purpose is to provide for the reader a clear understanding of the disquiets and frustration experienced by VET practitioners as they struggle to use Training Packages to support local programs that create spaces for meaningful learning. This is followed by three chapters of analysis that seek to explicate three key elements of the social relations that are visible through the data from this study. The first two of these chapters includes some additional interview data to support particular analytical points, together with ‘level-two’ data from the examination of the VET texts that organise local sites and connect them to national policy agendas. The third chapter of analysis is largely structured around the examination of ‘level-two’ data.

**Examination of texts as ‘level-two’ data**

While interview data provides entry to local sites, explicating the ruling relations that are organising those local sites requires the use of ‘level-two’ data. Locating this data involves an approach that has been variously described as ‘archaeological’ (Kinsman 1997, p.221), ‘excavation’ (DeVault 1999, p. 30), ‘detective work’ or even ‘a bit of digging’ (Campbell & Gregor 2002, p.60).

Level-two data in my study is provided through the examination of VET texts. The mobility of the VET workforce, and particularly the way individuals move between (and sometimes even work concurrently in) positions in local sites and positions of policy and regulatory authority, means that some practitioners have a level of insight into the ruling relations. But ‘[t]here is always something missing from even very good experiential accounts made by people who live the events in questions [sic]. Some aspects of their lives are organized outside what they can know about from being there in the everyday
world of experience’ (Campbell & Gregor 2002, p.60). Essential organisational details about how local settings within VET operate only became visible when I left local sites and did some archaeological work through examination of texts.

Finding VET texts that served this purpose was a question of identifying the most relevant texts from the vast (and constantly growing) selection available. The entire VET system is text based, from the government reports and statements that underpin national VET policy, the funding agreements and legislation that establish VET governance arrangements, to the national texts that make up the regulatory framework itself: Training Packages, the Australian Quality Training Framework and the Australian Qualifications Framework. These texts are, in turn, supported by an extraordinary array of procedural guidelines, implementation instructions, ‘best practice’ models, funded research reports, newsletters, Internet sites, online databases, conference publications, and review and consultation reports. This ‘maze-like array of information’ (DET Qld 2003, p.1) is so extensive and so complex that VET practitioners struggle just to keep in touch with the most important texts that are most directly relevant to their immediate area of practice.

This volume of textual material provided a rich field for my study. In most cases the texts I used were publicly available, with the only exception being one text where I had to rely on later citations to an original text which itself was not in the public domain. In some cases I used texts that I received in my capacity as a VET practitioner. In other cases I downloaded texts that were made available on the Internet for a specific purpose and a limited period of time. Some of these texts are no longer available in the public domain except in cases where copies are retained in individual collections. With the abolition of the Australian National Training Authority in 2005 and the transfer of responsibilities to the Department of Education, Science and Training, many texts that I accessed through the ANTA Internet site have since been transferred to the DEST site (DEST n.d.b).

In most cases I turned to the selected texts as ‘crystallized social relations’ (Campbell & Gregor 2002, p.79), and used them to support the process of explication by highlighting contradictions and inconsistencies between broad public statements of policy and the
detailed administrative guidelines that direct implementation. While the thesis overall draws material from a wide range of VET texts, Chapter 8 focuses in particular on a sequence of extracts from five texts produced as part of the review and development of the Training Package qualifications for VET practitioners. The analysis presented in Chapter 8 broadly draws its approach from two papers in which Dorothy Smith explored how texts which challenged aspects of institutional order were subsumed by later institutional responses (Smith, D.E., 1990b, pp.120-158; 1999b, pp.195-223).

Keeping the research grounded

While I needed to step aside from my role as a full time VET practitioner to devote ‘sustained attention’ (Smith, D.E. 1987, p.161) to my research, the unrelenting pace of change in VET policy and practice meant that I was at risk of losing touch with what was actually happening on the ground. To avoid this I maintained part time work for all but my final year of study, and I continued actively participating in VET professional associations and practitioner networks throughout.

I also took every opportunity to make my research available to practitioners and researchers working in VET, and to seek their feedback. The publications arising from my study have included a presentation without paper presented at a national VET research conference (Grace 2004a), four refereed papers presented at humanities, education, and VET research conferences (Grace 2004c; 2004d; 2005a; 2005b), two workshops conducted at TAFE practitioner forums (Grace 2003; 2004e), and a professional development workshop conducted for a professional association of VET practitioners (Grace 2004b). I am currently developing other workshops and papers for presentation once the thesis is finished. Each of these papers, presentations and workshops was designed to be accessible to VET practitioners, to raise awareness, and to stimulate debate. Each received an enthusiastic response and generated active discussion and debate. The feedback I have received confirms for me that not only is my research relevant to the everyday experience of VET practitioners, but also that there is a great deal of interest and willingness to take up these issues.
Conclusion

Within a climate of ongoing debate about the alignment between VET research and government policy, my study is an independent research project conducted by a VET practitioner exploring a sense of disquiet that is shared by other practitioners. I used interviews and examination of texts to produce two levels of data that provide entry into local sites and allow explication of the social relations that organise those local sites. The following chapter will present a ‘generous’ account of the work undertaken by VET practitioners as they ‘unpack’ Training Packages for use in workplace learning and assessment activities. It combines a composite account based on interview data but written in my own words, and extracts from the interview data in which VET practitioners and participants talk about their own experiences with Training Packages. This generous account provides an entry into local sites where Training Packages are used, and reflects the tangible sense of frustration and disquiet experienced by education professionals constrained to adopt practices that they know do not represent good educational practice.
Where the Business Services Training Package says:

- Plans are adjusted and communicated to those who have a role in their development and implementation

Someone working in the industry might say:

Identify a current or past project where you needed to adjust your plans. Outline the events that made it necessary to change your initial plans. List the issues you needed to face in communicating, and promoting the need to go to Plan B and in implementing it with your team. Reflect on the process.

Figure 3: Training Package language and workplace vernacular: Extract from Unit BSBFLM509A ‘Promote continuous improvement’
Chapter Five: Unpacking Training Packages: A generous description of VET practice

Introduction

This chapter presents the interview data from my study in the form of a composite narrative account that describes the work a VET practitioner undertakes in unpacking Training Packages for use as the basis for workplace learning and assessment programs. Much of the composite account is drawn from the interview data but written in my own words. Some points are drawn from official VET procedures or accounts of practice, and these are indicated by citations to the source text. Where a word or phrase used within the composite account is enclosed in single inverted commas ‘ ’ this indicates that the word or phrase is drawn directly from the interview data unless another source is cited. The composite account is supported by extracts from the interview data in which informants talk about their own encounters with Training Packages. The language and style used throughout this account has been deliberately adopted to preserve the sense of immediacy and presence that emerged strongly in the interview data, and to convey the tangible sense of frustration expressed by informants to this study. The reader is invited to stand beside the informants to this study, to be ‘on their side and in their position’ (Smith, D.E. 1977, cited in Campbell 2003, p.9), and to share their professional disquiet. If the reader finds this account confronting, they may be assured that the interview data on which it is based certainly is that.

The account begins

There are many possible starting points for this generous account of the work processes surrounding Training Packages and their use in workplace learning and assessment. I have chosen to start at the point in which a VET practitioner encounters a Training Package as the performance standard that applies to job roles in their workplace. I invite you, the reader, to imagine yourself in the situation of a VET practitioner employed in a company which has registered as a training organisation so that it can provide recognised VET qualifications for its own employees (an ‘enterprise RTO’). Imagine
further that you are working with an employee who is participating in learning and assessment in pursuit of a particular vocational qualification.

The participant’s motivation might be personal development or career enhancement. It may be that the company has linked salary levels to the achievement of particular qualifications, and as a result your participant has to obtain a qualification in order to qualify for a higher salary. Perhaps new qualification requirements have been imposed by government regulation, and your participant has to achieve a nominated qualification in order to keep their existing job. All these situations currently occur in the VET context.

Whatever your participant’s motivation, you have a number of options available. If gaining the qualification will require them to develop new skills you might offer a learning program that includes an assessment component. If your participant feels that they already have all the required skills they might request Recognition of Prior Learning (RPL), where you assess their existing workplace performance to determine whether it already meets the required standard. Or you might offer a combination of these two processes, using RPL to recognise the participant’s existing skills and providing ‘gap’ training to fill any deficiencies you might identify. Whichever pathway you offer, your starting point is an endorsed competency standard from the Training Package that holds the qualification your participant is seeking.

Training Packages are texts that provide the framework underpinning learning and assessment programs aligned to national VET qualifications. Before you can take any action to train or assess your participant you will need to refer to the three endorsed components of your Training Package. The qualifications framework will tell you which units of competency your participant must achieve before you can award the qualification. The competency standards will tell you what you must look for in assessing your participant’s workplace performance, and the assessment guidelines will outline procedural requirements that you must follow in conducting the assessment. Over and above the requirements outlined in the Training Package, you will also need to be familiar with the Australian Quality Training Framework, which defines additional requirements for how you develop, document and review your learning and assessment
strategies. All these requirements are enforceable by regulation and you must keep
detailed records of all your learning and assessment activities because your enterprise
RTO will be audited to ensure that the regulatory requirements are being met.

**Texts that require a different kind of reading**

A Training Package is not a text that you can just pick up and read, you will need to
‘unpack’ it (DET Qld 2003, p.14). Unpacking a Training Package involves reading,
interpreting and applying it to your own workplace, and it can be a complex process. If
you are not a knowledgeable reader of these texts it is difficult to convey a real sense of
the structural and linguistic complexity you will encounter. To unpack each unit of
competency in the qualification you are looking at you will need to interpret a number of
different components. Each unit has a specific unit title which describes the job function,
a unit code which to a knowledgeable reader conveys information such as the industry
sector and version number, and a unit descriptor which provides additional descriptive
information. The skills required to perform the work activity are set out in elements,
which are broken down into more detailed performance criteria to define the level of
skill required. A range statement or range of variables outlines the range of contexts and
conditions in which the work activity may be performed. The evidence guide outlines
the underpinning knowledge requirements and also provides essential advice on the
evidence that you must gather to determine whether your participant is competent
(ANTA 2004b, pt 2, p.8; DET Qld 2003, p.14).

The work that you might expect to undertake in unpacking units of competency is
illustrated by one informant’s account of unpacking a single performance criterion from
the (now superseded) unit BSZ405A ‘Plan and promote a training program’.

> ‘I had a look at one criterion and just sort of pulled it apart [reading aloud from unit of
competency]. “Resources required for the program are identified and approved by appropriate
personnel and allocated to meet the training participants’ characteristics”. Now, when this is
pulled apart and turned into an assessment criteria you basically have three separate assessment
things that they have to look at in that one performance criterion. One, were the necessary
program resources correctly identified? Two, was the approval for program resources sought from
the proper person? And three, were the training participants’ characteristics considered when
those resources were distributed? So there’s actually three things in that one performance
criterion, and what I had a look at was that there’s actually no standard there. There is an implied
standard, that program resources were correctly identified, but how many resources were
identified? And then was approval for the program resources sought from proper persons or appropriate persons? And of course, “appropriate” in this particular case is not so much a standard as it is the right person, they’re looking for a right or wrong person. So how do you know who the right or wrong person is? Normally what I do, is I make an assumption that the person is somebody who’s going to be in management, but that need not necessarily be so. So it’s so broad, it’s so ambiguous. And I know to a certain extent that it has to be broad because they’re trying to cover not just one industry, they’re trying to cover a number of different industries. You might come under the HR department, you might come under some other department, you might be a manager who’s just doing your own training. So to a certain extent it does have to be broad, but the thing is it doesn’t explain what a proper person is, it doesn’t tell you how many resources they should be able to correctly identify or what sort of resources. And the final one is training participants’ characteristics were considered when the resources were distributed, so this is linking now back to the resources, and also taking into consideration the characteristics of the students. Again there is an implied thing what characteristics are you looking for? And how many must they identify? I deliberately sat down yesterday and went through this and had a look at it. There is an implied quantity, how many do they have to identify? And how many characteristics do they have to find? ... and again what characteristics are you looking at? When I look at that I think we’re looking at learning styles, but we’re not necessarily looking at learning styles. We could be looking at, do they have literacy and numeracy problems? Is English a second language with them? Are they practically orientated, which is moving into the learning styles area? They’re not defining what they mean by characteristics, and characteristics can cover a huge area. So you see what I mean when I say that it’s really quite ambiguous, and I as a teacher make the assumption that this is what it means. And if the student goes too far outside that assumption that I’ve drawn, then I’m saying “Well, no that’s not really correct because that’s not the way I’m interpreting it”’. (Libby)

In this account it is clear that, while performance criteria purport to define the level of skill required to demonstrate competence, in some cases the criteria raise more questions than they answer. Determining how to answer these questions for your particular workplace will require you to draw on your own professional expertise and workplace knowledge, consult with other employees in the workplace, and work through additional pages of detail provided in the range statement and evidence guide (DET Qld 2003, pp.14-15). If you were developing a learning and assessment plan for the unit ‘Plan and promote a training program’ referred to by Libby you would have to work through this process for a total of seventeen performance criteria grouped into four elements (ANTA 1998, pp.59-71). You would also have to refer to the Training Package assessment guide.

Over and above the requirements specified in the Training Package the AQTF requires you to consult industry about the assessment strategies you are developing, and to validate your assessment strategies, processes, tools and evidence by comparison with the strategies, processes, tools and evidence used by a range of other assessors both within and external to your organisation (ANTA 2005f, p.11). Once developed, you
must document your learning and assessment strategies to comply with AQTF standards (ANTA 2005f, p.11). To meet these additional documentation requirements you will have to identify the target group for your program, outline the strategies you have developed to meet their particular needs, and identify your delivery and assessment methods and pathways. As part of this you will have to develop and document your processes for identifying learning needs and your process for RPL. This involves developing all the policy and procedural statements and supporting documentation such as participant information, assessment checklists, and other forms. You must also outline the strategies you have in place to ensure that your program will address all relevant language literacy and numeracy requirements. You are required to prepare all this documentation and submit it for audit before your RTO is authorised to commence any learning programs or conduct any assessments.

While the AQTF consistently attributes responsibility for these tasks to the RTO, the work itself is carried out by VET practitioners. You may be one of the many VET practitioners who have difficulty unpacking Training Packages effectively. One of the informants in this study commented:

‘... it’s almost like you need to do a course in how to deal with them. It’s not a course in training, it’s a course in interpreting Training Packages’. (Jessica)

Indeed, such courses exist. In both 2004 and 2005 the state authority for vocational training in Western Australia has offered professional development for VET practitioners which included workshops on how to unpack and work with Training Packages (DET WA 2004, 2005c). Alternatively, you might refer to printed resources produced with national funding (DET Qld 2003), or at state government level (DET WA 2005b; WADoT 2002a, 2002b). You might rely instead on the clues that are now being built into the text of units of competency themselves, with some Training Packages italicising individual words in performance criteria to alert you that there is additional information provided in a later section of the unit. If you talk to other VET practitioners, you might find yourself advised to read each unit of competency starting at the back and working towards the front. In the following extract Vanessa, a knowledgeable reader of Training Packages, argues the benefits of this approach. She describes a situation where
Unpacking Training Packages: A generous description of VET practice

an AQTF auditor’s starting point for examining one of her assessment plans was to turn to the back of a unit of competency, select a point from the evidence guide, and require her to demonstrate that her documented assessment strategy satisfied that point.

‘… for a long time now people have said to me, and I agree with them, that to read a unit of competency you start from the back and read forwards. Why aren’t they displayed like that? … I had an auditor come in here, first thing he did was open it up to the evidence guide and say “I want to see your assessments meet that sentence there”. Now fortunately, I knew that, so I was able to go bingo! There it is, this is how I make sure that it meets it. But that was the first thing they looked at. If that’s the first thing they look at as an auditor, why isn’t it the first thing we look at as a training provider? Because it’s not. It’s not, they look at the title, the elements, the performance criteria, and we go gung ho to writing up assessment and learning resources that meet up with that, “Yeah, I better go to the back and make sure I meet that as well”. That’s if they think about it. A lot of the Training Packages are now being written with a couple of words will be in italics, and when you look in the range of variables that is the thing that got the additional information. So I don’t read the elements or performance criteria without having the range statement next to me so I can know exactly what it means. … I see it as a really good guide because it allows me to go “Okay, I know what track we’re on now”. And I can contextualise those italics words into our environment, into our industry’. (Vanessa)

This account clearly illustrates that VET practitioners are expected to engage with these texts at quite a fine level of detail. Indeed, to demonstrate to an AQTF auditor that your learning and assessment plans meet the requirements of the Training Package you will almost certainly have to ‘map’ your assessment tasks to the unit of competency. This mapping is typically documented in the form of a matrix which on one axis lists all the specific requirements set out in the performance criteria, range of variables and evidence guide, and on the other axis lists the various components of the assessment tasks you have developed for your program. You then fill in the matrix to visually indicate how each requirement from the unit of competency is addressed in your various assessment tasks. You may also be asked to similarly map the content of your learning program using a matrix which links each requirement of the unit to your delivery timetable or to specific page numbers in your learning materials. There is increasing acceptance that conducting and documenting this mapping is an important part of unpacking a Training Package, and it is common for AQTF auditors to require RTOs to present these documents as evidence that the process has been completed.

The complex structure of Training Packages and units of competency is not the only possible barrier you will encounter as you seek to engage with these texts at the level required to perform this kind of task. Within this structure you will find a complex and
unfamiliar language form that is not generally understood outside the VET context. The characteristics of this language form will be outlined in the next section.

**Characteristics of Training Package language**

‘And I think as far as the language goes it is a language – it is separate to English. It is separate to English. It is a special language that you have to be knowledgeable about’. (Jacqui)

Many practitioners are highly critical of the language used in Training Packages, with informants to this study making comments such as ‘it’s extremely difficult to understand’, ‘[i]t’s appalling’, and ‘[i]t would help if they were written in English’. When asked to identify those characteristics of the language that make it difficult to understand, informants spoke at length about a number of issues. Even acknowledging that not all Training Packages are the same, you could reasonably expect to find that the language used in the Training Packages you are working is abstract and non-specific with many key terms undefined. The words themselves will be complex and unfamiliar with frequent use of jargon and obscure terms rather than more familiar words. The performance criteria will almost certainly use poor grammar and be written in passive voice. The competency standards will be open to wide interpretation and you will probably need to deal with repetition and overlap.

In the following interview extract Louise, a practitioner with considerable experience in the community services industry, demonstrates the impact of this complex and abstract language form as she works through a unit of competency which she and a colleague struggled unsuccessfully to unpack. Despite this difficulty, Louise and her colleague must address this unit in a learning and assessment program documented to the satisfaction of their RTO and potentially of an AQTF auditor. Louise talks about achieving this through ‘clustering’ the unit with two other units.

Clustering units of competency for ‘holistic’ assessment is actively encouraged in official VET guidelines and procedures (DET Qld 2003 pp.14-15; WADoT 2002a, p.38). Individual units of competency align to particular job tasks, but it would be an unusual workplace in which employees performed entirely separate tasks in discrete periods of time. In most cases an actual workplace role will see an employee applying
competencies from several different units at the same time. For example, a restaurant employee undertaking the single workplace task of preparing a soup stock would draw on units of competency relating to safety, hygiene, cooking methods, and working with colleagues (WADoT 2002a, p.38).

In some cases the relationship between the various units of competency and the task being undertaken is quite clear, and some Training Packages recognise these relationships by incorporating suggestions for combining units of competency for clustered delivery and holistic assessment. While the official justification for clustering units of competency is to represent an actual job role, VET practitioners also choose this approach when they simply do not understand units well enough to be confident of assessing them individually. They hope that by clustering these units with others that sound similar it may be possible to document a learning and assessment plan that appears to address all of them. It was on this basis that Louise decided to cluster the unit she is working with.

‘It’s absolutely incredible! Oh, there’s another one “Respond holistically to clients” or to client needs or something. For a start, what does that mean? And you should see the bloody language in that! We were sitting there absolutely baffled thinking, “Now what do we do with this?” This is a catch-all unit. Basically you can use it to teach whatever you like. The language is – I just know the other day I was sitting there with my colleague at work. So we were looking at clustering, and how we’d cluster, and we were looking at that and we were scratching our heads, it had us absolutely stumped. In the end, we thought “Well it would cluster with anything, because it could mean anything!” … What we decided was, [we had clustered two other units already] … and we’d bung in “Work holistically with clients” into that as well because we didn't know what else to do with it so we thought we’d just bung in this – you know, put all three in together and Bob’s your uncle! … it had these great big long sentences that didn’t mean anything to me. And we read them over and over and looked at each other, and between fits of giggles and what not, we sort of decided that it was just really – you know. [Interview stopped while Louise obtained a copy of the unit “Respond holistically to client issues”. Reading aloud from the unit] “Evaluate the range of issues impacting on the client and on the delivery of appropriate services”. What the hell does it mean? I mean, you could say, discuss the range of issues, or identify the range of issues, but evaluate the range of issues impacting on the client? And even if you just look at the meaning of the words “the range of issues impacting on the client” – the sky’s the limit! … So what have we got? “Use observations, assessment tools and questioning to identify possible presenting issues”. I mean [Pause] Well I guess it means you sit and observe someone and make notes about how they’re behaving as part of an assessment process. But that’s not how we work. And “assessment tools” meaning, when someone comes into an agency to get help, we have questionnaires that we go through, and impact sheets – I guess they mean that. And “questioning”. I mean, we teach students “Don’t fire questions at people”. “Seek information from a range of appropriate sources to determine the range of issues that may be affecting the client within organisations policies and procedures regarding autonomy, privacy and confidentiality”. That is a huge sentence. Like it’s three lines long, and I’ve got no idea what they mean. “Examine all client information to
determine the degree to which other issues may impact on the possible services that can be provided by the organization”2. I mean, they’ve got something in mind, but I’m not quite sure what it is! So that’s the first element. “Determine the course of action to be followed”. Well that’s fairly self-explanatory. “Evaluate the benefits of providing a brief intervention in facilitating the client to access other services”. I mean, that just means [Pause] “Evaluate the benefits of providing a brief intervention in facilitating the client to access other services”. That means decide whether you should refer the client to somewhere else. “Brief intervention in facilitating the client to access other services”. I think so’. [read it aloud another 3 times, in a tone of voice indicating increasing disbelief] (Louise)

This account clearly highlights the first level on which language impacts on the practitioners trying to work with Training Packages. As you unpack the units of competency that make up the qualification your participant is seeking, you are likely to find yourself struggling to understand their content. As a result, you may begin to doubt whether your learning and assessment programs actually meet the required standard.

This is illustrated in the following extract in which Kate describes working with a unit of competency in which two elements essentially repeat each other.

‘Now this is one of the units I’m actually teaching this semester, and it’s “Work effectively with families in caring for their child”. As you can see it’s actually got six elements to it, and element five and element six are basically repetition of each other. … [reading aloud from unit] “Parents are encouraged to familiarise themselves and their children with the service and the workers”; 6.2 for this is “Parents are encouraged to familiarise themselves and their child to the service”. Now to me, those things actually say the exact same thing. So 5.2, “Parents are encouraged to develop a clear and reasonably consistent process of farewell and pick up”, 6.3 “Parents are encouraged to develop a clear and reasonably consistent process of farewell and arrival”. So this is a concern of mine. So these two here say the exact same as these two here, and yet they’re both divided into two separate elements under two separate headings. … and this isn’t the first unit as such that this has happened with … I find it throughout the Package, this is probably the most blatantly obvious one. … Look, I think repetition is good in workshops, reinforcement is good as well. But in the Training Package that you’re having to pick up and run with, especially for people who are writing learning materials based around these elements and performance criteria, I mean there’s no difference to elements five and six to me, they should be combined together. As an RTO we have made an executive decision just to join them both. … I couldn’t tell you how long I spent looking at it thinking that maybe that extra word means something different, you know, and at the end of the day it doesn’t. And yet I’d sat there and wasted this time looking at both of them going “Maybe they put that word in there for a reason, and maybe it does mean something different”. After hours of looking at it back and forth, just thinking “Maybe I’ve misinterpreted it, maybe it doesn’t make sense because I’m missing a different word in there”. It means the same thing at the end of the day. And then the [course materials] writer spending hours deciding whether she should join elements five and six together or not. You know? It’s like – Oh God!’ (Kate)

As illustrated in the accounts from Louise and Kate, you are likely to find that the complex and unfamiliar language of Training Package units will act as a barrier to your

---

2 [sic] The unit that Louise printed from the national database used both ‘organisation’ with an ‘s’ and ‘organization’ with a ‘z’.
Unpacking Training Packages: A generous description of VET practice

ability to understand their content, which in turn can undermine your confidence in your own interpretation. Further to this, you may even find that this language becomes an insurmountable barrier preventing you and your company offering accredited qualifications to employees. Your company's decision to align in-house training to national qualifications might be reversed when it becomes apparent that supervisors and staff development personnel are simply unable to make sense of the Training Package.

This situation is reflected in an account by Julia, the training manager for an enterprise RTO. During the 1990s Julia’s company decided to move into competency based training, but after reviewing the national competency standards that were available at that time the organisation decided not to adopt those standards. The story to this point is not particularly unusual; what is significant is that, having rejected the available national standards the company decided to allocate resources to developing its own competency standards. This involved a comprehensive process with input from staff and management across the nation.

‘The company decided in 1995 that they were going to rev up their training department. Our department grew over the years, but one of the things we looked at in early 1996 was competency standards. We thought, “We should try to do this right. Before we can give training we obviously need to know what to train to”. So we looked at the competency standards that were available at that time, and there were a couple of barriers to us using them at that stage. One of them being that we felt the competency standards weren’t reflective of our industry. They were quite generic and they didn’t reflect what we were doing. And secondly, they were written in such convoluted terms that we couldn’t really understand what they were getting at. So it was like “So how do we apply that terminology to our organisation?” We couldn’t see a clear fit, and they were just so unwieldy that we actually chucked them out and thought “Nuh, we’re not going that way”. We actually developed our own set of competency standards. … Well we’ve always had the philosophy that no-one understands our business like us. And how can this ANTA – and I don’t know whether it was ANTA at that stage – create these competency standards that aren’t reflective of industry. So in that regards we had no qualms at all. Because, let’s face it, at that stage we weren’t interested in accredited training anyway. We were training to maintain a competitive advantage and to maintain the skills of our people to make us a better organisation to work for. So we weren’t training to a qualification, so we weren’t tied to having to use the national competency standards. … We actually developed our own set of competency standards. They’re very very comprehensive. We developed our own set of competency standards that we use internally. This was developed by having focus groups across Australia, management involvement, selected staff involved. “How do you do your job? What’s involved?” They told us. We went back to them “What do you think of this? Is this correct? Is this how you do this and this?” They said, “Yes” or “No, this needs to be added”, or whatever. Until we came up with a comprehensive list of our unique competencies. That process took around about 8 months to complete. … And then we obviously developed our own training around our competency standards, which was very successful’. (Julia)
To this point Julia’s organisation was offering staff development programs that were aligned to local competency standards and not to national qualifications. The company’s commitment to training was acknowledged when they were invited to be involved in the development of new Training Package competency standards for their industry. Julia relates how participating in this process helped staff development personnel understand the Training Package standards. But the company still did not adopt the new Training Package competency standards because, despite being actively involved in their development, the final text was still written in a way that the company could not use it directly with their own employees.

‘So the advantage for us in being involved in the development of the [Training Package] competencies was that we were able to understand the language and use that language to refine our own internal competencies. It’s only because we’ve been involved in the [Training Package] competency standards that we’ve been comfortable with them. If it hadn’t have been for that, we probably still wouldn’t be anywhere near using competency standards. So that I guess was one of the biggest challenges for us. … Because bear in mind that we talk about the processes … But what happens then is that that’s taken away and is converted into competencies. So while we all say “Well, when you’re handling a [particular task] the first thing that you have to do is check that the information is fine, then you’ve got to send it out to the customer, then you’ve got to chase up any overdue amounts … then when it comes back you’ve got to make any changes. Simple!” But when it gets worded into competencies, it’s worded into such a way that … it suddenly becomes a big long sentence. So we’ve said “This is the process”. And then the designers of the competency standards take it away and convert it to their lingo, to the competency standard lingo. And so then they send it back to us, and then what we’ve done in [this organisation] is obviously pulled it apart again and converted it back to ours anyway’. (Julia)

In view of the regulatory status of Training Packages, it is clear that you will have no choice but to engage with the language of these texts whenever you are working in programs that are aligned to accredited qualifications. But is it necessary for your participants to also deal with this language? This depends on local decisions made by your RTO management, and there is a range of different practices that you might be required to adopt. The next section will open with an account of some of these different practices, before moving to look at the implications for participants.

**How do VET participants encounter Training Package language?**

If you are going to expose participants to the language of Training Package competency standards, it will generally be through incorporating units of competency either as part of the course information you provide at the commencement of a program, or as part of
the documentation that you give to participants when they come to be assessed. It has long been an accepted principle of good practice in workplace training that the learning outcomes and course content are explained to participants at the outset of a program. Similarly, advising participants in advance of the standards that they are going to be assessed against is not only regarded as basic fairness, it is one of the benefits often attributed to competency based training.

These longstanding principles of good practice have been reflected in the performance requirements of all three iterations of the national competency standards for VET practitioners (ACTRAC Products Ltd 1996; ANTA 1998, 2004c). It has not always been the case that participant information would be provided in the form of uncontextualised units of competency copied directly from a Training Package. Official advice from VET authorities has repeatedly acknowledged that national competency standards need to be contextualised before being used as workplace learning outcomes (ACTRAC Products Ltd 1996, mod. ABD003, topic 3.4, p.5; DETYA 2001, pp.20-21), although at least one set of guidelines advises against the use of enterprise or client specific terminology (DET WA 2005b, p.10). Until recent years you would probably have recast the national competency standards into workplace vernacular for use by your participants. Somehow this practice has changed and it is becoming increasingly likely that you will confront your participants with uncontextualised units of competency as one of the first documents they receive when they commence a program. Whether or not you will adopt this practice will depend on procedures put in place by your RTO management. The interview data suggests that these procedures have their origins in particular readings of VET regulatory texts.

**The argument presented for giving units of competency**

It may be that the management of your enterprise RTO has developed local procedures based on a belief that the AQTF formally requires that participants be given units of competency. Under AQTF standard 6 you are required to provide each participant with information about a range of matters including course content and vocational outcomes, complaints procedures, support and guidance services, fees and refund policies, and
access and equity policies (ANTA 2005f, p.8)\(^3\). Standard 8 requires that you inform assessment candidates about the assessment context, purpose and process, and that you give RPL applicants information to enable them to gather reliable evidence (ANTA 2005f, p.10).

Your RTO may be one of those which has adopted formal procedures, supported by standard document templates, where all the information requirements specified in the AQTF are addressed in a substantial document that you develop for each of your learning and assessment programs. If this is the case, the standard template may require you to show *in detail* how the training and assessment activities that participants are being asked to complete are mapped to the unit of competency. The following comments are typical of those made by a number of informants in this study who talked about being required to provide this kind of information to participants.

‘I actually do a unit outline, and the first part of the unit outline is literally the competencies that are involved. And it’s broken down into the elements and then it’s broken down into the performance criteria for each of those, so the students can see what it is that they have to do. Then what I do is I go through and set up the assessment, and next to each assessment I put the competency number and the element that it’s addressing, so the students can see how that assessment addresses a number of different elements over the two competencies that they’re covering in that one particular unit. … The first lesson I take them through it, and usually even the younger students are stunned. You can literally sort of see it. It’s almost … it’s just overwhelming. … Mind you, it takes a lot of time to do that. To prepare the written document, to match them, and to try and match them well. And then to go through it and explain it. It’s usually the whole first lesson taken up doing that’. (Libby)

‘… now I’m giving students up front programs of work, rights of appeal, assessments – it’s nearly an inch thick per student. And they look at it and it means *nothing* to them. *Nothing* to them’. (Fiona)

As a practitioner, you will possibly be highly critical of this practice, in which you have no choice but to confront your participants with large and extremely complex institutional texts. Like informants in this study, you may describe this practice as ‘confusing’, ‘overwhelming’ and ‘intimidating’. You might challenge the presumption

\(^3\) Conversations with VET colleagues suggest that, because the AQTF specifically refers to fees and refund policies, some AQTF auditors insist that participants be given written information about these policies even in enterprise staff development programs where neither fees nor refunds apply.
that these documents represent an effective way of communicating information to participants.

‘What we tend to do is we put the information down as per the unit of competence and then we talk around it to help them understand it. But we put it down in a written form, and it goes into their file, the bottom of their bag, goes home, gets onto the desk, falls into the rubbish bin, and they don’t see it again – they don’t really see it again. … They forget about the assessment bit. And the assessment bit is where we map what we are asking them to provide as evidence to the elements, and that’s the bit they just don’t want to know about, because that’s when it starts getting into the language. … Rolling of the eyes, switching off. You know, you can tell when students switch off. They just need to know that they’re doing these projects, and that’s all they want to know. They don’t want to know that it’s mapped against the elements. And then they look at them and go “What does this mean? Why do I have to do this? How do I make it fit this?” … it looks like a lot of work because of all the elements and performance criteria, which you have to tell them – under the standards – but do they really need to know about them? You tell them “Well this is all this stuff, but forget about it”, and they’re quite happy with that. They’ll go and do their work, and so long as they feel like they’re on track’. (Marissa)

Your participants may be similarly uncomfortable about the presumption that, because they have been given a complex written text, they necessarily understand its content.

‘You’re supposed to know everything that’s written on a piece of paper. Those people within the institutions, or their particular sphere – they know what they’re talking about. It’s left today for you to have that piece of paper and you to know fully what it’s about – all the ins and outs … People who are not in that sphere don’t know what is actually meant’. (Ed)

While this approach to AQTF implementation is widespread, it is by no means universal. Depending on decisions made by your RTO management, you could find that you are working within a very different approach.

**The argument presented for not giving units of competency**

It may be that the RTO you are working for has achieved a very different reading of the AQTF. In listing the information that must be provided to participants, AQTF standard 6 uses the term ‘clear information’ (ANTA 2005f, p.8). You might argue that this establishes a formal requirement that the information you provide will be in language that is meaningful to your participants.

‘There is no requirement for them to provide a copy of the Training Package. And if they do that they should be slapped, and shot … Because it says “clear information”. And if it’s not clear to the student, what it means and what it’s used for, it’s not clear information’. (Cheryl)
Based on this interpretation of the AQTF, the procedures adopted by your RTO may allow you to provide all information to your participants in workplace vernacular. You will probably make a copy of the Training Package itself available in some form, should any participants wish to refer to it (for example, one informant had placed an electronic copy of the Training Package on their organisation Intranet). As part of your program planning you will still be required to map the Training Package requirements to your local assessment tasks, but once developed these mapping documents will placed on file for reference only by your staff development personnel and AQTF auditors. Beyond this, you may be able to structure your entire learning program, assessment tasks and participant materials around workplace activities, enabling participants to complete entire qualifications without ever encountering an uncontextualised unit of competency. Several informants in this study described this practice.

‘One of the assessments we’ve got for one of our workshops is a grazing and pasture management plan for your property. We’re gonna do that anyway. We had two young blokes did it, and they came back and said “Where’s the assessment?” We said “You’ve already done it”. They go “What do you mean?” “You know the presentation you gave to the other group 6 months after you finished the course? Which is your pasture and grazing land management plan for your property?” They go “Yeah” “That’s the assessment”. And it’s like “But we were gonna do that anyway after learning all this stuff”. That’s the point. The point is about, how better to assess a competency than to go home and do it on your own place? … The framework is there to work with, but that doesn’t mean you have to go and tell everyone about it. And that’s the way we’ve used it, is like if we want to access government funds, or we want to do this or want to do this, then we have to make sure that what we’re out there delivering meets certain criteria. Yes, we know what the criteria is, but there’s absolutely no need for the end user to know what that criteria is. … We know what the Training Package is, we know what learning outcomes the producers want, we just have to align those together and sometimes it’s a matter of coming up with innovative assessment tools that do that’. (Andy)

There is a range of reasons why you might issue uncontextualised units of competency. It may be that you simply don’t have the resources available to rewrite all the units you work with, and the extensive time commitment involved can only be supported for programs that attract large participant numbers and not for those that only attract small numbers. Perhaps you are involved in delivering government funded traineeships or ‘new apprenticeships’ which require participants to record their workplace activities using a logbook that sets out the units of competency. These and other situations are described by informants in this study. Regardless of the approach you adopt in your normal practice the interview data suggests that there are two situations in particular where it is highly likely that you will expect participants to deal with units of
Unpacking Training Packages: A generous description of VET practice

competency. This is when they are applying for RPL, or if they are training to become VET practitioners themselves. These situations will be explored in turn.

**Recognition of Prior Learning**

The participant you are working with may be an experienced employee who wants to have their existing skills assessed. The AQTF requires you to offer RPL ‘to all applicants on enrolment’ (ANTA 2005f, p.10). In order to demonstrate compliance with this requirement you must develop and document a complete RPL process with all the supporting procedures and forms even if none of your participants has ever requested RPL.

As an enterprise RTO, your organisation might offer employees a variety of options for having their existing competencies assessed. Your RPL process might see participants completing the same assessment tasks that are incorporated into your learning programs. Alternatively, you might assess participants by conducting observations of their actual workplace performance. While these approaches to RPL exist, they do not appear to be widely used.

It is very likely that your RTO will treat RPL as an independent process where participants are required to gather evidence to demonstrate competence against the units of competency in which they are seeking recognition. Participants are typically provided with documentation that they work through with limited or no assistance. The documentation will probably be little more than the relevant units of competency, together with a template and written instructions for compiling what is known as a portfolio of evidence; a set of documents organised to support a claim of competence. This approach focuses on the use of documentation as evidence to demonstrate competence. Participants seeking recognition for practical skills must find a way to translate those skills into text (such as by obtaining a written report from a supervisor). Unless they are provided with comprehensive support and guidance, the combination of an uncontextualised unit of competency, a set of written instructions, and a template for assembling a portfolio of evidence make RPL an extremely challenging task for employees seeking recognition for the skills they use on the job every day. While your
RTO procedures might represent RPL as an independent process, you will probably find that you need to provide a much higher level of support than is acknowledged in those procedures.

Heidi was one of several informants who described spending significant amounts of time advising people who were considering applying for RPL. Practitioners who were providing a higher level of support than reflected in their RTO procedures talked about providing this support in additional unpaid work hours. In the following interview extract Heidi makes the point that providing advice about RPL (‘skills recognition’ / ‘skills rec’) is so time consuming that most RTOs simply give out the documentation and leave applicants to work independently. Heidi encourages participants to contact her and talk through the RPL process, but if her employer had to pay her wages for the time she spends providing this support it would not be commercially viable.

‘I’ve sat down with prospective people who were thinking of doing skills recognition, and gone through and spent minimum of an hour going through some of the terminology. … So you can understand why a lot of people just send out the skills rec kit, and most of the time that’s what happens … I encourage them to ring and talk and discuss it over the phone, but commercially that’s not viable for people’. (Heidi)

In your own practice, you will need to commit significant time and work to RPL. You might spend the time required to develop and document an innovative RPL process that does not rely on the independent portfolio of evidence approach. If you do not do this you will almost certainly find that you have to provide a high level of support and guidance to RPL applicants as they interpret units of competency and gather evidence for their portfolio.

**Inducting novice VET practitioners**

The interview data indicates that you will probably have no choice but to give participants units of competency when those participants are undertaking the Training Package qualifications for VET practitioners. Even if you are committed to the principle that participants should not be exposed to Training Packages, you are likely to argue that participants who are working towards becoming VET practitioners themselves should be required to deal with these texts and the language they contain.
This points to a significant issue evident throughout this study. Despite being heavily criticised, the language used in and around Training Packages has achieved a level of acceptance as the professional language of the VET sector. One informant argued that VET practitioners should not apologise for this language but should embrace it as the language of their profession.

‘I believe that … when people are, in a sense, enculturated into the Training Package or competency based approach to training, that they actually start to use that professional language. … I would propose the difficulty around the VET system is that unlike universities it actually has these major intersections with communities and industry, and it’s in that area that a lot of the criticism arises. Because industry has a language, and different industries have different languages, and the community has a whole set of languages and understandings as well. And therefore, VET always feels … that it needs to be the one that has the language that needs to be translated. … So I understand that it is difficult. But I’m saying too, very strongly, that if people want to develop as a professional in the VET sector, that they need not to apologise for this but to actually embrace it and say this is our language’. (Anita)

You may be sceptical about or critical of this excluding language form, but once you become a knowledgable user of the language and competent reader of VET texts you will probably make conscious choices to use it yourself when you feel it is to your own advantage.

‘… sometimes it works to your advantage, that if someone comes up to me and says “Well why did you do this, this and this, and what about that?” And I go “Well I saw it as this, this, this and this”. So I can use the language to back up my argument, and they go “Oh, OK. I can see what you mean by that”. But isn’t it interesting that you can do that? So what’s that saying about the language?’ (Fiona)

If you write any official reports, and you want them to have credibility, you will need to use VET language regardless of the consequences for readability and accessibility.

‘I think unless you’re a VET specialist, and you understand the terminology, you’re out of the game and you haven’t got a chance. Writing [a research] report, when many times I’ve had to think about what the VET language is, and that’s one of the problems that I knew I was going to have. The report would lack credibility unless I used VET speak. So being the devious lad that I am, I hired somebody to do the VET language for me. I mean, it cost me a thousand bucks in my budget, but – you know – that was the way to go. So the result now is that it’s written in VET speak. The terrible thing is that this report is for [people whose background is schooling not VET], and they may not understand VET speak’. (Tony)

Resistance to the imposition of this language form as the professional language of the sector is reflected in a growing tendency for VET practitioners to name the language. Informants in this study variously referred to the language as: ‘VET sector public service
Despite this resistance the language form typically used in Training Packages and other official VET texts is increasingly becoming established as the professional language of VET. This creates a significant dilemma for practitioners whose participants are working towards achieving the qualifications for VET practitioners. The AQTF requires that RTO staff who are involved in learning and assessment hold nominated units of competency from the Training Package qualifications for VET practitioners or to ‘demonstrate equivalent competencies’ (ANTA 2005f, p.9). As an enterprise RTO, any staff members in your organisation who provide training or conduct assessments will be expected or encouraged to obtain the nominated units. Regardless of your own views about the language of Training Packages in general, you will be confronted with a dilemma. The language used in the qualifications for VET practitioners was described by informants in this study as particularly difficult, and to use this language as you work with your own staff will almost certainly make it significantly more difficult for them to achieve their qualification. Even if some members of staff are experienced VET practitioners you will still find that they struggle to make sense of the language of this Training Package.

Using this language in your learning and assessment programs makes the qualification less accessible. But if, in your effort to make the qualification more accessible, you recast your materials from the Training Package language into workplace vernacular then you risk creating a different kind of barrier. Your staff members may become qualified VET practitioners, but they will have no access to the institutional language that will enable them to work effectively with Training Packages, participate in decisions at RTO level, understand and comply with the AQTF, or engage in the debates of the profession. This dilemma consistently emerged throughout the study, being raised both by practitioners working with novice VET staff, and by the participants who had achieved this qualification. It has also been a significant dilemma that I have struggled with in my own practice. This is a situation where, whatever approach you adopt, there is no right answer.
When you expose workplace supervisors and staff development personnel to the language of this Training Package you can expect to encounter some active resistance. This is evident in the following account by Marion of her experiences delivering the Certificate IV in Assessment and Workplace Training. Despite the objections and ‘grizzling’ of her participants, Marion feels she has no choice but to insist that they learn to work with the language of the Training Package.

‘… the amount of grizzling from people who are doing training and assessment on-site who are very effective, and conscientious and do all the right things say “I can’t understand what this thing’s bloody talking about. Why do I need to know this terminology?” And we have to say “Well, because it’s the language of training”. “Not in my training room it’s not!” We go “OK, but if you need to talk to other trainers and assessors you have to have at least an understanding of what they’re saying, even if you’re not using the terminology yourself”. “Why?” “OK. Why do you have to know that? Because you just do, so we can all talk about the same thing at the same time, and we can understand each other”’. (Marion)

The staff members you are working with might make a distinction between the language used in the Training Package, and the language they use in their own learning and assessment practice. Amy, a participant who had completed the Certificate IV in Assessment and Workplace Training, made such a distinction.

‘But this particular language was just something foreign! … it’s not the language that I would use with a manager that was talking to me about assessment principles, to the people that want me to deliver a training program, to the participants in a training program. I would never ever use this language again in my working. … I think that the people who deliver this training course, it’s their industry language. It’s not a language that trainers in the workplace would use. … Trainers who are training trainers are in a different industry to people like me training people who are looking for a job, so your language will be different’. (Amy)

On the other hand, if your participants recognise this language as a signifier of their membership of the profession, as they master it they may embrace it with some enthusiasm.

‘It’s just that I don’t want to sound negative because up to now I kept saying that yes, the language was difficult, and yes, the terminology was difficult and people had problems and initially I had problems. And it was just initially for everyone, is initially, the problem is initial. And then after a while when people get to know and used to the new terms and are familiar with the new terms and can see the benefits of competency based training … and I have seen it on their faces, some of the participants faces – they were so proud of their achievement at the end. That in a way it’s sort of as if they were saying “Well, I’m one of you now. I know the secret language, and I can communicate with you”. And I could see in their tone of voice, in their body language, the way they talk, and very often they would use again and again the new terms as if they were something to – you know – to talk about’. (Angela)
You may criticise the language of Training Packages, and in many instances you may recast the language of other Training Packages you work with. But the interview data strongly indicates that when you are working with novice VET practitioners you will have no choice but to require them to deal with this language.

What impact does the language of Training Packages have on participants who encounter it?

**The impact of language on participants**

What happens when employees in your workplace encounter a performance standard that relates to their job role but is written in language they do not understand? In all but a very few industries, you will find that the language used in the Training Package for your industry is *not* the language that is used in the industry itself. The interview data clearly reveals that many competent employees in your workplace will be unable to read and understand the units of competency that define the performance standards for their job role.

If your RTO procedures allow, you may choose to contextualise the units of competency and write all your participant materials in workplace vernacular. Drawing phrases from the interview data, it is clear that if you write your materials in familiar language you will find that ‘people prefer the products that [you] write and develop’. Participating in your learning programs may send your participants’ confidence ‘sky high’, and give them ‘confidence in *themselves*’.

On the other hand, if your RTO procedures require you to hand out uncontextualised units of competency, you will find that your participants ‘freak out’, ‘lose interest’, they will openly challenge the content of your programs asking ‘Why are you covering this? … it doesn’t tell me how to do my job any better’ They may swear, with reactions such as ‘*Holy Shit!* What does *this* mean?’, or ‘Well, *that’s* a crock of shit’. They might ‘grizzle’, or ‘whinge and complain throughout the whole course about the language’. Participants will ask ‘Well, what does this *mean*?’ or they may be less polite and ask ‘What’s this crap? Tell me, in *real words*, what this means’. You will certainly need to
‘interpret for them, and put it down into basic terms’. You might spend up to half a day in a three-day course explaining the information that you have given at the outset, or you might have to stay back after the course has finished, explaining the units of competency. When you hand out uncontextualised units and then explain them using workplace vernacular, as your participants realise that they are already performing to the standard they will ask you ‘Well if that’s what they mean, why don’t they just write it?’ Other participants may react with ‘Get out of here! You’re kidding! You’re absolutely joking!’

In many cases you will find that giving participants the units of competency ‘creates a sense of fear’, and it might be ‘a huge blow to their confidence’. Participants may find this ‘scary’, ‘frightening’ or ‘intimidating’, they may feel that the language means that ‘the assessment itself will be harder for them, difficult for them to actually pass, to achieve, to be competent’. The may be ‘nervous and twitchy’, find their confidence undermined, or ‘think that they’re stupid because they can’t understand it’. You may even find you have cases where participants ‘ended up in tears. Crying, because they thought they weren’t going to be able to do the course’.

Participants may avoid engaging with the materials. You might find that some have ‘dumped all the stuff they got with all their Training Package material down the back of the sofa’, some might start ‘taking sickies because they know [you are] coming’\(^4\). Some may even ‘give up because it’s too much’, withdraw from the program and ‘say goodbye. I mean, why bother? What’s the point?’ In some cases ‘People will only do it if they really really really have to, or if they really really really want the qualification’.

If employees in your workplace are formally required to achieve certain qualifications as a requirement of their job role some will feel they are in ‘a forced situation’ where they have no choice but to persevere with the language. Even when salary levels are linked to qualification requirements you may still find that some employees end up ‘sitting at this pay point below where their real life competency shows that they’re at, because of what

\(^{4}\) Reporting sick and being absent from work.
they see as these barriers created by some of the competencies and assessment processes’.

The impact of the language is clearly evident in extracts from interviews with two VET participants. Christine undertook a Diploma qualification from the Training Package for Assessment and Workplace Training. Despite being a confident learner who already had considerable VET experience she found that the language of this Training Package undermined her confidence as she worked through the course.

‘...and it made me feel really dumb. *Really* dumb. Because I wasn’t expecting not to understand what was given to me. I think that was the biggest thing. Because I’ve not had any problems through schooling and all the rest of it. And to be thrown into this situation where – I think I was probably more highly educated than more than a quarter of the people who were there, and I was having trouble. And they had no idea either. ... It did have an effect on the training, because I didn’t know whether I was going to finish the Diploma, because it was just *too hard*. There was just *too* many barriers there for that. And I felt really stupid, because I couldn’t finish this *vocational* qualification, and that was just beyond me. I thought “What? I can’t get it”. And I never really thought that there was something wrong with someone else. It was me. I was the problem. It’s quite instilled in the whole system’. (Christine)

Jan was an experienced supervisor and workplace trainer who explored the possibility of undertaking a qualification in frontline management (‘FLM’) anticipating it would be by some combination of RPL (‘skills rec’) and training. One unit related to developing work priorities, and despite having experience in this role Jan decided not to proceed.

‘I thought “Oh well, I’ll have a look at FLM”. I didn’t necessarily know whether I could skills rec, but even just to do it as a course, and kind of look at it. I’m not in a management capacity at the moment, but I have been previously, where I’ve looked after teams and supervised and all that, and thought “Oh, this wouldn’t be too bad”. But you start to read it and just go “There’s just no way I can do this”. Until you kind of sit and interpret it and go “OK, well it’s not as full-on as I first thought”, but the language kind of makes it seem a whole lot more academic than it necessarily is. ... I have no problems with *comprehension*, reading and understanding something – but the way they’re written I feel like I have to read them, interpret them and *then* comprehend them. It doesn’t *flow* naturally where I read and instantly comprehend. I have to read and almost put them in plain English language terms and go “Oh, OK, I understand that now”. ... I guess I’m intimidated by the whole going back to school or going back to formal study *anyway*. And then when you start to read the criteria and that, you sort of kind of go *ugh*. I don’t know that I can … the wall goes up and go “Oh that’s too hard, I can’t do that”. ... It would be *nice*. Like, developing work priorities is something that I’ve been doing for a *long* time, for both myself and teams of people … From that point of view I could probably gather the information. But the extra step that’s *involved* in that is that I have to *read* through these, *interpret* what they mean, and *then* go looking for evidence’. (Jan)
As a VET practitioner using Training Packages as the basis for local workplace learning and assessment programs, what strategies can you use to help overcome the barriers created by this language?

**VET practitioners as Training Package interpreters**

The interview data reveals that you will spend considerable amounts of time and energy translating units of competency from the institutional language in which they are written into a vernacular that is meaningful to your participants. Your RTO procedures will determine whether you do this by developing local learning and assessment materials in which program requirements are expressed in workplace vernacular from the outset, or whether you give participants uncontextualised units of competency and then spend time explaining what they mean. Either way, the role of translator or interpreter will be a key role in your work as a VET practitioner. The local interpretation of Training Packages is occurring on a number of levels.

Some informants described providing a consultancy service that included interpreting Training Packages at organisational level, even for organisations whose staff development personnel were highly qualified.

‘What tends to happen is that they don’t understand what it’s all about. So I come in and provide them with a framework. … I might come in after there’s already been an effort in a workplace to implement the competency standards via a Training Package … And I come in and they say “We don’t understand it. We don’t want to know anything about it. We just want to be able to assess people in the workplace so they’re competent”. … What I’ve found is that they don’t understand what the Training Package means. So the first thing I now do when I go in there is I interpret, I have a table I use where I’ve got the element of competency, the performance criteria, and then I’ve got another one that says “What does this look like in this workplace?” I’ve called that “learning objectives”. So that they have it in their language, … I come in as the learning professional or the curriculum expert or whatever you want to call it, but I work with the subject matter expert in that workplace. And I reframe that language. … It keeps me busy! We’re talking government here – people with double degrees’. (Sara)

Several informants talked about developing local learning and assessment materials that were contextualised and written in workplace vernacular, reserving the Training Package itself for the use of staff development personnel.

‘All our people have access to this [locally developed] document. Only the training department bother with this one [the Training Package], because – why? It’s not contextualised for them. Our frontline people don’t need it, it’s not part of their role. If you like, the training department, we’re
the filter between the AQTF requirements and delivering it to the customer, being our employees. So we’re the filter, we have to decipher it and filter it out and contextualise it so it makes sense to our business. And that’s all that our clients, our staff, have to do with it. So that’s our role as a training department’. (Julia)

Other informants described struggling to cope as they work within RTO procedures that constrain them to issue learning and assessment materials that alienate and intimidate their participants.

‘We had one example in a nursing home. Ladies who historically have maybe left school early, brought up their families, maybe returned later to the workforce. Have had no access to formalised education, don’t have a qualification after their name. This nursing home decided to do an RPL process for some of the core units in Certificate III in Aged Care. … I set up awareness sessions. I met them one on one. I had at least three sets of awareness sessions where I went out and didn’t even bring the competency standards into it. I put “These are the things that we’re going to be looking at” and we put their job duties of what they did and how they did it. So we turned it around to look at what they were going look at first, to make it accessible so that they could relate to it. But as soon as you brought out the standards – because they have to have them – it was huge. I kept going back three or four times, and it took us a year to actually get them trust us and to come to us, to build that rapport with them to say “Yes, we can support you through this, we can do this”’. (Fiona)

Fiona’s comments reveal that, if your RTO requires you to hand out units of competency and then explain them, you will have to do much more than simply interpret the language. Encountering uncontextualised units of competency has such a negative impact on participants’ confidence that you will need to develop strategies for encouraging participants, trying to rebuild their confidence, and trying to ‘coach them back in’ if they decide to withdraw from their program.

All this work is hidden. It is not acknowledged in official VET accounts of unpacking Training Packages, nor is it typically recognised in RTO procedures, staffing levels or budget allocations.

A tangible sense of puzzlement

All this gives rise to a tangible sense of puzzlement. As a VET practitioner you will not only be aware of the impact that the language has on your own ability to work with Training Packages, you will be continually confronted with the impact it has on your participants. The puzzlement that arises was strongly evident throughout much of the interview data from this study. Some informants expressed puzzlement in the form of their own frustration with the language.
'Initially when I started with the Package it was difficult for me to grasp the concepts, and the question that I kept asking myself was why? Why on earth someone would actually introduce new terms when we had already some of it, and we had been using quite successfully?' (Angela)

Several practitioner informants expressed their puzzlement and frustration by relating the sorts of questions they have to deal with from their participants.

‘Often it’s just a matter of one or two words, and interpreting that word for them. Look, it’s amazing, I do it all the time. They bring in their stage three logbook and they say “What does this mean?” And I say “Look, what it means is this” and they say “Well why doesn’t it say that?” You know, and it’s like – “I don’t know”’. (Kate)

If the employees of your enterprise RTO include people from groups whose needs are typically not well met by the formal education system, the barrier created by this language takes on additional significance. Tony has considerable experience working in partnership with Indigenous communities. In the following extract he draws attention to the particular issues that arise when the discrepancy between institutional VET language and local vernacular is just one part of a much wider cultural gap.

‘And if at the start of a course, where you’re explaining what the course is and looking at learning outcomes, and they’re all in VET speak, it’s just a non-event. It’s an absolute bloody non-event. Because this stuff firstly is written language, and you’ve got people with low levels of literacy. And it’s written in polysyllabic terminology, which a lot of them can’t even begin to work their way through. And it’s not written in their language, which is an arrogance of an enormous level. The assumption is that these people have to come across to our culture, rather than us going across to their culture or finding a path through the middle. And unless you actually acknowledge that there is another culture, and use their language, rather than VET speak, then you haven’t got a snowflake’s chance. You really haven’t got a snowflake’s chance of getting meaningful learning occurring’. (Tony)

Several practitioner informants raised equity issues when they described the experience of women returning to education and employment after a long absence, adults who left school at an early age, and people whose first language was a language other than English. These informants identified the barrier created by institutional language as being almost insurmountable.

As you unpack the Training Packages you are working with, and use them to support local learning and assessment activities, you may well share the frustration expressed by practitioner informants in this study. In many cases this frustration came down to the discrepancy between good learning and assessment practice as practitioners understand it, and the practices adopted in response to national VET texts.
'It’s very important when we’re training to always be talking to a person and not down to them, or up to them for that matter. And the way it’s all put in the Training Package – I mean it’s fine for us trainers to understand, and of course we should, but you’ve really got to put it into the language of the people that you’re dealing with. … at the end of the day that’s what you’re there to see, whether they can perform that task competently. Not whether they can read seven syllables correctly or whatever else. … you want people to understand what you’re telling them, and to take that knowledge away with them. They’re not going to take it away with them if they can’t even understand what’s coming out of your mouth’. (Colin)

**Conclusion**

This chapter has presented a generous account of the work that a VET practitioner does when unpacking Training Packages to use as the basis for local workplace learning and assessment programs. While this account does not claim to reflect every VET practitioner’s experience of Training Packages, it is an account that will be widely recognised. Some practitioners will see elements of their own experience in this account, while others will find that it reflects issues and concerns that colleagues have shared with them. On that basis this account provides a strong entry point from which to explore issues relating to the language of Training Packages and to explicate how national VET texts organise and reshape activities conducted in local sites.

Each of the following three chapters will explore one of the elements of the problematic for this study, beginning with an analysis of how local workplace practice is socially organised and reshaped through the use of Training Packages as the basis for judging competent workplace performance.
Where the Financial Services Training Package says:

- All sources of risk information are identified, gathered and recorded and deficiencies rectified

and

- Data is formatted for easy access

Someone working in the industry might say:

Indicate what general information we need to obtain from the customer so that a quote can be provided. Input the information into the computer system.

Figure 4: Training Package language and workplace vernacular: Extract from Unit FNBGEN04A ‘Evaluate risk for new business’
Chapter Six: ‘That’s just not how I speak’: Organising workplace practice through national competency texts

Introduction

This chapter will address the first element of my problematic, how local workplace practice is socially organised and shaped by the use of external Training Packages as the basis for judging competent performance.

The description of work presented in the previous chapter revealed that many participants in workplace learning and assessment programs simply do not understand the Training Package competency standards that relate to their job role. Informants in this study expressed disquiet and frustration about the complex language of these national texts, and this disquiet provides an entry point from which to explore the institutional processes that shape workplace practice. While some processes can be viewed through the interview data, others only come into view through examination of the VET texts that connect local sites to national ruling relations. The following discussion will explore these processes drawing on both levels of data: interviews and examination of VET texts.

The discussion is broadly structured in two parts. The first part explores the process by which workplace performance is judged against the standards specified in national Training Packages. It argues that participants are engaged in a socially organised and text based process in which they become constructed either as ‘competent’ workers or as workers who are ‘not yet competent’. The discussion explores a number of barriers that confront participants seeking to engage with Training Package standards. It examines how authoritative interpretations of Training Package standards are achieved and proposes that this process shifts authority for local knowledge from local sites to external VET authorities.

The second part of the discussion explores the processes by which Training Packages become authorised as ruling texts. Training Packages are unproblematically asserted to be industry benchmarks that are developed by industry. The following analysis
challenges this assertion arguing instead that Training Packages are government regulatory texts which, while developed with industry input, actually arise from and are connected to government policy agendas. The chapter discusses some of the features of the institutional language used in Training Packages before drawing to a close with a brief exploration of strategies used by practitioners and participants to resist the imposition of this language form.

The analysis begins by exploring what participating in workplace learning and assessment means for individual participants.

Two views of workplace learning and assessment

The following discussion will contrast two different views of participation in learning and assessment: as presented in VET texts and as viewed through the frameworks provided by institutional ethnography.

Learning and assessment: A ‘pathway to a better job’

As represented in VET texts, participation in VET is a ‘pathway to a better job’ (ANTA 2005k). It presents an opportunity to learn new skills, or to have existing skills recognised or upgraded. Participants in workbased learning or assessment are engaged in quality assured programs that lead to nationally recognised and portable qualifications. Any training component will be planned to meet individual learning needs, it will use a variety of delivery approaches to suit a range of learning styles, and participants will be provided with guidance and support (WADoT 2002a, pp.83-84; ANTA 2004a, pp.227-353; 2005f, pp.11-12). The assessment process will be fair, flexible, reliable, and valid (WADoT 2002a, p.29; ANTA 2004a, p.401). Participants will be assessed by an appropriately qualified assessor who has relevant vocational expertise, and both the process of assessment and the standards being used as benchmarks will be explained in advance (ANTA 2005f, pp.9-10). Each participant will be fully involved in the assessment process, their evidence will be honestly appraised and the assessor’s judgement will not be influenced by prejudice or assumptions (DETYA 2001, pp.103-105). The assessor will communicate clearly throughout the assessment, the participant
will have the opportunity to negotiate changes or ‘reasonable adjustment’ to address any special needs, and they will receive feedback, guidance and support (ANTA 2004a, pp.395-396). Participants who are assessed as ‘competent’ will be issued with either a full qualification or a statement of attainment that reflects partial completion of a qualification (ANTA 2005f, p.12). Those who are assessed as ‘not yet competent’ will be provided with an action plan to guide them to more training, further assessment opportunities or individual support (ANTA 2004a, p.404; DETYA 2001, p.105). If a participant does not agree with an assessment decision they have the opportunity to appeal (WADoT 2002a, p.33).

As represented in VET texts participating in learning and assessment is generally a supportive process in which the participant is fully informed and fully involved. Some informants in this study described practices that reflect this approach and this will be explored in a later chapter. The present discussion will begin by exploring a very different way of looking at this process.

**Learning and assessment: Being constructed as a competent worker**

Seen through the frameworks provided by institutional ethnography employees engaged in workplace learning and assessment aligned to national VET qualifications are participating in a socially organised and text based process that connects local workplace activities to national government political and economic agendas. They are entering a form of the relations of ruling in which they are positioned as ‘supplicants’ (Campbell & Gregor 2002, p.62). In this process a VET practitioner will have power to determine whether or not the participant will be judged competent.

While some employees participate in workplace learning and assessment through their own choice others are given little option. Informants in this study described a range of industries in which government regulation has established formal qualification requirements. For example, forestry workers require formal certification before they are permitted to operate machinery, employees in financial services must have certain qualifications before they are authorised to give advice to clients, and supervisors in any industry must obtain formal qualifications before they are able to train or assess staff.
against Training Package units of competency. Some informants also described local business practices in which individual organisations align remuneration levels to nominated qualifications. Where government or organisational qualification requirements exist employees are confronted with the need to demonstrate their competence in order to move into a new job role, or even to retain their current position.

‘Competent’, ‘competence’, and ‘competency’ all have established meanings outside the VET sector. *The Macquarie Dictionary* (2004) defines ‘competent’ as ‘properly qualified; capable’, and defines ‘competence / competency’ as the ‘quality of being competent; adequacy; due qualification or capacity’. The VET definitions of these terms link to their common usage definitions but with some significant differences.

Competency within VET is defined as ‘the specification of knowledge and skill and the application of that knowledge and skill to the standards of performance required in the workplace’ (DETYA 2001, p.203; WADoT 2002a, p.96). This is virtually identical to the VET definition of ‘units of competency’: ‘the specification of knowledge and skill and the application of that knowledge and skill to the standard of performance expected in the workplace’ (ANTA 2005f, p.18).

There are significant differences between the VET definition of competency and the common usage definition. These differences reveal certain characteristics of the concept of competence as it is activated in VET. Rather than being a broad quality, competence in VET is strongly performance based involving both the *specification* and *application* of particular qualities: knowledge and skill. Other qualities that an individual might hold presumably have no bearing on competency within VET. Similarly, VET defines competency as relating to *workplace* performance only. Knowledge and skill that has application beyond the local workplace context, but not within it, is excluded. Further, the remarkable similarity between the VET definition of ‘competency’ and that of ‘units of competency’ reveals that in VET ‘competence’ is inseparable from the official text based benchmarks against which it is assessed. Overall these VET definitions establish a performative definition of competency with a narrow workplace focus that has been described as socially reductive (Anderson 2000, p.36).
For an individual participant being judged competent results in the award of a nationally recognised qualification and can confirm them in their existing job role or provide access to new job opportunities. Participants are unlikely to be aware of the technical definition of competency used in VET but they would be familiar with the common use meaning of ‘competent’ and of its association with related concepts such as ‘capable’, ‘expert’, ‘proficient’ and ‘skilled’. (The Macquarie Encyclopedic Thesaurus 1990). All this makes an assessment of ‘competent’ an outcome that affirms the participant’s identity as a good worker. In contrast, an assessment of ‘not yet competent’ represents a very different outcome.

In the absence of a formal definition it is presumed that a person is ‘not yet competent’ if they are unable to demonstrate that they can apply knowledge and skill to standards of performance required in the workplace. This may be because they do not have the required knowledge and skill or because they are unable to provide sufficient evidence to demonstrate their competence to the satisfaction of an assessor. Where formal qualification requirements exist a participant who is judged ‘not yet competent’ risks being denied access to promotion or even being required to move from their current job role. The tangible implications can be extremely serious for the individual, as can the impact on self-esteem and identity. Neither The Macquarie Dictionary (2004) nor The Macquarie Encyclopedic Thesaurus (1990) includes the phrase ‘not yet competent’. The thesaurus reflects common usage by listing the opposite of ‘competence’ as ‘incompetence’, a popular dichotomy that is also recognised in the literature (Beevers 1993, p.89; Jackson 1993a, p.160). It is hardly surprising that many participants perceive ‘not yet competent’ to be tantamount to a judgement of ‘incompetent’.

The issues here are more than just semantic; this language goes to the heart of what is often perceived to be at stake for employees when they become participants in workbased learning and assessment. VET texts construct the competency based assessment process in terms of the organisational outcomes that VET recognises: a participant will receive either some form of certification or guidance on addressing skill (or evidence) gaps. What is perceived to be at stake from the participant’s perspective, well beyond the question of formal qualifications, are fundamental issues of identity and
job security. This is strongly evident in the interview data and it is crucial to an understanding of the impact that engaging with Training Packages has on individual participants.

‘Oh, everyone’s always nervous about being assessed. They’re always sure they’re gonna fail one way or another. I suppose it’s just the nature of people. Fine when no-one’s looking, as soon as someone’s looking and taking notes it’s – you know. … And you’ve got to take all those factors into account when you’re assessing people. And put them at ease. … But for some people just talking to a stranger is enough to make them nervous, despite the fact that that stranger’s just about to make a judgement of whether they can, or can’t perhaps, do something – a judgement that’s fairly relevant to their workplace, their own career. … Well there’s all sorts of implications. For a start they may be taken off the machine, put somewhere they don’t want to be. They could have a lower pay as a result, less opportunities in the future. … a lot of the stuff we do they’ve gotta have the qualification to do the job’. (Colin)

How does an individual become regarded as ‘competent’ or ‘not yet competent’? VET texts clearly indicate that the only basis for judging competence is to conduct a formal assessment against nationally endorsed units of competency (DET WA 2005b, p.6; WADoT 2002a, p.17). The description of work presented in the previous chapter revealed that units of competency are typically written in language which may or may not be fully understood by the practitioner and which is complex, unfamiliar and intimidating to the participant. These texts are ‘used to constitute the ‘actual,’ to stand in for workplace reality’ (Jackson 1995, p.169). Competency in VET is seen as including knowledge and skill and sometimes also attitude (Smith, E. & Keating 2003, p.135). For an individual participant’s performance in a local workplace to be recognised by the award of a VET qualification it must be documented in terms of the relevant Training Package competency standard and verified by a nationally recognised assessor. In this process units of competency act as an abstract and generalised representation of the knowledge, skills and attitudes required by individual employees at the local workplace level.

An assessment judgement is based on the participant’s workplace performance only to the extent that their performance can be represented as ‘quality evidence’ against units of competency (ANTA 2004a, p.362). ‘What counts is not what individuals do per se, but what individuals can be shown to have done (Jackson 1993a, p.157). Even knowledge, skills and attitudes that are valued in the workplace have no status in the ruling relations of VET until a qualified assessor documents them in terms of the
applicable Training Package standards. By participating in workplace learning and assessment individuals are engaged in a socially organised and text based process in which they are constructed as either ‘competent’ or ‘not yet competent’ depending on the extent to which their skills and knowledge can be documented against ‘extralocal’ texts (Smith, D.E. 1987, p.3).

**Authorised texts that stand in for local workplace practice**

Training Packages are national texts that are taken up and activated in local workplaces. Their competency standards are abstracted from particular individuals and local contexts (Jackson 1995, p.166), treating the workplace as little more than a ‘backdrop’ for the demonstration of skills (Darrah 1997, p.252). National units of competency do not describe actual work processes in particular local sites; they specify ‘determinate packages of skills’ that are used to order social relations in a wide variety of different sites (Smith, D.E. 1990b, pp.218-219).

These abstract and decontextualised standards provide the only authorised basis for assessing workplace skills and knowledge that are local, specific, contextualised and contested (Farrell 2001, 2003). The interview data reveals that even participants who are acknowledged to perform their job to the standard required in the workplace can find that they are unable to make the connection between that work performance and the relevant units of competency. What is happening here?

One presumption that can operate here suggests that a competent worker should be able to understand the units of competency that relate to their job role. If competence itself is inseparable from the text based unit of competency it might be argued that a participant’s inability to understand the unit could be sufficient in itself to raise doubts about their competence. This presumption is reflected in the following interview extract, in which Mark describes a Recognition of Prior Learning process where participants are given uncontextualised units of competency (‘learning outcomes’) on the basis that an inability to understand the unit suggests an inability to succeed in RPL (‘skills rec’).
‘... one of the areas in our college that said “We just give the learning outcomes out”. The rationale being, because it’s in the language of the industry, if you can’t understand the learning outcomes, you probably can’t do skills rec’. (Mark)

Other informants challenged this presumption, describing participants whose everyday work activities provided all the evidence needed to demonstrate competence but who could not make sense of the applicable units of competency until those units were recast into workplace vernacular. These were not cases in which Training Packages identified inadequate workplace performance. What is happening in these instances is that the language of uncontextualised Training Package units is preventing employees being recognised for performance that does meet the standard.

A alternative explanation might argue that a participant who is unable to understand a unit of competency may be competent in the technical skills required to perform job tasks but that their language and literacy skills are deficient. The appropriate action in these cases is defined by established VET policy on language literacy and numeracy, which is instrumental and performative and focuses on functional workplace literacy (Anderson 2000). Using this approach the assessor is encouraged to identify the participant’s perceived language difficulties as ‘special needs’ and make ‘reasonable adjustment’ to the language and literacy requirements of the assessment. The reasonable adjustment must be fully documented, and the assessor may not make any changes that undermine the validity of the assessment against the relevant unit of competency (DET WA 2005b, p.20).

Within a regulatory framework in which RTOs are required to document learning and assessment strategies in some detail reasonable adjustment is constructed as providing flexibility and responsiveness, allowing documented strategies to be modified to meet the needs of individual participants (DET WA 2005b, p.20). The regulatory requirement for learning and assessment strategies to be documented against national units of competency reveals an expectation that there is a standard benchmark that will meet most cases and can be adjusted to address individual deficiencies. This is a deficit model in which individuals are at risk of being viewed as dysfunctional if their own literacies do not align to those represented in the Training Package (Anderson 2000, p.36).

Provision for reasonable adjustment to meet identified (and documented) special needs
is an educational solution that identifies individual participants as ‘deviant’ and ‘inadequate to the tasks of the educational process’ (Griffith 1992, p.427).

Several practitioners in this study rejected this approach and challenged the presumptions on which it operates. Focusing on the language of the texts rather than the language and literacy skills of individual participants, they adopted strategies to make units of competency accessible to and meaningful for all participants without singling out individuals as having ‘special needs’. These practitioners recognised that participating in VET programs can require higher language and literacy skills than those required to perform the job (Adams & Holden 1998; Mawer & Field 1995). They argued that their participants’ language and literacy skills were sufficient to perform all aspects of their job roles, and they challenged the appropriateness of performance standards that demand a higher level of language or literacy. Charles Darrah (1997, p.258) similarly questioned the validity of setting performance standards that require skills that are not actually used in the workplace. In the following exhibit Fiona points to her own difficulty understanding VET texts to support her argument that an inability to understand Training Packages does not indicate deficient language and literacy skills.

‘Oh! yeah! yeah! That’s the classic! … I think the whole literacy issue’s dealt with appallingly in VET. It’s always been an add-on to everything else, it’s a token gesture. The perception of it is that it is it’s an add-on, it’s a language and literacy problem. But language and literacy is implicit in everything we do. Literacy’s about your functional ability to deal with whatever’s required of you in your working capacity. So they don’t have a literacy problem – I mean, where do you stop? I could probably be classed as having a literacy problem with some of the highfalutin documentation that comes out of my area, and I’ve got a degree in English and a Master’s in English. But I read some of it and go “What the hell does that mean?” And again I think it’s the whole smokescreen thing “Well, I understand it, and if you don’t understand it then there’s something wrong with you” … And you can pass that down “Oh, I can’t have a literacy problem obviously, because I’m a professional. It must be them”, but it’s going down that whole chain thing’. (Fiona)

The interview data suggests that the language of these texts is inherently difficult to understand and that, while this creates particular barriers for participants whose English language and literacy skills are not strong, the issue itself is not one of deficient literacy or language skills. The data suggests that there is something about Training Package competency standards that can prevent even experienced workers making connections between the skills and knowledge described in the standard and those they use on the job.
A number of barriers appear to be inherent in the nature of the competency based learning and assessment process as it is structured in VET. Participants are being required to discursively construct the skills and knowledge that they use on the job in terms of Training Package units of competency. In order to do this they must first recognise their skills and knowledge and then make the connections between their own skills and knowledge and the competencies described in the Training Package unit. These expectations will be examined in turn.

**Recognising the skills and knowledge used in everyday activities**

For a participant to work effectively with a Training Package unit of competency at some point they need to recognise the skills and knowledge that they use in performing their job role. This may seem obvious, but rarely is it explicitly addressed in VET texts and it is a basic point where significant barriers arise. This study argues that people do not necessarily recognise much of what they do as work that involves the application of knowledge and skill. This issue underpins Dorothy Smith’s generous concept of work. Through the institutional discourses of their workplace or profession individuals learn to understand and describe their work in ways that make some elements of work visible and observable, while others remain hidden from view (Smith, D.E. 1987, pp.161-167). Fran Gregor (1994, 2001, cited in Campbell & Gregor 2002, p.72) showed that nurses used knowledge and judgement to carry out a range of essential activities as part of hospital practice but that nurses themselves understood these activities as “helpful” or doing what they had to do to get the job done, but never as “nursing”. Charles Darrah (1997) found that workers on an assembly line initially described their jobs as simple and uncomplicated but fieldwork observations identified a flow of activities and tasks with levels of complexity that needed to be managed and which demanded skills that were not recognised within the workplace. In the following interview extract Angela describes how workplace supervisors undertaking the Certificate IV in Assessment and Workplace Training did not recognise the ‘teaching’ skills that they already used in their everyday work as supervisors.

“They had been doing this a long time every day of their work. They were supervising, they were actually teaching people on the job, they just didn’t know it. No-one told them “Oh by the way,
you know what you just did, you’ve just taught Tom how to … operate the batten saw. You’ve just explained the occupational health and safety elements of this or that”. So they’ve been doing it because it’s something that they are familiar with, and it’s common sense to them. … in a lot of cases these people already they been practising the standards or the performance criteria before the introduction of Training Packages. Now what we trying to do is just put everything into some sort of framework, so for some of them they already got the knowledge, and that somehow we actually have to link what they already know with the new concepts’. (Angela)

The ability to perform workplace tasks without conscious awareness of the skills being used is widely acknowledged and generally regarded as an indicator of proficiency or expertise. John Stevenson (2003a, p.4) stated that ‘Often expertise is so automated that it cannot be easily described’. Stephen Billett (2001, p.23) argued that workplace learning participants who have the opportunity to engage in routine workplace tasks are able to improve their performance to the point where they carry out procedures smoothly and ‘conscious thinking is no longer required’. Even national VET materials have recognised that a ‘skilled performance’ is one ‘which has become fluent and involuntary. … The skill virtually becomes automatic’ (ACTRAC Products 1996, topic 2.1, p.33).

While a participant’s ability to perform tasks without conscious awareness of the knowledge and skills they are using is acknowledged to be a sign of proficiency, paradoxically this ability can complicate the process of making a connection between what they do on the job and the competencies outlined in the unit. This has implications for both learning and assessment. In the following extract Fiona notes that units of competency given to participants at the beginning of a program can seem overwhelming and intimidating, creating significant barriers to learning.

‘I’ve had people, particularly again people new to training in workplaces, where they’ve probably left school early, not done a lot of training, come in and I’ve had people drop out because they feel what they’re faced with is too much. And all I can do, I do all these nice touchy-feely things at the first session, and I keep saying “I know you’re gonna look at this and I know you’re gonna freak out”. And I say that up front, which is probably quite bad, but I’ve had it so many times that people have gone [long indrawn breath], and I say “Honestly, this is not as bad as you think it’s going to be”. And I go through this process of translation and. “All it is is this, I know you’re doing this already”. So you’re trying to win people over before you even get there because you know what’s coming as soon as you whip out the competencies and duck ’cause they’re gonna go “Aaarrgh!” I get that reaction so often’. (Fiona)

As well as creating barriers to learning, there are further implications when a participant comes to be assessed. Tasks such as gathering a portfolio of evidence against a unit of competency demand the ability to consciously recognise and articulate the skills and
knowledge used in performing all aspects of a job role. This demand is a significant barrier for participants who are able to use their skills and knowledge without conscious effort.

**Making the connections between everyday skills and units of competency**

Recognising the skills and knowledge being used on the job is only the first step. Participants must also make the connections between their own performance and the competencies described in the Training Package unit. Once again, this expectation is rarely explored in VET texts despite being identified in this study by practitioners and participants alike as a point at which significant barriers arise. The data suggests that the language of Training Package units puts a distance between the reader and the text and does not reflect how meaning is constructed at the local level. The three language characteristics most criticised at interview were the use of passive voice:

‘Passive voice doesn’t *mean* anything – it’s not *you*. Passive voice is somebody else, and industry didn’t like it. … And I think also a lot of bureaucrats to some extent are very used to writing in passive voice, because that’s the way you tend to do it in official documentation – it *tends* to be done in passive voice. Most people in industry will write stuff in active voice’. (Barry)

abstract language:

‘… if you use abstract terms, a lot of people aren’t able to interpret the abstract term. They need to see things in the context with which they are familiar’. (Peter)

and complex or unfamiliar terms:

[Reading aloud from a unit of competency] “‘Factors affecting the achievement of work objectives are identified and *contingencies* established and incorporated into work plans”. You know, I have to read that and go “OK, well any risks are identified, and solutions are put in place”. I don’t know why you have to say “contingencies *established*” … If I was saying [to my staff] “I need you to put a work plan for what you’re going to be working on for the next week, and any problems that you might encounter, and how you think we can get around them”. I wouldn’t say to them “I want you to factor in any contingencies that might come about”, or “identify factors affecting the outcome of this and come up with contingencies” – that’s just not how I *speak*, and that’s not how the majority of people I work with *speak*’. (Jan)

In a detailed and comprehensive text analysis of a Training Package unit of competency Valda Jennings (2004, p.16) identified these and other grammatical features, describing
the language as ‘abstract, dense and distant’. Units of competency are characterised by grammatical forms that are not commonly used in everyday speech but are widely adopted in workplace documents constructed as part of what Richard Darville (1995, p.254) called ‘organizational literacy’. Responding to organisational literacy texts requires more than just an understanding of the words. Characteristics such as nominalisation and agentless passive highlight organisational processes and leave out the agents who enact those processes. To deal with these texts the reader requires background knowledge to fill in what has been omitted and an understanding of how the texts are used in organisational processes (Darville 1995, pp.256-257). A VET participant gathering a portfolio of evidence for assessment must not only understand the words used in the unit, they also need to understand how their evidence is relevant to the assessment process and how it will be used.

This is further complicated by the fact that the grammatical features identified in units of competency make it difficult for readers to ‘find themselves in the text and to construct social identities, relations, and belief systems that [they] can accept and live within’ (Jolliffe 1997, p.341). That participants have difficulty ‘finding themselves’ in units of competency was evident in the interview data. In the following exhibit Jessica talks about her experience as a VET participant. She explains that the ‘impressive’ language used in the Training Package units she received at the beginning of a workplace assessor course made the content seem ‘complicated’ and entirely new. At the end of the course Jessica found she was able to satisfy all the requirements by submitting work she had already completed. She realised that the course content was ‘nothing new’, it was only the language that was unfamiliar.

‘… when I read the competencies I thought “Oh, I can’t do this”. Because it sounds really complicated, but it’s what I do every day. So like, it was interesting when I did the course on the assessor … I thought “I don’t know how to do this”. And then I realised when I looked at the assessment, I just handed in what I’d already done. I’d already developed an assessment, I’d already validated it, I’d already gone through all that process. I already was conducting them, was doing the follow up. Like I’d just gone through the process because that’s what you do. I thought “This is nothing new”. The only new thing is that it sounds more impressive. … And it’s also that it’s a qualification, and I wasn’t formally qualified, so I just sort of thought “Well I don’t know this, because this is more impressive than what I’ve got”. But in fact I realised that I did know, and I’ve been doing this for years’. (Jessica)
Training Package units of competency do not reflect how meaning is constructed at the local level. Working knowledge is local, highly contextualised, contested and negotiated (Farrell 2001) and the meanings involved in vocational pursuits are direct and powerful (Stevenson 2005). John Stevenson (2003b, p.34) argued that competency based approaches ‘exert control through the codification of meaning’ and that the codification itself and the motives underlying it may not be meaningful to learners. Units of competency describe workplace skills and knowledge using generic labels; such labels are contrived, imposed and arbitrary, and they do not necessarily make sense to participants. For participants to make connections between generic public meanings and their local and contextualised meanings they must learn new ways of making meaning (Stevenson 2005).

The role of the VET practitioner

The difficulties encountered by participants can be further complicated by the rules surrounding the assessment process. An assessment judgement may not be based on what the practitioner making the assessment judgement ‘knows’ about the participant’s everyday workplace performance, even in cases where a participant is being assessed by their immediate supervisor. The only basis for an assessment judgement is a formal assessment process in which ‘quality evidence’ is documented and evaluated against all aspects of the competency standard (ANTA 2004a p.362)

The concept of a standard in competency based training and assessment relies upon all assessors identifying and complying with all mandatory components of a unit of competency. Only when a candidate’s performance exactly and repeatedly reflects that set of mandatory requirements can the candidate be said to have demonstrated that unit of competency. (DET WA 2005b, p.6 [emphasis original]).

The difficulties created when participants struggle to recognise their everyday skills and knowledge and make the connection to the unit of competency are compounded by institutional processes that preclude a practitioner taking into account skills and knowledge being used in the workplace unless these are presented as evidence against the unit of competency.
A supervisor who conducts workplace assessments is undertaking two roles that involve knowing employees in different and possibly contradictory ways and this can give rise to what Dorothy Smith described as ‘bifurcated consciousness’ (Campbell 1998, p.59; Smith, D.E. 1987, p.6). Workplaces are social settings in which work is undertaken by groups of coworkers who bring together a diverse range of skills (Darrah 1997, p.252). Within these specific local contexts supervisors know the people they work with as members of a work group who combine their skills and knowledge to perform everyday workplace tasks. But in documenting an assessment a VET practitioner is required to discursively construct each employee as a separate and individual assessment candidate who has their own knowledge and skills. Further, while a supervisor sees an employee using knowledge and skills in carrying out their job, when conducting an assessment they may only recognise knowledge and skills that can be documented according to the requirements of formal organisational texts. The knowledge that the supervisor has through direct experience is subordinated to the evidence that is constructed in the assessment process, and this ‘power of subordinating local experiential knowing to the discursive is the basis of textually-mediated management and of what Smith calls ruling’ (Campbell 1998, p.59).

Many practitioners respond to these issues by recasting units of competency into workplace vernacular in an attempt to help participants to recognise the skills and knowledge they use in their work and to see the connections to the unit of competency. In the following interview extract Sara recognises the discrepancy between Training Package language and how meaning is constructed in the workplace. She describes her own response, which involves rewriting units of competency in language from the local workplace.

‘In essence, the individual in the workplace constructs their knowledge and understanding of the job and how it works … through basically their workplace experience. Now if, in giving them language that doesn’t relate to the context in which they are working, then they are unable to construct meaning and understanding. So … what I did was write it in the language which they are familiar with in their workplace – so I called a spade a spade. Whatever the tool or workplace artefact was that they used for their job, I called it that. And so they understand then what is required exactly’. (Sara)
Many practitioners adopt this practice of recasting Training Package competency standards into local workplace vernacular. This makes the standards ‘come to life’ and their ‘words are inflected with local and competing meanings and values’ (Farrell 2001, p.210). Contextualising the abstract units to make them meaningful in a local context raises questions about what interpretations will be regarded as authoritative and who has power to determine this.

What meanings are authoritative and who has power?

Each Training Package unit of competency can potentially be addressed in a variety of ways and using a range of evidence depending on the work practices in the particular site in which an assessment is being conducted. In theory, Training Packages provide a framework that supports many different approaches and does not prescribe fixed content (Sanguinetti 2000, p.2). Yet Training Packages do convey a sense that there is, if not a single intended meaning, then at least clear scope for determining that some meanings will have authority while others will not. This is reinforced by their tone of authoritative or imperative command (Jennings 2004, pp.9-10). VET participants typically encounter a unit of competency and ask ‘What does that mean?’ looking for a ‘right’ meaning. The process of determining what a Training Package unit will be taken to mean in a particular workplace is one of determining what will ‘count’ as knowledge in that site (Farrell 2003, p.15).

Training Packages as material texts are exactly the same in every workplace ‘demanding that precisely the same set of social actions count as knowledge production at every site’ (Farrell 2001, p.208). Dorothy Smith (1999b, p.79) called this property ‘indefinite replicability’: ‘[r]eplicability of identical forms of meaning that can be activated in multiple local settings’. Training Packages connect local sites across an entire industry sector, and they also connect those sites to national government agendas. But while the material texts themselves are identical in every workplace, their meaning in any particular site is determined by the unpacking process. Practitioners who implement Training Packages in local sites will only achieve indefinite replicability in meaning if they are able to unpack the Training Package in such a way as to achieve the authorised reading. Individuals who are able to do this have access to positions of power.
‘... I think I’ve become quite passionate about this whole empowered thing because essentially I’ve taken VET through all of those jobs in other sectors and what have you, and the reason is just that I became empowered about using VET language and nobody else wanted to engage with it. But they needed to have somebody who could do it for them because we basically had to work in policy development that utilised the amazing opportunities offered by the VET system after Training Packages came in. But most of my fellow bureaucrats in [my industry] didn’t want to take on the new language so they kept deferring to me. And I became massively empowered … because I didn’t shy away from it’. (Anita)

The need to interpret units of competency raises questions about who has power to determine authoritative readings. Data from this study clearly indicates that in a learning and assessment program it is the practitioner, and not the participant, who has power to determine what the unit of competency will be taken to mean in the local context. This is reflected in the following extract in which Libby demonstrates that, even though she is prepared to negotiate, ultimately she has the authority to decide what meaning will be accepted.

‘... it’s really quite ambiguous, and I as a teacher make the assumption that this is what it means. And if the student goes too far outside that assumption that I’ve drawn, then I’m saying “Well, no that’s not really correct because that’s not the way I’m interpreting it’. … Well then I usually go back to them and I do try and negotiate ... Sometimes I eventually say “No, you’ve really misinterpreted that totally” after sitting and talking to them and I realise what they’ve done and I say “No, you need to readdress that”. And other times I might say “OK, I can see where you’re coming from”’. (Libby)

The following exhibit similarly acknowledges the authority of the assessor to determine what interpretation will be acceptable. When Kevin applied for RPL he disagreed with the interpretation imposed by the assessor who was considering his application. Despite having access to alternative interpretations that supported his own reading of the unit Kevin gathered the evidence demanded by the assessor who occupied the position of power in the process.

‘So I then read through the performance criteria and thought “Yeah I can do this, I can do this”. I then gathered together huge amount of evidence … [The assessor] and I worked through the documentation. What was amazing was, from my perspective, what the terminology meant. … What he was reading into the terminology was totally different to what I was reading into the terminology. And totally different again to what the first person I spoke to was reading into the terminology. … In the end, I went and found additional evidence that met the needs of the person who was going to issue me with the certificate. As an RTO they have the responsibility to make sure that they gather the evidence that is appropriate for what they require, so I went and gathered that’. (Kevin)

While the VET practitioner has power to determine what meaning will be accepted in the specific local context this power shifts as the assessment documentation moves
beyond the local level. In the pursuit of national consistency the AQTF requires VET practitioners to validate their learning and assessment documentation and decisions by comparison with the documentation developed and decisions made by other practitioners (ANTA 2005f, p.11). In these validation sessions each practitioner must defend their local interpretations, often in contexts that are far removed from the specific site in which any particular program was conducted. The records of validation, together with the learning and assessment documentation, are then subject to further examination in an AQTF audit. At this level it is the AQTF auditor who is in a position of power in determining whether the meanings achieved in the local documentation reflect what was intended in the unit. In making this determination the auditor will not necessarily have relevant experience in the industry in which the learning and assessment is being conducted (KPA Consulting 2004, p.45).

Again there is a clear sense that there is, if not one right reading, then at least some meanings that will not be accepted. In the following extract Louise describes how she asked whether she could rewrite units of competency into language familiar to her participants. In response she was advised that she could do this but she had to be careful not to change the meaning.

‘They’re almost like empty shells, some of the sentences. So on the one hand it invites you to interpret it whatever way you want. But on the other hand you always feel uneasy because you’ve got AQTF compliance, inspections, auditors, people – you know. I went to one workshop with a very well known, high profile person who has been an auditor and who also now conducts workshops, and I said to him “Can you write plain language versions for the students?” He said “You can do that, but you want to be damn careful that you know what you’re doing, and that you interpret it strictly according to what it means”. So that wasn’t very reassuring. Because you could have lots of interpretations of some of these things’. (Louise)

This account clearly reveals Louise’s perception of the power relationships involved as she asks someone she describes as ‘a very well known, high profile person who has been an auditor and who also now conducts workshops’ for advice on using Training Packages in her own practice.

Lesley Farrell argued that determining what ‘counts’ as knowledge is not innocent, but is a textually mediated social process in which texts are used to connect the local workplace into wider ruling relations (Farrell 2001, 2003). In some cases the power to
determine what counts as knowledge rests in the local site with those who have authority to negotiate how the externally imposed processes will be implemented (Farrell 2001, p.203). The present analysis has shown that VET practitioners play a key role in interpreting Training Packages within their local sites but the meanings they negotiate at that level must then be defended in processes which are removed from the local context and in which other people occupy positions of power.

Local knowledge is particular, specific, and contextualised, but the textually mediated processes by which this knowledge is recognised in VET are subject to multiple levels of review and standardisation in which the local context is stripped away. What remains is a reified notion of ‘competency’ which is seen to exist entirely separate from particular individuals and local contexts. As it has done with ‘literacy’, VET has nominalised ‘competency’ as an entity instead of activating it as a social practice (Falk 2000, pp.49-50).

**Shifting the policing of and legitimacy for local knowledge**

Drawing on the work of both Dorothy Smith (1999, cited in Farrell 2001) and Norman Fairclough (1996, cited in Farrell 2001) Lesley Farrell argued that workplace educators act as ‘discourse technologists’. Their role involves shifting both the policing of, and the legitimacy for, local knowledge away from people in the local site towards an anonymous external authority (Farrell 2001, p.211). Shifting the policing of local knowledge involves the explicit use of authority and can be achieved through means such as imposing external standards. Shifting legitimacy is more difficult because it requires authority to be shifted in such as way as to render the external institution anonymous and make its demands ‘seem transparently natural and right, just “best practice”’ (Farrell 2001, p.211).

If an employee structures their workplace practice so that it complies with the performance standards specified in a Training Package then the policing of local knowledge shifts to external VET authorities. If, in structuring their practice in this way, the employee is consciously complying with an externally imposed requirement then the legitimacy for local knowledge remains with the local site. If the Training Package
performance standards become integrated into the local workplace in such a way that employees accept them as the right, natural and best way to do the job then the shift in legitimacy has been achieved. Employees are no longer adopting certain practices because the Training Package requires them to; they are adopting them because they accept those practices as local benchmarks for good performance.

The data from this study suggests that the implementation of Training Packages has largely succeeded in shifting policing of local discursive practice from the local workplace to the VET regulatory framework but the shift in legitimacy is not yet complete. The shift in policing has been achieved through the explicit regulatory authority of Training Packages and the AQTF to determine what constitutes competent performance, how competent performance is judged, and who is authorised to make this judgement. The authority of the practitioner is based, not on their position in and knowledge of the specific workplace, but on the qualification requirements outlined in the AQTF and an ability to work with the Training Package being used in the assessment (ANTA 2005f, p.9). The practitioner’s expertise lies in their ability to implement a formal and decontextualised process (Farrell 2001, p.211). Even a practitioner from an RTO external to the organisation can occupy a position of authority despite having little or no knowledge of the local workplace, expertise in the substantive work practices within that workplace, or established position within the hierarchy of the organisation itself (Farrell 2000).

Some shift in legitimacy is reflected in the wide acceptance of Training Packages as industry benchmarks. Such is the status of Training Packages at VET policy level that apparent discrepancies between local performance and Training Package standards does not call into question the status or accuracy of the standards themselves. Paradoxically, these discrepancies can serve to reinforce the status of the standards as ruling texts. The interview data revealed that participants who are acknowledged to be competent employees in their local workplace are often unable to understand the applicable units of competency. This can be constructed as evidence that the standard of performance accepted in the workplace is inadequate when compared to the established national benchmark. In such cases, insisting that the participants align their local performance to
the national standard before they can be formally assessed as competent is seen as a process of encouraging improved workplace performance. Such an approach establishes the discrepancy between the extralocal Training Package standard and the vernacular of local workplaces as a problem that the local VET practitioner must solve. This directly engages practitioners in bringing the social relations of VET into the local sites in which they work (Campbell 1998, p.62).

The interview data from this study indicates that, while VET practitioners and participants criticise the *language* of Training Packages, only occasionally do they challenge the use of these texts as the legitimate basis for workplace learning and assessment. Yet such challenges do occur. In some cases a unit of competency will require participants to demonstrate practices that are either inappropriate or simply not possible in a particular local context. This was illustrated in an exhibit presented in the previous chapter where Louise read part of a unit of competency and protested ‘[b]ut *that’s not how we work*.’ In such cases the Training Package standard is highly visible at the local level and resistance to the shift in legitimacy is evident. In the following interview extract Marion expresses frustration that volunteer firefighters in an entire Australian state are unable to obtain certification because the applicable units of competency specify the use of equipment that is not available.

‘… one of the points that came up with the bushfire fighters who are mostly volunteers, even in the wildfire unit of competency “Respond to wildfire”; which is basically squirting wet stuff on hot stuff as they say … The range of variables for that is full on and it all says “must include” these things, and talking to the career firefighters who train farmers and bushies to look out for their properties, they said “No way in a million years would any of those people be exposed to any of these things, have to know about any of these things, never mind be assessed on any of these things”. … I tried to find out about the “must” issue, and I found conflicting bits of evidence in some of the booklets from the department. Their policy compliance officer has tried to find out, same sort of scenario. … There are certain pieces of equipment listed that they *must* include, that nobody out there – no bushfire brigade in [this state] has got. Don’t need ’em, ain’t ever gonna get ’em, so why is it a “must”? … I have to admit that sometimes we’ve said we *can’t* achieve that, and it’s not fair on the people who are going for this particular qualification. Most of the people aren’t even going to get a qualification out of it, they’ll just get random units of competency, and they’ll never get enough for a Certificate II. But let’s give them *something* and they’re not going to get it because of one stupid piece of equipment or one procedure that’s just not followed here’. (Marion)

Marion accepts the power of external authorities such as the Training Package itself and ‘the department’ to *police* local judgements about competency but she challenges the
legitimacy of externally imposed requirements that have no application in the local context and are seen to disadvantage participants.

**Drawing the argument together**

The discussion to this point has drawn on interview data to gain entry into local workplace settings in which Training Packages are activated. It has argued that, through their participation in workplace learning and assessment, individuals are constructed as workers who are either ‘competent’ or ‘not yet competent’ based on their ability to produce ‘quality evidence’ that documents their knowledge and skills in terms of Training Package units of competency. Training Packages are abstract texts that stand in for local meanings that are specific, contextualised and contested.

The discussion presented two propositions: that people do not necessarily recognise much of what they do as work that involves the application of knowledge and skill; and that the language of Training Package units puts a distance between the reader and the text and does not reflect how meaning is constructed at the local level. These issues represent significant barriers to participants seeking to engage with Training Packages, yet neither is acknowledged in the discussions surrounding learning and assessment within VET.

Many VET practitioners recognise the discrepancy between the organisational literacy of Training Packages and the vernacular of the workplaces in which they work. They challenge the presumption that this discrepancy represents deficiencies in either local workplace performance or literacy levels. Practitioners argue that the language of VET texts is inherently difficult to understand and that it acts to exclude competent employees seeking to have their skills recognised. A common strategy for overcoming these barriers is to recast the unit of competency into workplace vernacular, but this raises questions about who has power to determine what reading will be regarded as authoritative. At the local level it is practitioners and not participants who have power to determine what will ‘count’ as knowledge, but beyond the local level this power shifts as practitioners defend their interpretations through multiple levels of review in which the local context is stripped away. The discussion has argued that, while the policing of
local discursive practice has largely shifted from the local workplace to the VET regulatory framework, the shift in legitimacy has not been fully achieved.

Participants and practitioners in local workplace learning environments challenge the language of Training Packages but they seem not to challenge the standards themselves unless particular units of competency specify practices that are deemed inappropriate in the local context. Yet the status of Training Packages as a legitimate basis for workplace learning and assessment is grounded in a public assertion that these texts are developed by industry and represent industry benchmarks (DEST 2005b, p.1; DET Qld 2003, p.5; Schofield & McDonald 2004, p.5). Exploring this assertion draws attention to the processes by which Training Packages become authorised as ruling texts that socially organise local learning and assessment practice and connect it to national VET agendas.

The institutional processes involved here only become visible when you leave the local site and do some ‘detective work’ (Campbell & Gregor 2002, p.60). The following discussion will draw on both levels of data generated in this study: interview data and examination of official VET texts. It will argue that Training Packages are government texts that are developed with industry input and that their authority as ruling texts which organise local workplace activities is derived from their endorsement by government and their status as part of the VET regulatory framework.

How do Training Packages become authorised texts?

An examination of the texts that govern Training Package development confirms that industry does play a key role, but it also draws attention to the significant role played by government funding bodies and regulators. The development and endorsement of Training Packages is overseen and managed by national VET authorities. The primary text that governs the process is the *Training Package Development Handbook* (ANTA 2004b), which is published at national level and specifies requirements for all aspects of Training Package development including research and development, styles and formatting, and endorsement processes. Associated with the Handbook is the national
Policy for Training Packages (ANTA 2003a, p.3). Figure 5, which appears on the following page, represents the Training Package development process as a flow chart and is based on information drawn from these two texts.

Figure 5 represents the process as defined prior to the abolition of the Australian National Training Authority in 2005 and the transition to new national governance arrangements between June 2005 and January 2006. These changes will see the roles played by ANTA and the National Training Quality Council transferred to other national VET authorities. At this point there is no indication of any substantial change in the overall structure of the Training Package development process or the roles played by Industry Skills Councils, the Department of Education, Science and Training, and state and territory training authorities.
### Organising workplace practice through national competency texts

| Industry Skills Council (ISC) business plan identifies priority need for new Training Package |
| Industry Skills Council business plan approved by ANTA. Funds allocated for Training Package development. |
| Industry Skills Council consults widely across industry sector, employee and equity groups to develop draft Training Package |
| Industry Skills Council validates draft, consulting industry and state and territory training authorities (STAs) |
| Validated draft is checked against: |
| - Training Package Development Handbook |
| - National Training Information Service database |
| - National Training Quality Council (NTQC) Quality Criteria |
| - Australian Training Products (ATP) publication requirements |
| Draft Training Package evaluated by: |
| - ANTA |
| - State and territory training authorities (STAs) |
| - Department of Education Science & Training (DEST) |
| ANTA submits draft to NTQC for endorsement |
| ANTA seeks approval from state / territory training ministers for endorsed Training Package to be published |
| Each STA develops an Implementation Guide governing public funding of Training Package programs in their jurisdiction |

Figure 5: Training Package development process (ANTA 2003a, 2004b)
The claim that Training Packages are benchmarks developed by industry appears to be based on the official account of the process represented in Figure 5. This account identifies Industry Skills Councils (ISCs) as the bodies that develop Training Packages, but an examination of the texts that govern this process clearly shows that both industry and government play a role. To describe Training Packages as being developed by industry only tells part of the story. The following discussion will use both levels of data from this study to elaborate on the process represented in Figure 5.

**The role of industry in Training Package development**

The *Training Package Development Handbook* represents Industry Skills Councils (ISCs) as the key drivers of the Training Package development process. An ISC identifies the need for a new Training Package, consults widely with businesses across the industry to develop and validate a draft, and negotiates changes requested at any of the later stages leading to final endorsement. Once the draft Training Package has been validated ‘industry’, in the form of peak industry bodies, plays a role in the National Training Quality Council (NTQC) endorsement process as six NTQC positions are allocated to representatives from employer groups (ANTA 2005g).

A number of informants in this study had participated in Training Package development or review processes, some as members of national project teams and others by contributing to industry consultations. Informants questioned the extent to which industry drives the process. Several informants pointed to the increasing trend of Industry Skills Councils subcontracting the development work to specialist consultants (Smith, E. & Keating 2003, p.63). Informants argued that this practice sees Training Packages being developed by people who have expertise in the *process* but who lack knowledge of the *industry* for which the Training Package is being developed.

‘… what we have now is a group of people who are highly developed Training Package developers, who probably – and I’m being very contentious here – probably aren’t listening to the job role people any more because they think they know it all. I’m just putting out there as a red rag to a bull possibly. These are very mysterious people, the people who get the contracts to do that sort of work. Who are they?’ (Anita)
Regardless of whether the development is undertaken by an ISC or a consultant, the process involves consultations conducted as part of the development and validation of drafts. Some informants questioned the efficacy of these industry consultations, suggesting that Training Package developers consult with senior staff who have limited contact with day to day job roles and that the perspectives of large corporations are given priority over those of smaller businesses.

‘Oh yeah, come on, go back – which industry are we talking to? Come on, have a look at the players on the field. They’re not necessarily the people from the ground force or the coalface of that industry, they’re actually the people at higher level from the industry who quite often are far removed from what’s going on. I don’t know how people think industry actually drive anything, it’s driven by a whole range of people who call themselves industry but … I think the question needs to be asked “in whose interest” you know. It’s not in the interests of [industry peak bodies] to have more inclusive relationships at the micro level. It’s better to have it all fuzzy and warm or they’ve got the ear of the Minister, and it suits that particular political forum. Because that’s what happens when you get to that higher level where the funding and the power is, it’s actually being driven by people at that level not being driven by what the local chair manufacturer wants. He doesn’t have a voice, nobody cares what he wants. I mean, heaven forbid he should come and say “Look, I need someone who can actually turn a bit of timber here”. I mean, goodness gracious!’ (Paul)

When employees from local industry workplaces have the opportunity to participate in Training Package development their input is organised by the textual demands of the process. Dianne Mulcahy (1996) reported that input from skilled workers is socially organised by text mediated processes such as task analysis processes, constraining input and preventing workers from incorporating components that they regard as essential to competent performance.

Once the draft Training Package has been developed it is validated through consultation with industry, but again the interview data from my study raises doubts about this process. One informant described her involvement in a validation process. When she expressed strong concern about a draft unit of competency she was told that it was too late to rewrite the draft, it would be revisited when the Training Package came up for review (three years later). Other informants suggested that the language used in draft Training Packages is often so difficult to understand that industry representatives who do not have VET experience are unable to provide meaningful feedback. Several informants questioned whether Training Package developers necessarily act on the issues raised by industry.
‘Complaints that I’ve heard, and I’ve heard them across quite a few industries, are that they’ve put input into what they want in the Training Package, but something happens between what they say and the actual production of the Training Package, and their message gets lost. … Now that’s a complaint that’s been around ever since the Training Packages came in. So I don’t know what happens to their message. It does seem to get lost along the way’. (Renee)

‘I’m trying not to snigger. Cause I think a lot of it is token stuff to be honest. I think what happens is, and I’ve been on different things … And I’ve gone along to different advisory committees. And I think you can put in your, sometimes very impassioned, pleas and arguments. And they all go “Yeah, yeah, yeah, yeah, but this is what we’re staying with” And I’ve experienced that so many times that I feel that… I think it goes on in VET: “Yeah, we’ll consult with industry and see what they want, blah blah blah”. And we just come away and go back to what we want and what fits us anyway. … I think what happens is we tend to come back and say, “You know that’s a fair point. However, how it should look and how it must be is this”. And we come back to things like “But the Training Package guidelines say this, and this is how it should be set out” and all the rest’. (Fiona)

Fiona’s comment reveals how input from industry is reshaped in response to the text based guidelines that govern the Training Package development process. Overall informants in this study expressed a lack of confidence in the ability of the existing processes to identify and incorporate issues expressed at the local workplace level.

The role of government in Training Package development

Government agencies play a major role in Training Package development. State and territory training authorities (STAs) are directly involved in both the validation and evaluation of a draft Training Package. They participate in the endorsement process through eight state and territory representatives on the National Training Quality Council (NTQC) (ANTA 2005g). They also provide advice to government ministers when the endorsed Training Package is submitted for ministerial approval. Before a newly endorsed Training Package is allocated public funding within a state or territory the training authority for that jurisdiction must develop an implementation guide. RTOs must apply to the local STA for approval to add the new Training Package to the range of programs they offer.

National government interests are also involved in the process at several stages and through different agencies. The development of a new Training Package only commences if the priority need identified by the industry skills council is approved by national VET authorities. Once commenced the entire process is governed by the Training Package Development Handbook. National government requirements act as
Organising workplace practice through national competency texts

benchmarks when the validated draft is checked against other texts and processes such as the national database, quality criteria, and publishing requirements. When the draft Training Package enters the evaluation phase, national authorities develop an evaluation paper for distribution with the draft, and they also facilitate the evaluation discussions. The Department of Education Science and Training (DEST) participates in the evaluation process, and also in the endorsement process through the DEST member of the NTQC (ANTA 2005g). DEST also advises the commonwealth minister regarding ministerial approval.

**Training Packages: industry benchmarks or government regulatory texts?**

The High Level Review of Training Packages (Schofield & McDonald 2004, p.14) described these texts as the ‘negotiated outcome of a complex set of interactions and relationships between individuals and organisations within and beyond the VET system. … Training Packages are designed, developed and implemented in and through an inherently complex and human system involving many parties all with a legitimate interest in them’. Giselle Mawer and Laurie Field (1995, p. 39) similarly drew attention to the competing priorities involved in the development of VET competency standards, arguing that ‘achieving consensus can be tortuous … the outcome is always a compromise … The whole process tends to reinforce the status quo’. Charles Darrah (1997, pp.266-267) argued that formal statements of skill requirements are ‘constructed through a social process’ which is ‘an act of power with enormous organizational consequences’.

Examination of the texts that govern the Training Package development process clearly establishes that, while industry plays a key role in developing and validating the initial draft, the most powerful positions in this process are occupied by government. VET authorities define the parameters, manage the process, and at several key points have power to approve or not approve drafts developed in industry consultation.

Some accounts of the Training Package development process make little or no reference to the role played by government. They move directly from industry development to
implementation issues with only a brief acknowledgment that Training Packages are endorsed by government (Smith, E. & Keating 2003, p.63 & pp.151-153). The objective of the present analysis is not to make any judgement on the role that industry should play in defining educational outcomes, but simply to highlight the inadequacy of accepted assertions that Training Packages are benchmarks developed by industry. This assertion obscures a complex process which at every stage is socially organised by government texts and priorities. The status of competency documents is not based on the extent to which they accurately reflect workplace reality but depends on ‘the conditions of their production as an organizationally warranted account of the workplace and their officially designated status as the basis for institutional action’ (Jackson 1995, p.169 [emphasis original]). As standardised descriptions of job related skills Training Package competency standards play a part in the operation of the labour market by constituting competence as a labour market commodity (Smith, D.E. 1990b, p.219).

The status of Training Packages as texts that arise from and are connected to national government agendas is explicitly acknowledged in official VET statements (ANTA 2003b; DEST 2004b; Schofield & McDonald 2004, p.7). The connection between national VET policy and government political and economic agendas has been a major part of the public rationale for VET policy since the inception of the National Training Reform Agenda. Changes to vocational education were introduced as an integral part of a package of national government micro-economic reforms which also introduced changes to industrial and labour market regulatory arrangements (Butler & Ferrier 2000; Stevenson 1993). The ideology of economic rationalism was the force driving VET change, with the focus not on vocational education and training needs but rather on ‘radical and fundamental structural changes to this society’ (Hawke & Cornford 1998, p.107). Competency approaches such as those adopted in VET are ‘a particular way of looking at workplaces, the people in them, and the activities they perform’ (Darrah 1997, p.250). This approach focuses on workers as individuals with bundles of skills rather than on workplace structures themselves (Darrah 1997, pp. 250-252).
The implications for language

Training Packages are government texts, developed with industry input, but developed to comply with criteria defined by government policy and enforced through official texts. The language used in Training Packages is not the language of the industry for which each is developed but is the official language form used in the written texts that comprise the regulatory framework within which Training Packages are governed. People use narrative literacy as a means of expressing their experience and ‘naming their world’ (Friere 1972, 1985, cited in Darville 1995, p.250). The data from this study shows that people who participate in industry consultations conducted as part of Training Package development use narrative literacy to ‘name their world’ (or at least, to name their job roles) only to see their input rewritten in organisational literacy terms. The result is a Training Package competency standard as a ruling text that names a world which people at the local level are unable to recognise and which does not seem to have a place for them.

The interview data clearly identified the use of passive voice, abstract terms, and complex and unfamiliar words as three language characteristics that make Training Packages difficult to understand and work with in a local context. The source of these characteristics will be briefly explored drawing on data from interviews and examination of texts. The discussion will argue that the power relations and national texts that govern Training Package development organise the process both on a formal level through explicit requirements and also on an informal level through practices that see certain language forms privileged as being those appropriate to VET texts.

The use of passive voice in units of competency was widely criticised by informants. The Training Package Development Handbook explicitly advises that the use of passive voice for performance criteria is ‘preferred but not mandated’ (ANTA 2004b, pt.1, ch.1, p.21). This advice is stated without further elaboration or discussion. Both the interview data from this study and the wider literature on language (Darville 1995; Joliffe 1997) indicate that the use of passive voice in workplace texts can obfuscate meaning and create barriers to readers seeking to engage with the texts. Yet such is the power of
national government texts in VET that the procedural preference for passive voice is given precedence over considerations such as accessibility and readability.

The abstract language typically used in Training Packages arises in part from the wide coverage demanded of Training Package competency standards. Within the government agenda of national consistency and the ‘fully integrated national VET system’ (Mitchell & Young 2001, p.5) each Training Package is developed to cover an industry sector rather than a particular workplace. Training Package competency standards are ‘used to constitute the ‘actual,’ to stand in for workplace reality’ (Jackson 1995, p.169) for an entire industry sector on a national basis. The Training Package Development Handbook requires that ‘units of competency should have sufficient breadth to reflect a broad based expression of the application of knowledge and skills … in a variety of enterprises’ (ANTA 2004b, pt.2, ch.2, p.8). Yet different local contexts within the same industry may require very different local performance standards. Consider, for example, the different local table and bar service standards that might be acceptable in a suburban bistro compared to the expectations in the signature restaurant of a 5-star international resort. In the VET policy framework both local contexts must be encompassed in units of competency that are applicable to the hospitality industry as a whole. This dilemma is illustrated in the following extract from a published paper on workplace assessment; it quotes an automotive industry assessor discussing assessments in motor vehicle spray-painting:

I’m doing two people on the same day. One at a taxi organisation, one at a Porsche dealership. Now the quality, the standard, in the taxi place is get the bloody thing out, it’s a money making machine. I don’t care just as long as it looks yellow, get it out there, all right. The Porsche, totally different isn’t it? Right! It’s got to be this mirror finish, the exact same colour, and the customer’s got to be happy because the car’s worth $100,000. (Jones 2002, p.1)

The spray-painting competency standard referred to in the above extract includes the performance criterion: ‘All inspecting and repair operations are carried out according to industry regulations / guidelines, OH&S legislation, statutory legislation and enterprise procedures / policies’ (ANTA 1999, cited in Jones 2002, p.1). The use of abstract and generalised language punctuated by ‘catch-all’ phrases such as ‘enterprise procedures / policies’ is the strategy used by many Training Package developers to meet the challenge of defining national performance standards applicable to all local contexts.
This strategy results in ‘a homogenised or standardised version which attempts to be everything to all, but is likely to be so generic and undifferentiated and mean nothing to most’ (Anderson 2000, p.35). The resulting generic competency standards can make Training Package qualifications attractive to managers who need to ensure that large numbers of employees are trained to a comparable level, but it is unlikely to address local skill ‘nuances’ (Smith, E. et al. 2004, p.169). Many informants in my study, while strongly critical of the impact of abstract language, appeared to accept that it was inevitable in industry-wide competency standards.

‘I think that’s part of the problem, because it’s put together by industry, and they have to address all the generics, and you have everybody from every State and Territory sitting around the room, part of that is the problem’. (Vanessa)

This reveals an acceptance of the national VET agenda of national consistency achieved through the application of broadly based performance standards across an entire industry. It also suggests some level of acceptance of the shift in legitimacy from local workplaces to external authorities.

The use of passive voice and abstract terms in Training Packages arises from explicitly stated official policy. It is less easy to identify why Training Package language is characterised by the use of complex and unfamiliar terms. On the surface this appears to be at odds with the advice given in the *Training Package Development Handbook* (ANTA 2004b, pt.2, ch.2, p.4) which states that ‘[u]nits of competency must be able to be read and understood by those who use them – for example trainers, assessors, employers, employees and supervisors. This relates not only to their content, but also to their language and structure’. It is difficult to see that competency standards such as those unpacked by Libby and Louise in the previous chapter and the various examples presented elsewhere in this thesis are consistent with this advice. The interview data suggests that, as with other language characteristics, the complexity of Training Package language arises in response to other VET texts. In this case, however, it seems that national texts organise the process in an informal sense through everyday practices that involve the acceptance of a particular language form as being the language appropriate to official VET texts.
Several informants who had themselves written national units of competency described consciously using existing Training Packages as models. The impact that this practice has on language is evident in the following account by Jessica.

'We wrote our own course with our own set of competencies. But it took me ages, because I had to try and structure it, and getting the wording right. ... It’s written in bad language, because I copied the Training Package. ... That’s the only way I could write a nationally recognised course, was I had a document to fill in, and I filled in the gaps, which told me what I needed to do. And then I compared my gap-filling-in to some of the other Training Packages just to see if I got the language right. That’s how I wrote my nationally accredited course. I plugged the gaps using the language I saw elsewhere, because I thought “If that’s the language they understand, let’s speak it. If we speak French, you put it in French. If they speak this jargon, you put it in the jargon”’.

(Jessica)

Several informants suggested that Training Packages use the language of what they referred to as the ‘VET industry’, acknowledging the development of a recognisable language form that some call ‘VET speak’. This language form is becoming established as a prestigious discourse that gives some people access to powerful subject positions while excluding others (Fairclough 1989, p.64). VET speak is very much ‘part of the power of those who have power’ (Darville 1995, p.250). Increasingly regarded as the language of the VET profession this language appears to have colonised Training Packages in a wide range of industry sectors.

The use of passive voice, abstract terms and complex words illustrates how the official texts that govern the development of Training Packages organise the process both formally and informally. These texts impose a particular form of organisational literacy that is aligned to VET processes rather than the needs of local contexts. The fact that Training Packages use this language form rather than some version of vernacular used in the industry that each Training Package covers is an additional signifier that Training Packages are VET texts, part of a government agenda, and not industry texts aligned to local workplace needs. Yet these texts have achieved a high level of acceptance as industry benchmarks which provide an appropriate basis for workplace learning and assessment programs.
Room for resistance

In highlighting challenges, difficulties and limitations that are recognised at local level but not acknowledged in policy texts there is no intent to be deterministic or to convey a sense of hopelessness. The interview data reveals that there is resistance to the external imposition of narrow approaches that shift policing and legitimacy away from local sites. At the level of local practice some practitioners respond to the spaces provided by VET discourses and text based practices by ‘using their available identities as resources with which they ‘work’ (and rework) discourses to generate new identities … with which they can live’ (Farrell 2000, p.21). Even literature that is critical of the narrow and socially reductive approaches reflected in national VET agendas acknowledges that experienced practitioners can work with texts such as Training Packages to provide scope for innovation and creativity, and to engage and empower participants (Anderson 2000; Waterhouse 2000). The interview data from this study reveals that some VET practitioners are using Training Packages to create spaces in which meaningful learning can occur. This will be explored as a key theme in the following chapter.

In relation to the specific practice of confronting participants with uncontextualised units of competency, a number of resistant approaches emerged in the interview data. Some VET practitioners have adopted local practices which enable participants to complete entire VET qualifications without ever encountering a unit of competency. Other practitioners hand out copies of units but do so in ways that subtly discourage participants from actually reading them. This approach includes practices such as providing the unit as a separate document and explicitly advising participants that there is no requirement to read it, or placing it as the final appendix in a large set of course materials in the expectation that most participants won’t bother looking that far. Some practitioners provide the unit of competency but also provide a plain language version and work exclusively from the plain language version in dealing with participants. In

---

5 Anecdotal evidence that does not form part of the data for this study suggests that in some cases practitioners print units of competency on coloured paper to clearly distinguish them from the material that participants are expected to read.
most cases, however, practitioners who provide uncontextualised units of competency described spending considerable amounts of time explaining the units and encouraging participants who they perceive to be at risk of being discouraged.

VET participants also resist the imposition of this institutional language but their scope to do so is constrained by their lack of power in the learning and assessment process. Interview data reveals that resistance on the part of participants includes openly (and, at times, aggressively) challenging why they are being issued with material that is incomprehensible and demanding that the units be explained. A number of informants stated that, although participants are given units of competency, they do not read them.

‘I’d suspect that the average student doesn’t even read them. What’s happening here is that we are saying that we have satisfied the needs of supplying them with information. It’s probably a bit like one of things on the Internet where you have “Here’s all the terms and conditions, click on the agree button”. People just click on the agree button and never even read the conditions. To me it’s the same sort of thing’. (Mark)

A significant concern to emerge in the interview data is the suggestion that some participants ‘resist’ by disengaging from the learning or assessment activity they are involved in. In one form this disengagement involves ‘zoning out’ or losing interest while remaining physically involved. It can also take the form of actually withdrawing from a program entirely. Fiona was one of a number of practitioners who described forms of resistance that had negative consequences for the participants themselves.

‘I mean, it depends on the actual personality type, but I’ve had two different types. Either … you get that initial that “I’m not good enough and I can’t do it”. Or you get the other side where you get the real – same sort of thing that’s going on, but different reactions, and they become quite: “Oh, that’s a lot of crap. Who wrote this rubbish? Who knows what I’m doing? They don’t know anything about… What’s the point of this? It means nothing”. So you’ll get those two, but either one can actually alienate people from accessing the training and understanding it. Each reaction has the same outcome. It really makes people hostile and distanced from it, and it is through the language, I think, a lot of the time’. (Fiona)

While VET practitioners resist the imposition of national agendas through the practices they adopt at the local level, there are limited opportunities for participants to resist while still accessing the benefits of national qualifications.
Conclusion

Building on the argument that was summarised on page 132, this analysis has revealed that Training Packages are government regulatory texts that stand in for local workplace practice and connect that practice to government policy agendas.

While industry plays a key role in identifying the need for a Training Package and developing the draft, government authorities occupy the most powerful positions in developing, endorsing and implementing these texts. The entire process is organised by and subject to government requirements.

What each unit of competency means in any local workplace is determined by a VET practitioner whose authority is derived, not from their position in the particular workplace but from the requirements specified in the AQTF and the Training Package in question. These local decisions about what will count as knowledge must be defended in validation and audit processes in which the local context is stripped away and the power of the practitioner to determine local meanings shifts to an external AQTF auditor.

The status of Training Packages as government texts is reflected in the characteristics and operation of the texts themselves. Purported to be industry texts, they are typically written in the institutional language of the VET sector rather than language used in the industry sector that each relates to. Practitioners and participants alike struggle to understand this language and to make the connections between local workplace practice and the requirements specified in the Training Package. Despite this, the status of Training Packages as industry benchmarks is unproblematically asserted in official VET texts and accepted in VET literature. These assertions are central to the widespread acceptance of Training Packages as an appropriate basis for judging local workplace performance. Informants in my study challenged the language of Training Packages, but only in a few cases did they question the use of the texts themselves as the basis for making decisions about competence.

This analysis reveals that Training Packages have become established as authorised texts, and through their use the policing of what will count as workplace knowledge has
shifted from people who enact practice in local sites to external VET authorities. But the shift in legitimacy has not been fully achieved. In some cases Training Packages remain highly visible. While VET practitioners accept the authority of these texts, they recognise the barriers created by institutional language and inappropriate performance requirements.

The shift in policing achieved through the authority of Training Packages has a further significance. VET practitioners work in an environment where the use of abstract national standards to make judgements about local workplace practice is well established. The authority of practitioners to make judgements of competency without necessarily occupying positions of power within the local site itself is also established. When the AQTF was introduced in 2001 it introduced a new set of abstract national standards and created new positions of authority to be used in judging local learning and assessment practice. The established and accepted arrangements for constructing local employees as ‘competent’ or ‘not yet competent’ were extended into arrangements for constructing VET practitioners as ‘compliant’ or ‘non compliant’. The following chapter will explore the impact this has had on the authority of VET practitioners to make decisions about local learning and assessment practice.
Chapter Seven: ‘You’re never quite sure if you’re right’: Organising learning and assessment practice through national quality texts

Introduction

This chapter addresses the second element of my problematic, exploring how local learning and assessment practice is socially organised and shaped by the use of the Australian Quality Training Framework (AQTF) to make judgements about compliance. It will argue that implementation of the AQTF achieves a textual mode of governance that shifts authority for decisions about learning and assessment both within local sites and also from local sites to external VET authorities.

In focusing on how the AQTF is taken up and enacted by Registered Training Organisations (RTOs) this chapter will further examine several themes that emerged in the previous chapter. The discussion will draw on interview data and examination of official texts to identify and explore a number of resonances between the status and operation of Training Packages and the status and operation of the AQTF. The analysis will argue that the AQTF is an authorised text that stands in for local learning and assessment practice, and that power to determine authoritative readings of the abstract text rests with those who use it to make judgements rather than those whose practice is subject to judgement.

Practitioners in this study described a range of different approaches to language use in workplace learning and assessment, and exploring these approaches brought into view fundamentally different perceptions of what is possible within the VET regulatory framework. Different readings of the AQTF have significant implications for the freedom of practitioners to exercise their professional judgement in decisions about their own local practice. The following discussion will reveal the role that some readings of the AQTF play in shifting the policing and legitimacy for local decisions about learning and assessment away from education professionals towards authorities who have power in audit and compliance.
The discussion will argue that this shift is happening on two levels, only one of which is visible in local sites. The formal regulatory power of the AQTF shifts authority from local sites to external VET authorities, and this shift is recognised by practitioners. The power of RTO management to determine how compliance will be achieved within their organisation shifts authority for determining learning and assessment practice from practitioners to managers and administrators. This shift in authority within the local site is obscured and not widely recognised by VET practitioners.

The discussion will argue that increased emphasis on the hegemonic policy goal of national consistency has potential to reduce all practice within VET to narrow approaches that are fundamentally inconsistent with good educational practice. The chapter will highlight the impact that established divisions between different RTO types and professional identities have on the ability of practitioners to effectively resist this hegemony.

The analysis begins with a discussion of the interaction between Training Packages and the AQTF.

**Competency texts and a quality framework in a ‘symbiotic relationship’**

As ruling texts that socially organise local activities, competency based training approaches and quality management approaches subordinate and displace the authority of people at the local level, shifting the authority to decide what will count as knowledge from the local site to external forces (Campbell 1998; Farrell 2001; Jackson 1995). The National Training Framework is a textually based system in which Training Packages and the AQTF are ‘intimately intertwined’, operating in ‘a symbiotic relationship’ (Schofield & McDonald 2004, p.8). Training Packages define competency based performance standards for local workplace practice and the AQTF defines compliance standards for local learning and assessment practice. By overlaying a national competency based system with a national quality framework ruling is achieved through layers of texts which act individually and together to shift authority from local sites.
A key element of quality systems is standardisation or ‘deciding the best way to do things and then ensuring that these methods are followed consistently’ (Jackson 2000, pp.5-6). Within the diversity of content, contexts and participants in the VET sector, it is doubtful whether there can be one ‘best way to do things’. Official VET rhetoric encourages innovation, flexibility and responsiveness (ANTA 2003b; Dawe 2004; WADoT 2002b, p.4), and research shows that VET practitioners modify their delivery in response to needs they identify in their interaction with each group of participants (Smith, P. & Dalton 2005; Tyzack 2004). Yet compliance with the AQTF requires RTOs to document and adhere to standardised local processes.

The language of the AQTF is open to wide interpretation, and each standard can potentially be addressed in many different ways depending on the context in which it is being read. People do not simply take on the standardised work practices and identities imposed by quality procedures; they negotiate meanings and ‘work’ the discourses, interpreting the texts and generating ‘quality’ responses that have a local flavour (Farrell 2000, p.23; 2003, p.12). Data from this study reveals that the AQTF is taken up and activated differently in different RTOs leading to fundamentally different understandings of what is possible within the VET regulatory framework. The different readings range along a continuum from broad readings that support a focus on addressing local needs, to narrow and rule bound readings that take the national texts themselves as their primary reference point. Where the reading achieved is towards the narrow and rule bound end of the continuum the displacement of local practitioners’ authority is powerfully evident. The following discussion will briefly introduce these two readings, bringing them into view in the manner in which they emerged in the fieldwork by exploring whether or not participants at the local level are confronted with Training Package units of competency.

The AQTF requires RTOs to provide participants with information about a range of matters including course content and outcomes, support services, access and equity policies, and assessments (ANTA 2005f, p.8 & p.10). The account of VET practice presented in Chapter 5 revealed that widely different interpretations of the AQTF lead to different local practices. Exploring an RTO’s approach to providing information to
participants provides a window into their overall approach to compliance with the VET regulatory framework.

‘You actually don’t want to give somebody the Training Package’

A number of informants argued that there is nothing in the AQTF that requires RTOs to give participants uncontextualised Training Package units of competency. These informants argued that all information required under the AQTF should be provided in language that is meaningful to the participants.

‘Where does it say that? No. It says you must give students information about what they will learn and how they will be assessed. And what the outcomes will be. … Yeah. Where does it say that? How does a student understand the context of assessment from trying to give them a Training Package … how do they know what you’re going to do?’ (Taryn)

Several practitioners described local practices in which learning and assessment programs are conducted entirely in workplace vernacular enabling participants to complete entire qualifications without ever encountering a unit of competency. In some cases practitioners recast the units into more familiar language while maintaining the original unit structure; they then use these ‘plain English’ units as the primary reference point in learning and assessment activities and documents.

‘I now develop my own [assessment tools] and the process is I take the Package, I take the performance criteria and adapt the performance criteria to a more active, observational thing where possible. … I do a certain amount of modification for different customers, so that the references to the equipment or circumstances of that particular person is going to be in, not a general term that can be applied across a number of companies. … I develop questions which are designed for verbal purposes rather than written purposes where possible. So basically everything now is produced in-house, starting with the Package’. (Peter)

Other practitioners similarly use workplace vernacular in their participant materials but rather than necessarily creating plain English versions of units of competency they structure learning and assessment around the work function. This approach is illustrated in the following interview extract in which Jessica explains that her participants achieve national qualifications by undertaking structured workplace activities.

‘Instead of doing it by unit, what we want is a big assignment that the organisation will benefit from. So instead of doing it piecemeal, you enter, and you work through the units of competence that are a bit more integrated, and you have an integrated assignment. … Because you actually don’t want to give somebody the Training Package and say “Demonstrate this”. I mean, how do
you do that? Like, even though the evidence guide is there, it’s very non-specific. The layout, the format, everything is … if you don’t know what you’re looking for … We don’t show [participants] the Training Package, because I don’t think it would be helpful’. (Jessica)

Jessica’s workplace project addresses several Frontline Management units of competency and is based on a project specification document that makes no reference to the units, the Training Package, or even to Frontline Management qualifications; it is entirely structured around local workplace expectations. All aspects of this program, from enrolment processes to assessment tasks, use the work function rather than the Training Package as the primary reference point. Other informants described similar approaches.

‘Let’s say for example, “Ability to record a claim”. Well we actually break that down even further and say “Explain what paperwork has to be completed in order to register a claim. Demonstrate on the computer how you would register a claim. Where does this paperwork go?” So we actually break that element down into steps for our people. And we haven’t done that as a consequence of seeing the element and then breaking it down. We’ve looked at the processes that we follow as an organisation and we simply list that, which fits in with the competency standards anyway’. (Julia)

Exploring these approaches reveals that some RTOs interpret national VET texts such as Training Packages and the AQTF broadly, allowing them to develop learning and assessment programs to suit local needs.

‘I reckon it’s great. To me, the whole intent of the AQTF is not to hamstring training organisations into a particular delivery thing, and it really goes back to Training Packages. … As you know, the Training Packages are basically a set of standards, a set of guidelines, and a qualifications framework. There’s nothing about the teaching and learning materials. And the only thing they’re asking at the end of the day in the assessment stuff is that the assessment is done meeting the performance criteria from the standards. … I think it’s just a lack of understanding or trust or whatever it is between the RTOs that are up the wrong – to me – the wrong end of town with their understanding of AQTF. The wrong end is saying that they’re hamstrung by the Training Package, they have to have this and they have to have that. I think that’s very much the wrong end of town, … It just bugs me that they just get stuck in their own little thing and say … “Yes they’re throwing strings and tying us up in knots so we can’t do our job”. But it’s not. To me, it’s not, they’re looking at it totally wrong. To me this leaves a great amount of room for being innovative and creative. … because there are so many ways you can deliver. … and it just leaves it open – to me, anyway – to be as creative and flexible as you like. From total classroom to total workplace, and anywhere in between’. (Barry)

Official VET accounts that construct learning and assessment as a supportive process that is highly responsive to local needs are idealised, but they are not fiction. Several informants described approaches to practice based on a broad reading of VET texts in which the social relations enacted allow room to respond to local contexts and issues. These informants talked about having freedom to design local learning and assessment
programs to meet the needs of their participants and contexts providing they stay within broad guidelines that guarantee national recognition of the qualifications they issue. Such broad readings allow practitioners a level of freedom to exercise their professional judgement in decisions about learning and assessment, enabling them to create spaces for meaningful learning at the local level. In these approaches Training Package units and the AQTF standards remain in the background as source documents rather than in the foreground as a primary reference point around which programs are structured. While the interview data reveals that approaches such as these are possible, it is clear that they are by no means universal.

‘Well, they have to have it in there somewhere’

In contrast to the approach described above, some practitioners understand that the AQTF establishes a formal requirement that all participants be given uncontextualised units of competency. While acknowledging that learning and assessment materials will generally be written in accessible language, they understand that there is a minimum requirement that the materials will include units of competency drawn directly from the Training Package without any modification. These informants described standard practices which place Training Packages very much in the foreground, with participants being directly confronted with units of competency often incorporated into large and complex documents designed to establish compliance with all the information requirements set out in the AQTF.

Practitioners who use units of competency as participant texts have been criticised for ‘modelling bad practice’ (Jennings 2004, p.15). While the practice is questionable, responsibility for its adoption does not necessarily lie with individual practitioners. Most practitioners in this study did not talk about choosing to give participants units of competency; they typically described themselves as being constrained or compelled in some way to adopt a practice which they themselves regard as highly inappropriate. The rationale behind this practice varied but the most common explanation in the interview data was the perception that giving units of competency is an AQTF requirement. This perception is evident in the following brief comment by Fiona, but her doubts about the appropriateness of the practice are also clear.
‘And when I usually go and teach a new unit of competency, with AQTF I have to let them have their performance criteria, so I give it to them … Because we are supposed to let them know up front what’s expected of them. It’s a two-edged sword, we’re really playing games with them’. (Fiona)

Practitioners in this study spoke at length, and with some feeling, about the negative impact they see the provision of these texts having on participants and the professional disquiet that they themselves experience as a consequence. Many expressed both frustration and exhaustion (Ng 1988, p.13) in describing the strategies they use as they struggle to resolve the tensions and contradictions inherent between what they understand to be good educational practice and what is required of them under a national quality framework. In the following exhibit Louise expresses a powerful sense of disjuncture together with an awareness of power relations that see decisions about her professional practice being subject to judgement from positions of authority beyond her local site.

‘I wouldn’t expose them to this sort of stuff. … I would not expose them to this. So all the instructions from the auditors, to make sure you map it to all of these things and all the rest of it. I’m basically making a bit of a stand about it. But to cover myself what I’m doing, I’m doing nice little unit outlines that cover everything, and then I’m saying “If you’d like to know more about the criteria on which you are being assessed, please see the back of this booklet”. And then I have this chucked in the back, so they can read it if they want, but otherwise they don’t have to. Because it’s very upsetting. … Well, they have to have it in there somewhere. But what I do is I use plain English, and I put it in a user-friendly format, and I say “If you want to see what you’re being assessed against, you can have a look at the back of the booklet, and it’s all there”’. (Louise)

In contrast to the level of freedom provided by broad readings of the AQTF the approaches described by practitioners such as Louise and Fiona reveal a narrow and rule bound reading of national texts. In the following extract Graham argues that some RTOs were so apprehensive about addressing the AQTF standards that they responded with approaches that stifled initiative.

‘… they suddenly found restrictions placed upon them, and were in panic to get all of that there. And some of the early trial audits and the like found them wanting, so they were petrified that they would lose their status, so they’ve gone overboard on this conformity. … And none of them have got that faith in their people. And they have invariably as well placed the need to be compliant in the hands of an internal auditing group which again is stifling initiative’. (Graham)

Practitioners working within such approaches described a compliance driven environment in which their ability to meet the needs of participants is constrained by
standardised learning and assessment practices imposed in response to Training Packages and the AQTF.

**Different readings of ruling texts**

The different approaches to AQTF compliance described in the interview data point to the different readings achieved by readers who engage with and enact ruling texts in different locations (Kinsman 1997, p.222). Everyday learning and assessment practices enacted at local workplace level are shaped by institutional processes that have their origins in the social relations of the national VET system. Official regulatory texts such as Training Packages and the AQTF are neither passive nor neutral; they actively organise and coordinate local activities (Kinsman 1997, p.216). Organisational knowledge is textually mediated; work is coordinated, organised, and made accountable through text based practices, and the way these texts are enacted at the local level is part of the meaning that they carry (Campbell 1998, p.58; 2003, p.3).

Narrow and rule bound readings of the AQTF position VET practitioners as functionaries in the educational process and shift the authority for decisions about learning and assessment from those with educational expertise to those with power in audit and compliance. But narrow readings are not the only way the AQTF can be activated. The interview data confirms that other RTOs have achieved AQTF compliance through much broader readings of national texts. This indicates that the oppressive readings achieved by some RTOs are not the only ones possible, nor is the particular form of ruling achieved through these readings necessarily imposed by ‘powerful others’ or through coercion (Campbell, 2003, p.7; Kinsman 1997; Ng 1988). There is something else happening here.

Individual organisations take up and activate ruling concepts in the local activities and procedures that they adopt as they engage with and implement ruling texts (Campbell 2003). Social regulation within VET is being actively accomplished by individual RTOs operating across the wide diversity of VET contexts learning ‘new ways of “doing business”’ (McCoy 1998, p.395). The new ways they are learning have significant
implications for the authority of VET practitioners and their freedom to use professional judgement.

**An authorised text that stands in for and organises learning and assessment practice**

The previous chapter argued that Training Package units of competency stand in for local workplace practice (Jackson 1995, p.169). Similarly, the AQTF standards are complex, abstract and decontextualised accounts that ‘stand in for’ local learning and assessment practice. The AQTF coordinates the actions of RTOs and practitioners through a regulatory requirement that all RTOs produce documentation that demonstrates their full compliance against all standards (KPA Consulting 2004, p.7). This text ‘plays an active conceptual role in setting the terms in which organizational activities can be thought, discussed and evaluated’ (McCoy 1998, p.396).

The explicit objective stated within the AQTF is ‘to provide the basis for a nationally consistent, high quality vocational education and training system’ (ANTA 2005f, p.1). This objective suggests a link between the AQTF and quality principles. When national AQTF implementation was reviewed in 2004, the report from that national review introduced a level of ambiguity about the intent of the standards (KPA Consulting 2004). The report stated that the AQTF standards ‘were never intended to be, or articulated as being, referenced to or derived from quality management principles’, and it argued that ‘the AQTF is being asked to bear a ‘quality load’ it is not conceptually equipped to support’ (KPA Consulting 2004, p.27 & p.29). The report further stated that the AQTF was designed to increase ‘regulatory rigour’ by specifying higher requirements for RTOs, improving auditing, and introducing standards for state and territory training authorities (KPA Consulting 2004, pp.13-14). Elsewhere the report argued that the ‘specific and limited’ purpose of the AQTF was to secure national consistency and protect the integrity of VET qualifications (KPA Consulting 2004, pp.26-27). Whatever the official relationship between the AQTF and quality management principles, the AQTF is a key text in the VET regulatory framework and remains the major focus of government efforts to ensure national consistency.
For an RTO, undergoing an AQTF audit is a process of being constructed as ‘compliant’ or ‘non compliant’. As with Training Packages, the emphasis on recognising local practice is not on how the practice is enacted but on how it is documented.

‘The only thing we had to do was basically document a lot of things that we’d never documented before. They were all up here, in our brains, but we’d never documented. … The first thing was documenting our processes, OK? As a training department. So, for example, if we want to develop new notes what’s the process we have to follow? If we want to recruit a new person to our training department, what’s the process to follow? … So that’s what we had to document. It was all in our heads, we knew how to do it, we just had to have it written down somewhere’.  
(Julia)

The AQTF, like other quality management systems, requires organisations to introduce a high level of documentation across all areas of operation and work processes (Farrell 2000, p.24; Jackson 2000, p.6). RTOs are required to develop and document procedures and systems to govern a wide range of local activities including: financial management; client service; administration and records management; recruitment and development of staff; training, learning, and assessment; issuing qualifications; and marketing (ANTA 2005f). This focus on documentation rather than practice emerged in both levels of data from this study. In the following extract from the interview data Taryn explains that when an RTO is found non compliant and is asked to provide additional evidence the focus shifts from the practice to the ‘bits of paper’.

‘… what we’ve actually done is created a situation where compliance equals bits of paper. Because you have to send us more bits of paper to try and get through. So we’re changing that completely in terms of the way we manage our audits. Because I want them to focus on what they need to do to become compliant, not on what bits of paper are going to get [the auditor] off their back. So we’re changing it to say “Well if you’ve got non-compliances, what’s the cause, and how are you going to fix them? And then is that appropriate action?” rather than saying “Is this bit of paper the one that’s going to get [the auditor] off my back?” So in terms of that criticism of AQTF and the compliance issue, I think it’s valid. And we’re trying to say “No, put the focus back on your own practices and why you’re non-compliant in the first place. What do you need to do to fix it? You may end up with another piece of paper. You may end up with revising a process, because it’s not working properly. You may end up with changing the way you communicate within your organisation. I don’t know what you’re going to end up with, but you have to identify why this has gone wrong and then fix it”. Rather than say “What bit of paper’s going to get [the auditor] off my back?” … There has been a compliance focus. And I don’t think that [the AQTF] has created it necessarily. Yes there is a compliance issue at the end of the day, but it’s the way we’ve implemented it, that I think has reinforced that, and for people who don’t understand what’s in it properly, it’s just giving the wrong messages about what’s required to meet it’. (Taryn)

In the above exhibit Taryn recognises the focus on achieving compliance through ‘bits of paper’ but she does not accept this as appropriate and she describes strategies being
adopted to encourage RTOs to focus on actually improving their practices. This is one response to evidence that the AQTF has encouraged a focus on documentary compliance rather than good practice.

The national review of the AQTF similarly acknowledged criticism that the AQTF has imposed a ‘compliance driven’ framework, focusing on documenting process rather than encouraging continuous improvement and valuing consistency over innovation (KPA Consulting 2004, pp.25-28). It also reported industry concern that auditors were preoccupied with ‘paper’ and put insufficient weight on examining the quality of delivery and assessment (KPA Consulting 2004, p.35). The national response to these criticisms is rather different to the response described by Taryn. The review report largely dismissed the criticisms, stating that ‘presumably regard for compliance is a good thing if its object is to determine whether the standards have been met’ (KPA Consulting 2004, p.27). This superficial response neither acknowledges nor engages with practitioner concerns that generating the ‘bits of paper’ needed for AQTF compliance is in some cases being achieved at the cost of quality learning and assessment as local practice is reorganised to align to the AQTF standards.

‘Bits of paper’ that reshape local practice

The formal requirement for a high level of documentation raises questions about whether documenting practice has an impact on the nature of the practice itself. The interview data reveals different perceptions about whether the AQTF standards organise and shape local practice. The following exhibits from Kate and Mark reflect the view expressed by several informants that the AQTF simply requires RTOs to document processes that they are already following.

‘I feel very confident that I will have addressed all of my performance criteria at the end of each session. … But I also document for AQTF how I’ve encompassed that and I just go ahead and map which part was which performance criteria. It’s not really that much work, maybe I’m used to it I don’t know. I’m also really good at documenting, I’m a real believer in documentation. But since the AQTF has come in there is no doubt there is more documentation than ever’. (Kate)

‘The biggest problem that I’ve found in the last couple of years with the implementation process, having been through a couple of audits, is not that we’re not doing it, it’s just that we need to have some sort of documentary evidence’. (Mark)
In the following extract Taryn challenges the suggestion that documenting local practice against the AQTF does not change the practice, arguing that it changes the way RTOs manage their processes.

‘Yeah, but they have changed what they’re doing, because they’re now giving students statements about appeal rights, which perhaps they weren’t doing before. If they’re documenting stuff better, are they setting themselves up to better moderate? They are changing the way they do things. They’re changing the way they manage it. Which is what this is. It’s a quality management system. It’s about making sure you do the right thing every time and consistently, and come out with the same outcomes. And so I think while people say “I haven’t changed what I do”, fundamentally they’re doing the same stuff, but they’re managing it better and I think they’re probably communicating it better to their students, hopefully. Communicating it better to themselves and their staff, and perhaps getting more overt consistency if they’ve actually got stuff to moderate’. (Taryn)

Renee similarly recognises that documentation changes practice, but rather than seeing complex assessment documentation as improved management she describes it as a ‘paper wedge’ between the practitioner conducting an assessment and the participant being assessed.

‘I can see why they do it, that this is clear evidence that the RTO is following the processes and that they are complying, but in reality, what’s it got to do with the face-to-face process of assessment? I don’t think it works at all. It’s too complicated, it’s too hard to understand, and it doesn’t tell anybody anything except the auditor … the actual evaluation, the consideration, the interaction between assessor and the person being assessed, you have this paper wedge which has gone in between. Have you met this bit, have you met that bit? Is it being done holistically? What about the key competencies, are they being included? How are we going to show that we actually checked those?’ (Renee)

The above accounts illustrate that when informants talked in abstract terms about the AQTF a wide range of views emerged. But when informants talked about specific examples the interview data suggests that documenting local practice to demonstrate compliance can actually diminish the quality of learning and assessment as participants experience it.

Consistent with this study’s focus on language the area of practice most frequently discussed by informants was the adoption by many RTOs of complex institutional texts to replace verbal explanations of information about matters such as program content, assessment standards and appeal rights. Far from representing better communication, several practitioners argued that participants find these institutional texts more difficult to understand than verbal explanations expressed in familiar language. The dilemma is
that a verbal explanation does not generate documentary evidence for audit. Replacing verbal explanations with a complex organisational text provides this documentary evidence, and some RTOs generate further evidence by requiring participants to sign for receipt of the written information. At audit the organisational texts make the provision of information to participants visible but informants questioned whether this documentary evidence really demonstrates that a meaningful explanation has been provided.

‘And in fact the process doesn’t even demonstrate that it’s been done necessarily. You might have a signature on a form, but it doesn’t necessarily mean that the appeals process has been explained to the person. They’ve been given a piece of paper and they’ve signed for the piece of paper. … you may give them something to read, but you’ve still got to explain it to them. To me it would be sufficient here if our assessment procedure said that a verbal briefing will be given to every candidate which will include … that’s more than adequate. But to be expected to give someone something to sign – you know, some of our guys have trouble even signing their name’. (Peter)

The procedure introduced by Peter’s RTO changed the way in which his practice was enacted. If the procedure simply documented local practice it would state that certain information would be verbally explained to participants. Replacing the verbal explanations with written texts provides evidence for audit and establishes the AQTF standard, rather than the needs of local participants, as the reference point around which the practice is discursively redesigned (Farrell 2001, p.201).

VET practitioners engage in a range of work processes aligned to the regulatory requirements of the AQTF: developing learning and assessment plans, documenting assessments, and participating in validation activities. These work processes require practitioners to describe their practice using organisational literacy, where ‘what counts is how matters can be written up (to enter them into an organizational process), not how they can be written down (to relate experience or to aid memory)’ (Darville 1995, p.254 [emphasis original]). Such processes are not simply technical tasks; practitioners become ‘agents’ of the dominant practices of VET as they “write up” their practice into organizationally programmed accounts, [and] begin to think about their work in the terms they are given’ (Campbell & Gregor 2002, p.20).

People who are required to report on their everyday activities develop work strategies and find ways of acting which will provide evidence that can be aligned to those reporting requirements (Smith, D.E. 1990a, pp.93-100). In VET this is clearly seen in
the development of learning and assessment documentation. In the exhibit presented above Taryn described RTOs documenting their assessments and ‘setting themselves up to better moderate’. This documentation sees practitioners produce texts that make their assessment judgements visible in ways that enable them to be compared to judgements made by other assessors in different contexts. This documents aspects of local practice in terms that are meaningful within the VET regulatory framework and connects local practice directly to national VET agendas of standardisation and consistency (McCoy 1998, p.407).

Practitioners in this study typically criticised the formality and complexity of these texts. They argued that providing the text does not remove the need for the verbal explanation. Indeed, informants described spending considerably more time working through these complex texts than would be required if they were free to present the information in a way that was meaningful to their participants.

‘… the AQTF perhaps unnecessarily complicates it. Well here’s the instrument that we’re gonna base ours on, and it’s just got all this information in here … that we have to give the candidate regarding the assessment plan, the elements and the method of assessments, the RPL Skills Recognition process, a review and appeals process – all this sort of stuff. … But, I mean, is it necessary for them to know all that stuff? Assessment methods, fine. I mean, we’ve always explained that to people: “This is what I’m gonna look at, this is what I want to see from you, this is how we’re going about collecting the evidence from you”. I mean it goes without saying that you have to make that clear. But there’s clear and there’s these documents. … I could tell somebody all of this information within the first 10 minutes of the assessment, but it would take me an hour to walk them through that [document] and have them understand it. … there are better ways of putting it to them so that they understand. It doesn’t necessarily all have to be there in black and white. … It starts to become confusing to people. This is a simple assessment – I’m seeing if you can clean and sharpen your saw, and there’s 15 pages of information he’s not gonna even understand to start with. … He’ll say “What am I supposed to do with this?” and I’ll say “Well we’re supposed to give this to you by law” but it’s not something that they’re really that interested in, really. … usually they just have a quick look at them and go “Oh yeah” and give them back. They’re not really interested. … I mean, what more are we supposed to do? We’re not gonna test that they’ve read it’. (Colin)

In the examples provided by Peter and Colin AQTF requirements reshaped organisational accountability and an appropriate local practice was replaced by an inappropriate practice. Practitioners are caught up in a new set of relations in which their local practice is restructured through their accountability to external texts (McCoy 1998). As a result they have to allocate time to explaining the texts and encouraging participants who feel confused, overwhelmed and intimidated.
Organising learning and assessment practice through national quality texts

Quality compliance, hidden work, and institutional mavericks

By identifying the RTO and not practitioners as the entity responsible for achieving compliance (ANTA 2005f) the AQTF standards render practitioners largely invisible within a text that focuses on the work processes rather than the people who enact those processes (Farrell 2000, p.27). Yet it is through the work of practitioners that RTOs achieve and maintain compliance. Quality approaches introduce organisational systems which have direct impact on individual practice by codifying and standardising knowledge and controlling work practices and working relations among people (Farrell 2001, p.207). The people whose knowledge, work practices and working relations are subject to codification and control through the AQTF are VET practitioners. In the following fragment of data Louise illustrates how a responsibility that formally rests at organisational level in practice translates directly into the responsibility of individual VET practitioners.

‘… you’re too scared to put something on a unit outline, in case you’re doing the wrong thing – you know – and that your college is going to be found non-compliant because of you!’ (Louise)

VET practitioners undertake the considerable work involved in fulfilling the AQTF requirement that the RTO develop and document learning and assessment strategies. These learning and assessment strategies are typically documented for each unit of competency and include delivery and assessment timetables, session plans, participant materials, assessment instructions and checklists. Their development requires practitioners to conduct and document industry consultations, assessment validation, and action taken to improve the quality and consistency of assessments. All this documentation is reviewed each time a program is customised to meet the needs of a different group of participants.

‘I think time is a big thing that hangs people up. The time involved in putting everything together, and the amount of duplication that goes on in terms of paper and documentation. There’s a huge amount of that goes on. … in the area that I was in where it was 100% customisation, every time we came to a new unit or a new workplace it would be completely revamped every time. So that’s fair enough, but with that then goes assessment tools, documents… we were constantly reinventing the wheel, and you had all your documentation and your stuff to go with it’. (Fiona)

This work represents just part of the unacknowledged effort required of VET practitioners in satisfying a single AQTF standard. In undertaking this work practitioners
generate texts that represent their learning and assessment practice in terms of the relevances and categories provided in the AQTF (McCoy 1998, p.397). At audit this documentation is examined to establish whether local learning and assessment practice complies with national requirements. This establishes a ‘textual mode of governance’, in which VET practitioners are ‘organized and mobilised as self-disciplining practitioners of the very mechanisms of ‘control’ used against them’ (Jackson 2000, p.3). By writing up their learning and assessment practice VET practitioners create workplace texts that enter them into managerial processes in which they are ‘subject to’ but not ‘subjects of’ texts (Jackson 2000, p.3). Practitioners have little choice but to participate in AQTF audit processes, and the tangible outcomes are potentially quite significant. The range of possible sanctions for non compliance include the RTO having its registration amended, suspended, cancelled or subject to conditions (ANTA 2005i, p.21). While such sanctions are formally imposed on the RTO their potential impact on practitioners includes the possible loss of employment.

The interview data from this study reveals that practitioners comply with the textual requirements of the regulatory framework but they still use professional judgement in their direct dealings with participants. Informants spoke at length about the extra work they undertake to overcome the negative impact of organisational practices. This work is not recognised within VET: some informants described undertaking this work in their own time as extra unpaid hours, others described it as being in breach of formal organisational procedures. Marie Campbell and Frances Gregor (2002, p.20) described such hidden work as ‘intelligent, on-the-spot interventions, [which] often rescue from failure the operation of text-based strategies’.

One study explicitly identified the need for VET practitioners who are working in partnership with Aboriginal communities to work within the administrative rules of VET without insisting on applying those rules too rigidly (Djama and VET 1998, pp.32-36). This study introduced the concept of an ‘institutional maverick’ to describe a practitioner who is able to ‘sustain responsive, inclusive training delivery’ and to also sustain the partnerships between practitioner and participants that are necessary to support that delivery (Djama and VET 1998, p.34). In the current VET regulatory and
Organising learning and assessment practice through national quality texts

policy framework the institutional maverick is a useful concept that can be extended to all VET practice. A number of informants in my study talked about working within, and working around, restrictive rules and procedures without being constrained by them.

Many RTOs rely on practitioners to use their professional knowledge and skills in intervening to repair dysfunctional aspects of standardised text based practices. Individual practitioners have little option but to undertake this hidden work but in doing so they are unwittingly acting as agents of the national VET system and are unaware that they are ‘participating in a social relation of dominance and subordination’ (Campbell & Gregor 2002, p.22). Local practices such as translating units of competency into accessible language or providing additional support and encouragement to participants who are at risk of being discouraged create an appearance that the regulatory framework of VET is operating smoothly and efficiently. This work is not only invisible as VET practice it is also invisible as ruling practice (Campbell & Gregor 2002, p.22).

Concerns expressed by informants in this study reveal that, while practitioners have responsibility for adhering to compliant practices this does not necessarily mean that they have authority for determining what form those practices will take. The abstract language of the AQTF raises questions about who has power to determine what readings will be accepted as authoritative.

Who has power to determine authoritative readings?

The AQTF standards use abstract language that needs to be interpreted, and which is not necessarily understood by the practitioners and RTOs whose local practice is subject to formal judgement. The AQTF review acknowledged that there is often a ‘mismatch’ between the evidence required by auditors and that prepared by RTOs in preparation for audit (KPA Consulting 2004, p.36). This issue also emerged in the interview data from my study.

‘I’ve gone on training courses to find out what the standards mean. And sometimes the people who taught me, I’ve been talking to another assessor and they’ve said “Oh no, it’s interpreted this way”. So in other words, because of the way the language is structured, and because of the vagueness of it, the interpretation is a really major problem. … You’re never quite sure if you’re right. You go into an audit and you think, you’ve got your evidence piled up to the ceiling. And
they didn’t need 90% of it, so you’ve spent hours compiling evidence that they didn’t need. But they needed all this other stuff that you didn’t prepare. So that while they’re there you’re rushing around like a mad thing trying to get all the evidence that isn’t there because it wasn’t clear that that was actually what was needed’. (Jessica)

VET practitioners often do not understand the abstract AQTF standards, and they seek out authorised readings to inform decisions about their own practice. Interpreting the AQTF standards is a process of determining what will count as local knowledge as it is activated in specific learning and assessment practices. This process potentially offers opportunity for practitioners to ‘work’ the discourses, interpreting the AQTF standards in ways that support locally appropriate activities (Farrell 2000, p.23; 2003, p.12).

‘… the AQTF is a document that still allows interpretation. Now if you take a narrow interpretation of it, it can become limiting. If you expand on those limitations by having a good knowledge of the concepts and the principles, you can then explain or articulate what it is that you are doing. And without knowing the specifics, I think what that might indicate is the lack of knowledge or ability to take one concept and to attach it within a framework, so what they do is they look at it and they go “No, this framework doesn’t work, so therefore it doesn’t work”. Rather than look at it and go “Well OK, the framework, if it’s read literally says this, but in fact if its interpreted can mean all of this, plus this, plus this, plus this, and I can actually build those bridges”’. (Paul)

Paul’s comments point to the need for VET practitioners to have a knowledge of VET language and texts, and authority to develop their own interpretations of the abstract standards, if they are to ‘work’ the discourses of the AQTF. But the AQTF was introduced into a VET sector where Training Packages were already accepted as national texts that organise local workplace practice, and the power of practitioners (rather than participants) to determine authoritative readings was established.

As with Training Packages the AQTF conveys a sense that the standards have intended meanings, or that some interpretations will have authority while others will not. There appears to be wide acceptance that with the AQTF it is the auditor, and not the practitioner or RTO, who has power to determine authoritative readings of the standards. The AQTF auditor’s formal power is derived from their position in the audit process and is textually defined in the AQTF standards that regulate state and territory training authorities (ANTA 2005i). Even the national AQTF review noted that ‘[t]he ultimate outcome is compliance, but for some RTOs and auditors this is thought generally to mean compliance with the auditor’s opinion of what needs to be in place’ (KPA Consulting 2004, p.36 ). The perception that auditors are in a position to know what is
required is further evidenced in the AQTF review report. In contrasting the critical views expressed by RTOs and the favourable views expressed by auditors the report suggested that the discrepancy ‘perhaps reflects the auditors’ greater experience over time and the development of their own personal theories as to the intent and meaning of specific standards’ (KPA Consulting 2004, p.36).

The provisions of the VET regulatory framework give AQTF auditors formal authority to establish their interpretation of AQTF standards as authoritative. The interview data suggests that widely adopted practices surrounding AQTF implementation provide further, less formal, opportunities for auditors to establish their own ‘personal theories’ about how to interpret the standards. AQTF auditors typically operate in a range of roles within the VET sector (KPA Consulting 2004, pp.43-44). The additional roles performed by some auditors include providing consultancy services and professional development workshops to advise RTOs and practitioners preparing for AQTF audit. Even without any coercive or manipulative intent, such roles potentially reinforce the power of auditors by providing opportunities to establish the authority of their own interpretations at the point where RTOs first encounter the AQTF in developing their learning and assessment systems and practices. As an authorised text the AQTF operates by influencing social interactions that shape decision making and local practice. If practitioners approach the AQTF standards using their local site as the primary reference point they may arrive at a very different interpretation than the one they arrive at if their local readings are informed by prior guidance received from auditors. The potential for auditors to influence the development of RTO procedures and systems is illustrated in the following exhibits in which Louise describes how preparation for AQTF audit within her RTO saw ‘ex-auditors’ given authority over the professional judgement of learning and assessment practitioners.

‘… basically everybody went totally nutty last year trying to prepare for this audit. And they had people, ex-auditors, coming in and doing professional development sessions with us, evaluating our materials, telling us what was what. These auditors were saying things like “You must have everything mapped to every single performance criteria on all things you give to the students. On every assessment, you have to show how it maps to each. You’re not allowed to assess anything apart from either a whole unit of competency or a whole element”. … There was all these no-no’s. You are not allowed to assess underpinning knowledge and skills. That would be invalid. You are only to assess competency. … But in our area, those knowledge and skills areas are huge. They’re a huge part of the content. But we got told that by three ex-auditors that came in and'}
Organising learning and assessment practice through national quality texts

worked with our college, every single one of them. So we were told by our management “Do what they say”. We were running around like chooks without heads, changing all our unit outlines and assessment tools … But since then we have looked, some of us. And we have found ANTA documents that spell out examples that demonstrate that you really should assess underpinning or essential knowledge and skills, and if the person doesn’t pass that part of it then they can’t be deemed competent, because they don’t even know the reason why they’re doing things. … So we’ve actually pulled those out and we’re keeping them handy, and we’re just going to do what we think you need to do, and if the auditors come along and say “Uh-uh. That’s a no-no” we’re just gonna say “Well, ANTA doesn’t say so”. … So when you talk about is my autonomy being interfered with? In a huge way. Absolutely huge’. (Louise)

At another point in the interview Louise explains that the centralised RTO procedures imposed through this process even dictate what she is allowed to include in her participant materials.

‘We’ve got little clipart in it, and little things. Commonly asked questions, and that kind of thing. Just in a very simple way saying “Your access to skills recognition. This is what the subject is about, this is what we’re trying to do”. … And then we had the program set out with week-by-week what we were doing, and then we had a whole lot of activities for them to guide their learning. … And at the front it’s got a quote from Lao Tzu, as well. So that is much nicer, and we’ve been told things like we can’t do that – we’re not allowed to. Like, we have been so restricted, and all of our course outlines have had to be boring. They’ve told us that we have to follow this template – the college management are trying to enforce this template, but so far we’re resisting – you know. But they’re trying to enforce this template that has got a place for all your performance criteria rah rah rah, a place to put about special needs, a place to put about skills rec. But it doesn’t allow any individuality, it doesn’t allow creativity. And they’re saying that all of our materials and everything, and our unit outlines and that, have to be uniform. Like, we’re not allowed to have our own approach and make our own stuff. Whereas, my contention is that as long as we get guidelines as to the minimum requirements of the AQTF, it should be up to us, our individual people, the way they design their stuff. I think that makes it more interesting for students, makes it more interesting for us. Instead they’re giving us stuff that’s got the college bloody logo on it, it’s got the same – no sort of interesting anything. It’s just boring, horrible stuff’. (Louise)

These exhibits clearly express concern about an approach that sees authority for developing learning and assessment systems and processes being allocated to people with expertise in auditing rather than in learning and assessment. They stand in contrast to the Australian National Training Authority perspective that a ‘fundamental pillar’ of the National Training Framework was to regulate outcomes but deregulate delivery, ‘exalting’ the professionalism of VET practitioners and providing ‘an opportunity they’ve never had before’ (Bluer 2000, p.5).

Of particular note in the above exhibits is the response of Louise and her colleagues to the instruction that they are not allowed to assess knowledge that they deem essential. While they draw on their professional judgement and knowledge of local needs to
recognise this advice as inappropriate they do not believe that this will be sufficient to defend the appropriate local practices they have chosen to adopt. They prepare to defend their position by seeking out and ‘keeping handy’ official VET texts that support their interpretation. The only basis on which these professionals feel they can challenge practices that have been imposed through the authority of one external VET text is by referring to the authority of another external VET text. For Louise and her colleagues documenting their practice is a process of ‘self-alienation’ which strips away their professional authority and positions them as accountable to levels of decision making from which they are excluded (Jackson 2000, pp.12-14).

**A shift in policing occurring on two levels**

The formal power of auditors to make judgements about local learning and assessment practice is enshrined in regulatory texts and represents a significant shift in policing from local sites to external authorities (Farrell 2001). But this formal shift from the local site to external authority is not the only level on which policing of local learning and assessment has changed. The interview data from this study suggests that in many RTOs there has been a parallel shifting of authority within the local site, away from practitioners engaged in learning and assessment practice towards organisational managers and internal auditors who are some levels removed from that practice.

The AQTF places authority for deciding how compliance will be achieved with organisational management rather than practitioners. The AQTF requires RTOs to designate staff members who have responsibility for ensuring AQTF compliance, and to conduct an internal AQTF audit ‘at least annually’ (ANTA 2005f, p.3). This establishes the basis for one or more staff members within the RTO to hold local authority that mirrors the external authority held by AQTF auditors. The requirement that these designated staff members have ‘direct access to the RTO’s chief executive’ (ANTA 2005f, p.3), makes it likely that in large RTOs responsibility for AQTF compliance will rest with managers or administrators rather than with practitioners engaged in front line learning and assessment.
While the AQTF requires RTOs to ‘ensure that policies and procedures are circulated, understood and implemented consistently throughout the RTO’ (ANTA 2005f, p.3) there is no requirement that learning and assessment practitioners be involved in any way in developing those policies and procedures. Some RTOs place authority for compliance in the hands of administrators and internal auditors rather than in the hands of the learning and assessment practitioners whose unacknowledged work is essential to achieving and maintaining that compliance. In this approach the regulatory and compliance focus of the AQTF can take precedence, giving rise to narrow readings that are inconsistent with good learning and assessment practice.

While the dual nature of the shift in authority is evident in the fieldwork for this study there is some indication that it is not necessarily visible to practitioners in local sites. The formal shift in policing from the local site to external auditors is highly visible to practitioners, particularly when practice that is judged compliant by one auditor is subsequently judged non compliant by another.

‘I was audited four times in my last job, and every single audit brought totally different things up – there was no consistency in the application of the standards! One piece of documentation I had, one auditor thought “That was fantastic! That’s great, that’s best practice”, another auditor’d come in and go “That’s not right, and I don’t like this”. I go “Alright, fair enough”, you know. And I think that’s that whole ambiguity with that is “What the hell do you want from me? Just tell me and I’ll do it!” And I think that’s the frustration from practitioners. They say they’re not changing the goal posts, but they do, you know, all the time. It’s like guessing games a bit’.

(Fiona)

While Fiona clearly expresses her frustration about the successive imposition of different interpretations her statement “What the hell do you want from me? Just tell me and I’ll do it!” indicates her acceptance that power over decisions about her local practice rests with AQTF auditors and she has little choice but to comply. In contrast to the high visibility of this external shift in policing, the shift that is occurring within some RTOs is largely unrecognised. Some practitioners working within narrow and rule bound approaches to compliance appear to be unaware that specific local practices they are struggling with represent local decisions made within their RTO in response to an abstract framework in which other interpretations are possible. This is evident in consistent references to a perceived AQTF requirement that participants be given uncontextualised units of competency.
Organising learning and assessment practice through national quality texts

‘For AQTF they need to know up front what they’re being assessed on. So they need to know that in their assignment every single one of these [performance criteria] will be covered. … So at the beginning of workshops and throughout workshops they will get a copy of this [unit of competency], and this will be referred to. … My understanding is that for AQTF that we need to use the performance criteria and the elements that we’ve been given’. (Kate)

The shift from local practitioners to external auditors is highly visible. The external authority inherent in the AQTF audit process is far from anonymous and the specific interpretations being applied are regarded as neither ‘natural’ nor ‘best practice’ (Farrell 2001, p.211). In contrast, the shift that has occurred within some RTOs is much less visible. The interpretational role played by RTO management appears to be obscured and largely anonymous, suggesting that a partial shift in legitimacy has been achieved, or perhaps a ‘creeping colonization of minds and hearts’ (Campbell 1998, p.57).

This has implications for practitioners’ ability to influence the impact that AQTF implementation has on their professional authority and practice. The visible power of external AQTF auditors shifts policing of local practice to VET system level, but practitioners have historically had little influence over decisions made at this level. In contrast, the development of local systems and processes within their own RTO occurs at a level at which practitioners might have some scope for influencing decisions. But this is the level at which the shift in policing is obfuscated and less visible. For VET practitioners to resist locally imposed narrow and rule bound approaches and to begin reclaiming some of the professional authority that they have lost they need to recognise the role of local management in deciding how to interpret the AQTF standards.

**A unified national system?**

The National Training Reform Agenda brought trade training, technical education and workplace learning together in a single regulatory framework, and national consistency remains a key policy goal. Yet historical divisions remain within VET and these have significant implications for local resistance to imposed hegemony. The following discussion will introduce these issues and explore their implications.
Concerns about inconsistency in AQTF auditing arise frequently within VET, and were acknowledged ‘as the paramount or threshold issue’ for RTOs participating in the AQTF review (KPA Consulting 2004, p.41). But a single debate about inconsistency subsumes a number of subtly different issues that emerge in different situations.

One situation in which concern about inconsistency in auditing arises is when different interpretations are applied in each state and territory (KPA Consulting 2004, pp.41-42). This has potentially significant consequences for RTOs operating across borders, requiring them to design systems and practices that comply with apparently different standards in the different jurisdictions in which they operate.

‘So you get the AQTF auditors in WA have one view, auditors in NSW have another view, auditors in South Australia have another view – all because of this language that is being used in VET that is open to interpretation, and isn’t given guidelines on how to interpret it’. (Marissa)

A second situation which gives rise to concerns about inconsistencies is when a single RTO undergoes a succession of AQTF audits conducted by auditors operating with different personal theories about how the standards should be interpreted. Local learning and assessment practice is subject to repeated scrutiny against the AQTF. In addition to conducting an annual internal audit, RTOs undergo external audit at various times: before their initial registration is approved and again within their first year; when selected on the basis of ‘risk management’ (for example, a national audit of all RTOs within a particular industry); and when they renew or change their registration (KPA Consulting 2004, p.14). This succession of audits conducted by different auditors against the same abstract standards presents real potential for different interpretations to be imposed. The frustration expressed by practitioners was evident in comments made by Fiona and presented in a previous section of this chapter, and also in the following exhibit:

‘… that’s where the problem of the interpretation of it is. That quite a few people that I was talking to at the workshop yesterday said “In the first audit they picked up on something, so I changed it according to what they said. And then the next auditor will come in six months or year later and ask what I’ve done that for, and will say that it’s not right”. And maybe something has changed in that year to make it different. The wording hasn’t changed as far as I know, that’s all stayed the same, but it’s the interpretation that changes. And I don’t know if there’s any way of
A third situation in which inconsistency emerges as an issue is when the same practices or systems are judged compliant when adopted by one RTO but non compliant when adopted by another. This can give rise to the perception that the cost and workload involved in implementing the AQTF is not evenly experienced by all RTOs.

‘This is what I mean about the goalposts. One RTO can do it their way, why can’t another RTO? Is it the provider? How come compliance suddenly shifts – what is compliant in one area is not in another? One of the things the auditor said was “We don’t talk about marks any more”. … He said “We don’t talk about exams either”. And yet he had done a validation of an RTO only a couple of months earlier where he cheerfully accepted that they used marks, they used exams’. (Renee)

Each of these situations has subtly different implications for local learning and assessment practice within VET, but all are being subsumed into a single debate about inconsistency. It is difficult to argue that an RTO issuing national qualifications within a national regulatory system should be required to adopt different practices for each state and territory in which they operate. It is also difficult to defend a system which requires RTOs to change local procedures and practices that have been judged compliant, simply because the next auditor they deal with prefers an alternative interpretation of the standards. The third situation however, is different, and there are dangers in subsuming it with the first two.

The VET sector encompasses a wide diversity of content, contexts, participants, and RTOs. In response to this diversity the national strategy for VET encourages RTOs to be flexible and responsive (ANTA 2003.). Both Training Packages and the AQTF include provision for learning and assessment to be customised to meet local needs (ANTA 2005f, p.11; Leary 2003, p.10; WADoT 2002b, p.4). Within this diversity it is to be expected that RTOs will adopt different local practices appropriate to their own structure and to the particular learning and assessment needs they are addressing. Even something as simple as the size of the RTO can give rise to particular local practices.

‘And I think the small RTO has ways of doing things which maybe a big RTO doesn’t. A small RTO’s document tracking system doesn’t need to be quite as elaborate as a large one, because if only one person ever uses the document, it’s difficult to work out why you need to have a great
register of documents, when the person who’s the only one there has a pretty good knowledge of which one’s the current one’. (Graham)

This issue of diversity appears to be subject to contradictory forces operating at national and state level within VET. Some state and territory training authorities acknowledge the scope for diverse readings, encouraging RTOs to adopt innovative approaches to compliance (Bunic 2005; DET WA 2005a). There is, however, a danger that at national level the legitimate possibility of different readings in different local contexts will be overtaken by the wider debate about inconsistency.

The emerging response to perceived inconsistencies in AQTF audit is foreshadowed in an earlier extract from the interview with Marion, in which she raises the possibility of the AQTF being written ‘more prescriptively’ to reduce the need for interpretation. Such an approach is reflected in the emerging national government response to inconstancies. The AQTF review proposed a range of strategies including: nationally consistent professional development, networking, and ‘evidence guides’; a ‘national on-line facility for capturing interpretational precedents’; auditor moderation workshops; a centrally operated auditor registration scheme; and an auditor moderator to observe a sample of audits (KPA Consulting 2004, pp.8-9 & pp.44-45). The review also recommended the ‘development of a national compliance policy, including definitions and classifications of nonconformities, actions to be taken for each and triggers for suspension, withdrawal or cancellation’ (KPA Consulting 2004, p.49).

Within the rhetoric of a ‘fully integrated national VET system’ (Mitchell & Young 2001, p.5), the single debate about inconsistency makes no distinction between differences that arise through the authority of auditors to impose different interpretations and those that arise as RTOs and practitioners respond to diverse local needs. Subsuming all issues of inconsistency into a unitary concern that requires an official response draws practitioners into a debate in which consistency achieved through a national compliance policy and register of interpretational precedents may come to seem ‘transparently natural and right, just “best practice”’ (Farrell 2001, p.211). This has potential to advance the external shift in legitimacy which to date has not been achieved.
There is a real danger that centrally imposed national consistency will result in an increasingly narrow compliance structure, reducing the scope for practitioners to use their agency to respond to local needs. Without active and informed debate in which practitioners are positioned as professionals whose perspectives have value the freedom of RTOs and practitioners to ‘work’ the discourses and to use the national framework to create spaces for meaningful learning is at risk. But does this study offer any evidence to suggest that, with a wide range of possible readings available, a nationally consistent approach would tend towards the narrow and rule bound end of the continuum? The interview data includes some indicators that suggest this may be a legitimate concern. These indicators emerge in an exploration of a popular dichotomy that characterises different RTO types as adopting particular approaches to AQTF compliance.

‘TAFE’ vs ‘non-TAFE’ as a divisive discourse

A number of informants in this study suggested that an RTO’s approach to Training Packages and the AQTF was related to its size and organisational culture.

‘But this is the whole thing about the AQTF. That lots of people … are looking at the AQTF as a purely compliance issue that has been imposed on them, rather than looking at it as a framework for doing business in this industry. Which some non-RTOs are doing, and some RTOs are doing very well also. Usually the smaller ones, because they are seeing it as a competitive advantage in the marketplace’. (Cheryl).

Several informants argued that there are clear differences between approaches to AQTF implementation within TAFE colleges as compared to enterprise / private RTOs. To interpret the data in this way has a certain intuitive appeal. While Training Packages and the AQTF bring trade training, TAFE and workplace learning together under a single regulatory framework these different learning contexts have historically been quite separate and in many respects maintain their distinct identities. The result is that some popularly accepted dichotomies remain within the apparently unified VET sector. For example, some advocates of public education view TAFE colleges as providing a broad educational focus and an emphasis on quality learning, and they regard workplace learning as being associated with task focused behaviourist training and a concern about operational efficiency and profit margins. Some critics of the TAFE system characterise TAFE colleges as being associated with decontextualised classroom training that is out
of touch with individual needs and current industry trends, and they characterise workplace learning as responsive, relevant and useful.

There is some suggestion in the data from this study of an emerging dichotomy in relation to regulatory compliance, with TAFE colleges characterised as adopting narrow and bureaucratic approaches and enterprise/private RTOs characterised as being more flexible and responsive to local needs. In one sense the interview data could be interpreted this way. The strongest criticisms of the VET regulatory framework tended to be made by practitioners describing their experience in the TAFE system. In contrast, practitioners who worked within enterprise RTOs tended to talk about having a high level of freedom in responding to local needs and contexts. As intuitively appealing as this interpretation may be, however, the interview data does not necessarily support such a clear-cut dichotomy. To begin with, not all informants who had worked in the TAFE system regarded Training Packages and the AQTF as imposing constraints on their professional freedom.

‘I’m an apologist for the AQTF in the sense that I first looked at the standards in 2001. I read through the standards and said “Yeah, our college does all that”. (Mark)

Further to this, some informants described clear differences in the approach taken to implementation of Training Packages and the AQTF within the same TAFE college.

‘… it’s quite funny, within the same college, some areas of TAFE say they’re hamstrung by the Training Packages, some other departments – and I’ve got one wonderful group – are so innovative and flexible with the way they’ve applied the Training Package. They’ve done things with the Training Package it wasn’t even intended to, without compromising anything. … Yet you’ll get others that say “Nope! It’s not there, we can’t do it. …” They just get too literal around what’s there’. (Barry)

Similar internal differences were also identified within private RTOs, with one informant describing very different approaches to developing assessment documentation for use in industry training as compared to traineeships. In industry training:

‘I now develop my own [assessment tools] and the process is I take the Package, I take the performance criteria and adapt the performance criteria to a more active, observational thing where possible’. (Peter)

But:
These two quotes from Peter, while brief, are significant in that they introduce the possibility of an alternative explanation to the TAFE / non-TAFE dichotomy. Industry training conducted by a private RTO is typically funded either by the participant or by their employer; it would not normally attract public funding. Traineeships, however, do attract public funding and Peter was not the only informant who described traineeships requiring a particularly high level of documentary compliance. This data raises the possibility that the issues at stake may be subtler and more complex than a simple dichotomy between TAFE colleges adopting narrow and rule bound readings and other RTOs adopting open and responsive readings. There is some suggestion that programs which receive public funding, whether conducted by a TAFE college or a private RTO, are more likely to be situated towards the compliance focused end of the continuum subordinating and displacing the authority of education professionals.

Roxana Ng (1988) and Gary Kinsman (1997) reported studies that illustrate how conditions associated with the receipt and management of government funds have the effect of coordinating and regulating local activities. Both studies revealed that community based activist groups were depoliticised and transformed by the regulation accomplished through public funding arrangements, with the result that groups which previously contested government policy on behalf of the marginalised and disadvantaged began to function instead as part of government regulatory frameworks. It may be that public funding within VET is similarly associated with greater conformity with, rather than resistance to, national VET agendas.

Public funding arrangements enter RTOs into a ‘sub-contractual relationship with the state’ (Ng 1988, p.12). When this relationship is superimposed onto the levels of control already present in competency based Training Packages and the AQTF, local learning and assessment activities are penetrated by and connected to government economic and industrial agendas (Jackson 1995; Ng 1988). The power of funding bodies to impose compliance standards was acknowledged in the AQTF review report which stated that
‘the ‘cost-effectiveness’ perspective of the funder … is as important to a quality system as the ‘satisfaction’ perspective of an individual learner’ (KPA Consulting 2004, p.23).

The impact of public funding may also explain some of the popular dichotomy in which TAFE colleges are associated with a narrow approach to compliance while private and enterprise RTOs are associated with a more open approach. TAFE colleges draw a high proportion of their funding from public sources, while private and enterprise RTOs typically draw the bulk of their funding from non-public sources. If a TAFE college adopts complex documentation to provide evidence of compliance this could indicate either that the college is delivering quality programs or that it is focussed on meeting the requirements of the funding body rather than the needs of its learners. If a private or enterprise RTO aligns learning and assessment activities to workplace functions this might suggest either that the RTO is being flexible and responsive to local needs or that it is adopting a behaviourist approach to improving productivity and profit margins.

These issues began to emerge in the analysis of the interview data from this study. If there is any substance to the suggested association between public VET funding and narrow and rule bound approaches to compliance, then indications that government agencies are positioning to establish a national compliance policy with interpretational precedents and increased moderation of local audits have significant local implications. With increased national oversight of AQTF audits the narrow approach to compliance currently associated with public funding may point to a future benchmark for all RTOs.

‘Teacher’ vs ‘trainer’: A dichotomy of professional identities

This level of analysis leads me to directly challenge the adoption of simple TAFE and non-TAFE dichotomies to frame VET debates, particularly debates that relate to the professional identities of VET practitioners. One of the popular dichotomies operating within VET constructs TAFE practitioners as university qualified ‘teachers’ and professional educators, while practitioners working in private and enterprise RTOs are constructed as Certificate IV qualified ‘trainers’ who have vocational expertise but a low level of teaching and learning competence (Langdon 2005). Indications of this divisive
debate appeared in the interview data, with some informants expressing strongly critical views about other practitioners.

‘TAFE go their own merry way anyway. I think there’s still quite a few people in TAFE, program coordinators, who are still way back in accredited training and have no intention of changing. They just really do pay lip service to the Training Packages, and I think it’s an auditor’s nightmare going into TAFE. Because TAFE will comply, they’ll have all the right paperwork in place, but what’s going on underneath is not necessarily what should be going on underneath’. (Renee)

‘And I know for a fact that there are particular departments within TAFE institutes that are very well below standard. And you sit back, shut your mouth and say nothing. … We don’t want to be seen as troublemakers’. (Vanessa)

‘… and when I say education I mean private RTOs are in the training business, they’re not necessarily educators or have an educative background and therefore they have difficulty understanding all of these concepts and they don’t have the historical knowledge to be able to work with some of these things’. (Paul)

This dichotomy frames debates about VET policy and practice in a way that divides practitioners according to the kind of RTO they work in or the qualifications they hold. Yet the regulation of local learning and assessment practice through the requirements of national texts are system wide issues that impact on all practitioners.

Throughout the interview data language such as ‘you must’ and ‘you’re not allowed to’ provides ‘traces of oppressive organizational practices’ (O’Neill 1998, p.138). This language was not being used by inexperienced or novice practitioners but by experienced and often highly qualified education professionals. While the formal qualification requirement for VET practitioners is a Certificate IV qualification nearly half the informants in this study held or were undertaking tertiary or postgraduate qualifications in various fields, including education. University qualified practitioners did not work exclusively in the TAFE system but were also represented in both private and enterprise RTOs.

Within a regulatory framework where there is no requirement of local professional input beyond documentation of compliance the work of practitioners is essential to the functioning of the VET system. Yet practitioners are not only positioned as functionaries, they are also blamed for practices that they are compelled to adopt.
'I think that ultimately it’s the practitioner who gets the blame for the extent of Packages and the lack of flexibility that’s shown, and this that and the other. But ultimately it’s driven by restrictive practices put in by the same governments that are telling you to use them’. (Graham)

In a climate of increasingly prescriptive compliance, the body of VET practitioners as a profession are at risk of being deprofessionalised regardless of their qualifications, professional identities or employment status. While debates about practitioner qualifications and professional identity continue at a superficial level other forces that constrain the professionalism of practitioners throughout the sector go unchallenged.

**Conclusion**

In exploring the second element of my problematic, this chapter has revealed parallels between the status and operation of Training Packages and the status and operation of the AQTF. The analysis argued that learning and assessment practice is socially organised by the AQTF in the same way that workplace practice is socially organised by Training Packages. Within the National Training Framework these regulatory texts work individually and together to organise both the content and delivery of learning and assessment programs, shifting the policing of decisions away from education professionals to those with power in audit and compliance. If RTOs place responsibility for compliance in the hands of managers or administrators rather than practitioners the external shift in policing from local sites to AQTF auditors is accompanied by a parallel shift within local sites.

The AQTF standards use abstract language that needs to be interpreted. As practitioners and RTOs engage with the AQTF they seek out authorised readings to inform their decisions about compliance. The regulatory power of AQTF auditors to establish their own readings as authoritative is strengthened when auditors are positioned to provide advice at the point where RTOs and practitioners first encounter the AQTF standards in developing the local procedures and systems that govern learning and assessment practice.

The interview data revealed that the AQTF is capable of supporting a variety of readings. Broad readings allow practitioners a level of freedom to focus on local needs and create spaces for meaningful learning. The interview data revealed that such
readings are being achieved, and there is some indication of state training authorities encouraging such readings. In contrast, narrow and rule bound readings position practitioners as functionaries and establish the national texts themselves as the primary reference point in designing learning and assessment. When the regulatory and compliance function of the AQTF takes precedence local responses focus on how practice is documented rather than how it is enacted.

Writing up standardised learning and assessment practices that align to external reporting requirements reshapes local practice, in some cases replacing appropriate local practices with inappropriate practices that produce documentary evidence for audit but alienate and marginalise participants. VET practitioners recognise the dysfunctional aspects of such practices and in their dealings with participants they use their professional judgement and expertise to overcome the negative impact. This hidden work is unrecognised, and while such interventions are necessary to support participants they also serve to create an appearance that the VET regulatory framework is operating smoothly and efficiently.

Narrow and rule based readings of regulatory texts make practitioners accountable to decision making processes over which they have no control. Practitioners are aware of their loss of authority, but while they recognise the shift in policing from local sites to external AQTF auditors they do not see the parallel shift that is occurring within some RTOs. Some practitioners perceive different approaches to AQTF compliance as evidence of inconsistencies in audit processes rather than indicators of local readings imposed by their own RTO management. Practitioners are at risk of being drawn into government attempts to achieve national consistency by imposing a narrower range of readings of regulatory texts. This has potential to advance the shift in legitimacy that has not yet been achieved. VET practitioners as a profession need to find a united voice and actively challenge policy trends that have potential to entrench narrow and rule bound approaches as nationally consistent benchmarks and erode the opportunities that exist to create spaces for meaningful learning.

The following chapter will explore how national VET consultation and decision making processes respond to issues and concerns raised by VET practitioners.
Where the Training Package for Assessment and Workplace Training says:

- Opportunities are created within training session design for participants to manage own competency acquisition and apply the relevant competencies in practice

Someone working in the industry might say:

Plan training sessions to include practice activities.

Figure 6: Training Package language and workplace vernacular: Extract from Unit BSZ406A ‘Plan a series of training sessions’
Chapter Eight: ‘I see nothing has changed’: Practitioner concerns are ‘written down’, but are they ‘taken up’?

Introduction

The ruling relations of vocational education and training permeate VET activity at all levels. The preceding two chapters made visible the way in which local workplace practice and learning and assessment practice are socially organised by national VET texts including Training Packages and the AQTF. The present chapter will explore the third element of my problematic: in a regulatory framework that sees local practice connected to national policy agendas, how are VET practitioners positioned in decision making and policy development? It will examine the contradictions between national rhetoric of consultation and a record of official decision making in which the voices of participants and practitioners are silenced. The discussion will argue that VET practitioners can see the local contradictions and inconsistencies that arise from the regulatory structure of VET, but they have little input to consultation processes that are socially organised and aligned to national government policy approaches and conceptual frameworks.

The personal and professional disquiet that provided the impetus for this research project has been growing for nearly two decades. It was serendipitous that I would find myself undertaking the project over a three and a half year period that would also see national VET reviews of Training Packages, the AQTF, and the Training Package qualifications for VET practitioners, and would culminate in a major restructure of VET system governance. Informants in my study talked about their engagement with a number of national reviews, and my original intention in writing this chapter was to draw on this range of interview data to undertake a broad analysis of consultation and research processes within VET.

As the analysis unfolded, I found myself repeatedly drawn back to the data from one national review in particular: the review and development of the national qualifications for VET practitioners. I realised that I had what may be a unique opportunity to explore
Practitioner concerns are ‘written down’, but are they ‘taken up’?

the processes by which practitioner input to VET decision making is socially organised, by exploring how concerns about language were reshaped and subsumed in this consultation process. I decided to structure much of this chapter around the examination of a sequence of five texts generated as part of the review and development of the Training Package qualifications for VET practitioners.

**VET consultations: ‘flawed at all sorts of different levels’**

Earlier chapters have already noted that widespread practitioner disquiet about the language of Training Packages was clearly evident at every stage of my research project. As word of my research circulated within my professional networks people approached me to be interviewed. Colleagues sent me examples of Training Package language they encountered in their work. The interview data itself reveals significant concerns about this language and the impact it has on organisations, practitioners and participants. The presentations and workshops I conducted at practitioner forums were well attended and enthusiastically received, as were presentations in which other practitioners critiqued the use of an excluding language form in Training Packages (Marik & Brandner 2004; Oliver 2004). In view of all these indicators I was confronted with an obvious question: in a system which claims that decision making and policy development are based on consultation and research, how can this level of disquiet and practitioner debate apparently go unnoticed?

I say unnoticed because there is little or no acknowledgment of this issue either in research literature or in reports arising from VET consultation processes. When repeated database searches for critical papers on the use of excluding language in VET and Training Packages consistently produced nil results I began to wonder whether I was using the right search terms. I was reassured to read that other VET researchers have conducted similar literature searches with similar results (Anderson 2000, p.31). As some of my own papers and presentations began appearing on VET research databases other practitioner researchers contacted me to say that in their own literature searches my papers were the only references they had found. It would seem that the research literature has not recognised the concerns that are evident at practitioner level.
Practitioner concerns are ‘written down’, but are they ‘taken up’?

But how can these concerns fail to appear in consultations? VET practitioners have had several opportunities in recent years to put the language of Training Packages on the agenda for debate. Each Training Package must be submitted for re-endorsement every three years, a regular review process that should provide opportunities for practitioners to raise their concerns (DET Qld 2003, p.5). National reviews such as the High Level Review of Training Packages and the review of AQTF implementation also provided opportunities for practitioners to contribute. Some informants in my study had participated in one or more of these national reviews and still they approached my PhD research project as their only opportunity to have their say and place this issue on the agenda for debate. The interview data reveals a strong sense that VET consultation processes are not typically structured to effectively incorporate practitioner input and feedback, particularly input that is critical of current policy or practice.

‘Oh yeah, we consult lots. But in most cases the consultation … is flawed at all sorts of different levels. In my view. It’s flawed because we consult with the wrong people, in the wrong way, using the wrong language, and using processes that are not consultative. Like inviting people to come to consultation and report everyone who was invited as having been consulted, when only 3 people out of the 200 provided a response. That’s not a consultative process. Having consultation that consists of hooking a consultation to a link in a web site is not a consultative process, especially if it’s the ANTA web site, where you cannot find things unless you know your way around it very well, and even so it’s hard. … And then, people are consulted, people submit, make submissions to the consultation, and those submissions are ignored, because the consultation in most cases is a rubber-stamping. The conclusions have been reached way before the consultation process starts. So it’s a problem at all levels. Some of them are related to language, because language is used deliberately during the consultation to obfuscate, to confuse, and to misdirect. And to restrict access to the consultation as well, because they look at the questions that are being asked and they say “What does it mean?” and they don’t bother answering the questions. So the process then is “OK we asked you, you didn’t answer, so shut up and put up”’. (Cheryl)

‘I think [consultation] is a big misnomer. It’s a word that’s thrown around. I was part of a consultative group that looked at the working of [one] Training Package, and some of the problems with it … And some of the things in there were just completely irrelevant, and trying to push that through was really difficult. … [My suggestions] were being written down. Whether or not they were taken up I’m not sure’. (Christine)

VET research and consultation processes operate within a culture of showcasing best practice (Jasinski 2003), seeking out and highlighting particular examples that illustrate established policy and practice contributing to positive outcomes (for example: DET WA 2005a). Practitioners contributing to consultation processes often point to situations in which current policy is unable to support positive outcomes. Rather than
Practitioner concerns are ‘written down’, but are they ‘taken up’?

acknowledging the contradictions and using them to inform decision making these contributions tend to be overlooked or rationalised.

‘The unfortunate thing is there’s a lot of good people out there, and there’s probably a lot of innovative things happening in pockets. And that’s good in some senses that there are those things happening, it proves that it can be done. The unfortunate, or the mischievous part of it is they get held up as being examples of how good the system is working, when in fact the system falls down around your ears. And it’s sort of like this facade of “Look, here are 10 things happening nationally that innovative, groundbreaking, world class, all that sort of stuff”. And people focus on that and think “Gee, isn’t this great. We’ve done all this and it’s great stuff”. Behind the scenes, they don’t see the buildings burning and the collapsing tunnels, and the lost people and the damage that’s done. No one ever sees that stuff, and it’s not that we shouldn’t publicly hold up the good things that we do and say “This is what we should aspire to”, but we should also have the smarts to look at what’s going wrong and say “These are the things going wrong, and this is what we doing about trying to fix those things” and get those things that aren’t working up to that world class standard. I mean, everyone just wants to look at the good stuff, and nobody wants to fix up the – I’ve been to meetings where people have actually said “I don’t want to hear that, I don’t want to know about that”. … And I’m thinking “Well if you don’t want to hear it, how are we going to fix it?” And that’s the whole thing, it’s like the three monkeys, hear no evil, see no evil and therefore I speak no evil’. (Paul)

The input of practitioners is treated as a resource but the practitioners themselves are not agents in the decision making process (Smith, D.E. 1990a, p.91). This approach denies VET policy developers access to the benefit of the specialised knowledge that practitioners hold (Smith, D.E. 1990a, p.103) and it perpetuates established policy and practice in the face of contrary evidence.

The review and development of national qualifications for VET practitioners

The process by which practitioner input is ‘written down’ but not ‘taken up’ was made clearly visible in the review of the national Training Package qualifications for VET practitioners. In this process the Training Package for Assessment and Workplace Training [BSZ98] was reviewed and judged inadequate and the new Training and Assessment Training Package [TAA04] was developed to take its place. Issues relating to the use of VET institutional language arose at each stage of the process but concerns expressed by practitioners were reshaped, pre-empted and overridden in the official ‘institutional account’ (Smith, D.E. 1990b, p.212). This case is useful in its own right as an illustration of how even well documented practitioner concerns about the use of an excluding language form in Training Packages are suppressed at the level of the VET
Practitioner concerns are ‘written down’, but are they ‘taken up’?

‘institutional order’ (Smith, D.E. 1999b, p.197). It is also useful as a window onto a broader issue, bringing into view how the use of consensual language such as ‘consultation’ obscures social relations in which public debates come to be shaped by government priorities and agendas (Kinsman 1997).

My approach to this analysis has been both informed and inspired by Dorothy Smith’s examination of two sequences of texts, or textual conversations, in which issues raised in one text were subsumed by a later text that provided an alternative account of the events described (Smith, D.E. 1990b, pp.120-158; 1999b, pp.195-223). In both cases Smith took texts that had originally occurred in a definite sequence, laid them side by side, and undertook an analysis moving back and forth between them. In one case the sequence of texts (a report and a letter responding to the report) was part of a public debate about issues of sexism in a Canadian university faculty, and Smith described herself and her paper as part of the controversy (Smith, D.E. 1999b, p.196). It was Dorothy Smith’s (1999b, p.199) statement that ‘[i]t took the analysis reported in this chapter for me to be able to see how I had been implicated and how the Letter had been active in organising my consciousness’ that made me realise the significance for my own study of the analysis that I am presenting.

The five texts that I am exploring were developed by different authors, for different purposes, and at different stages of the review and development of the Training Package qualifications for VET practitioners. The first text was created in 1997 and the remaining four were created over a period from 2001 to 2004. As a VET practitioner who not only holds these qualifications but also develops and delivers programs aligned to them I actively participated in consultations and provided feedback. I was particularly interested in the way language issues were being addressed, and I downloaded and highlighted a number of key texts that were made available on the Internet as part of the consultation process. As I undertook the analysis for this chapter I laid these texts side by side and compared the approach each took to issues of language. As a participant in the process I was aware that the new Training Package as finally endorsed was a significant disappointment for those of us who had challenged the use of ‘VET speak’ and advocated that more widely accessible language be used. But it was only as I
undertook my analysis moving back and forth between the texts that I realised the extent to which widespread concerns that had been clearly expressed throughout the consultations were subsumed and overridden in the official responses.

I realised that my data presents what may be a unique opportunity to explore this process. The texts that I downloaded and highlighted as a participant in the process are no longer available on the Internet sites from which I accessed them. The only text now available is the new *Training and Assessment Training Package* which reflects the official VET approach to language issues. When this Training Package entered ‘textual time’ as a fully worked up account the traces of its development process were obliterated (Smith, D.E. 1990a, p.74). The *sequence* that renders the reshaping process visible no longer exists except in those few cases where individuals have retained copies of texts downloaded in the brief period of time they were available. The language issues that were clearly and consistently expressed in consultations have not only dropped off the agenda, the public record no longer contains any evidence that they were ever raised.

The following discussion will explore how this occurred.

**The five texts**

The five texts are:

- Text 1: The review of the first national competency standards for VET practitioners
- Text 2: The final report of the review of the *Training Package for Assessment and Workplace Training [BSZ98]*
- Text 3: Public comments on the second draft of the *Training and Assessment Training Package [TAA04]*
- Text 4: The endorsement submission for the *Training and Assessment Training Package [TAA04]*
- Text 5: The assessment guidelines and units of competency from the *Training and Assessment Training Package [TAA04]*
Each of the texts in its original form is a substantial document of many pages and each includes brief references to issues of interest to this study. The following discussion will present and explore extracts from each text that relate to the consultation process and the language issues raised throughout. Exploring this sequence involves some ‘archaeological’ work (Kinsman 1997, p.221) to place each of the texts, and the review and development process of which they are a part, into its political and historical context. The discussion will begin by placing the first national competency standards for VET practitioners within the historical context of the developing VET regulatory framework.

**Text 1: the review of the national competency standards for VET practitioners**

**Historical context**

The replacement of eight state and territory technical education systems by a single National Training Framework (NTF) was achieved through a succession of national government reports and committees of enquiry. The report of the Australian Committee on Technical and Further Education, known as the Kangan report (Kangan 1974), was retrospectively described as ‘a defining moment in Australian educational history. In one dramatic moment it pulled vocational education and training into the present’ (Keating, in Kearns & Hall 1994). The Kangan report may have pulled disparate state and territory systems into a single national system, but whether it pulled that system ‘into the present’ is open to debate. In contrast to the ‘broad and humanistic’ philosophy reflected in the Kangan report, the present VET policy context is characterised by a strong labour market orientation adopted in the National Training Reform Agenda (NTRA) (Free 1994, pp.17-18; Kirby 1994; Schofield 1994, p.61).

In the policy changes introduced under the NTRA the national government adopted an economic rationalist approach, characterised by deregulation of industry and labour markets, reduced government expenditure, and a focus on improving international competitiveness (Dawkins, in ACTU/TDC 1987, p.iii; Smith, E. & Keating 2003, p.18). The direct relationship between economic policy and training policy is evident in some
of the key national reports of the period. In 1987 the Australian Council of Trade Unions (ACTU) and the Trade Development Council (TDC) presented a report titled *Australia Reconstructed* (ACTU/TDC 1987) which positioned education and training policy as an integral component of a wide range of labour market, trade and other economic policies. Also published in 1987, *Skills For Australia* opened with the statement that ‘[t]he Government is determined that our education and training systems should play an active role in responding to the major economic challenges now facing Australia’ (Dawkins & Holding, in Dawkins 1987, p.iii). This was achieved through funding arrangements that linked education and training to economic, labour market and industry development policies in an effort to ensure that funds were spent ‘in accordance with national objectives and priorities’ (Dawkins 1987, p.13 & p.30). The Kangan report, *Australia Reconstructed*, and *Skills for Australia* were just three in a growing library of national government reports that explicitly connected vocational education and training directly to national economic policy.

The National Training Reform Agenda formally aligned VET policy to industry needs, and one of the key policy initiatives was the adoption of competency based training based on national industry competency standards (Jackson 1993b, p.54; NAWT 2001, p.2). The National Training Board was established in 1990 with responsibility for supervising the development of and endorsing national industry competency standards (Smith, E. & Keating 2003, p.42). The first competency standards for workplace trainers were endorsed just two years later, followed by standards for assessors one year after that (NAWT 2001, pp.21-24). These competency standards were a key component of the NTRA, as it was through the national qualifications aligned to these standards that VET practitioners learned how to implement competency based training and assessment within the national VET system.

At that time competency standards and qualifications were separate but related texts. Industry competency standards were developed and endorsed at national level, and individual RTOs used these national standards as the basis for locally developed programs which, once formally approved as ‘accredited courses’, led to Australian Qualifications Framework (AQF) qualifications. In 1996 Training Packages brought
Practitioner concerns are ‘written down’, but are they ‘taken up’?

national competency standards and qualifications together in a single national text for each industry sector. In 1997 the national competency standards for workplace trainers and assessors were reviewed as part of the development of the first Training Package qualifications for VET practitioners (NAWT 2001, p.25).

**How the review report addressed language issues**

The review report does not appear to have been a public document; I was able to locate one copy held by a VET organisation but my requests for access to that copy were not fruitful. However, citations included in a later text provide a tantalising glimpse. The 1997 review is directly quoted as stating that:

> The conclusions and recommendations are derived primarily from a subgroup of respondents who demonstrated sufficient expertise to make informed judgements. … Much of the target population demonstrated limited enthusiasm, very low levels of awareness and, in many cases, no familiarity, experience or expertise in the use of the Competency Standards for Assessment and/or the Workplace competency [sic] Standards. (Centre for Vocational Research, University of Melbourne, 1997 p.5, cited in NAWT 2001, p.25)

One might ask whether a lack of enthusiasm, awareness, familiarity, experience or expertise amongst the target population for a set of national standards might not raise questions about the standards themselves. The citations available do not suggest that the 1997 review explored this possibility. Instead the consultants are reported to have found that ‘most users were satisfied with the content, coverage, language, format and relevance of the existing units’ and only limited changes were made when the competency standards were incorporated into the *Training Package for Assessment and Workplace Training [BSZ98]* (NAWT 2001, p.26).

**Text 2: the review of the *Training Package for Assessment and Workplace Training [BSZ98]***

**Historical context**

The *Training Package for Assessment and Workplace Training* was endorsed in 1998, making it one of the earliest Training Packages developed and endorsed in the National Training Framework. Training Packages in general have been described as reflecting ‘the rules of the VET game’ (Schofield & McDonald 2004, p.8). This particular Training
Practitioner concerns are ‘written down’, but are they ‘taken up’?

Package was described as ‘a lynchpin of the current VET system’ because it not only provided the competency standards for VET practitioners, it was also seen as ‘providing the structural supports for national quality assurance arrangements of RTOs’ (NAWT 2001, p.1).

This Training Package only offered two qualifications: the Certificate IV in Assessment and Workplace Training and the Diploma of Training and Assessment Systems. In 2001 the Certificate IV in Assessment and Workplace Training acquired special status in the VET regulatory framework when nominated units of competency were specified in the AQTF as required qualifications for VET practitioners performing learning and assessment roles (ANTA 2001a, p.17). This AQTF requirement ‘firmly entrenched[d] the Training Package as the benchmark across all RTO environments – public, private, community, institutional or workplace’ (NAWT 2001, p.5). The special status of the Certificate IV in Assessment and Workplace Training is inferred in the way that VET practitioners rarely use its full title, typically referring to it as ‘the Certificate IV’ or simply ‘the Cert IV’. With more than eighty existing Training Packages there are many AQF Certificate IV qualifications available but only one of these is commonly referred to and recognised throughout VET as ‘the Cert IV’.

While this qualification requirement was introduced as part of government attempts to establish ‘a nationally consistent, high quality, vocational education and training system’ (ANTA 2001a, p.1), mandating it had unforseen consequences. A surge of demand from practitioners who now needed to satisfy the AQTF qualification requirements created market pressures to drive down both the cost of the Certificate IV and the time and effort involved in acquiring it (TAC 2003, p.11). While some RTOs continued to offer higher quality programs, there was no shortage of RTOs that responded to the market demand by offering ‘high volume, low cost, negligible quality’ programs (NAWT 2001, p.132). In response the National Training Quality Council identified delivery of the Certificate IV in Assessment and Workplace Training as a ‘risk to the vocational education and training system’, and a national Strategic Industry Audit of all RTOs delivering this qualification was conducted in 2002 (TAC 2003, pp.11-12). While the Strategic Industry
Audit examined *delivery* of the Certificate IV qualification, the Training Package *itself* was formally reviewed in 2001.

The review process was highly political and at times emotionally charged. Reviewing this Training Package and then developing, validating and obtaining endorsement for the new *Training and Assessment Training Package* was described by one of the informants in my study as ‘the most awesome project’ (Vanessa). The overall project spanned four years, beginning with the first round of review consultations in October 2000 and concluding with the endorsement of the *Training and Assessment Training Package* on 1 October 2004 (ANTA 2004a, title page; NAWT 2001, app.2).

The consultations undertaken as part of the initial review phase were unprecedented. Approximately 1000 people including VET practitioners, managers, consultants and personnel from VET authorities participated through face-to-face consultations or questionnaires, and there was an ‘extraordinary level of unanimity from workshop to workshop in identifying key issues, needs and gaps’ (NAWT 2001, p.13).

**How the Training Package review addressed language issues**

RTO and practitioner concerns about language were well documented in several sections of the final report. The executive summary stated that:

> There is clear justification for thoroughly editing the existing units to address duplication/repetition between units, inconsistent terminology, complex language … The units should be rewritten in plain English and active voice. (NAWT 2001, pp.i-ii)

‘Language and terminology concerns’ were allocated an entire section within the body of the report, and discussion of these concerns included the following:

One of the most common issues raised in response to the Training Package is the complexity of the language. Common reactions from participants in the consultations were ‘unnecessarily academic’, ‘obtuse’ and ‘difficult to comprehend’. The inconsistent use of technical terminology within and across the competency standards was also identified as a problem. …

The Review team believes it is critical that persons who are to become trainers and assessors themselves, can read, comprehend and use these standards independently.

The complexity and inconsistency of language creates a perception that the Training Package is not user-friendly. It also represents a significant accessibility issue that will need to be addressed.
Practitioner concerns are ‘written down’, but are they ‘taken up’?

A common suggestion by workshop participants is to rewrite the units in plain English. (NAWT 2001, p.44)

The report included a number of specific comments made by informants to the review:

For many practitioners, coming from a technical background, the “educational” language is difficult and capable of misinterpretation. (Enterprise/industry RTO, Vic)

Just terrible!! It is educationally unsound, full of ambiguity. The reading difficulty is enormous. (Commercial RTO/consultant, Brisbane)

Passive voice, too many actions in each performance criteria. Many are simply procedures not criteria for assessment. (Commercial RTO, Brisbane)

Appears to be written by academic bureaucrats. Needs to be considerably simplified. (Commercial RTO, Brisbane). (NAWT 2001, p.45)

While acknowledging a need to maintain ‘essential technical language’, the review formally recommended:

That the existing units of competency be thoroughly edited and revised in plain English. As part of this editing process the following issues are to be addressed:

(i) complex language is replaced to facilitate understanding by a wide audience
(ii) technical language is used consistently and defined in the Training Package glossary
(iii) the Evidence Guides, Range of Variables (ROV) and Assessment Guidelines to specify requirements for achieving competency in unequivocal terms
(iv) duplication / overlap in unit content is reduced
(v) Key Competencies are more clearly integrated within units
(vi) Knowledge requirements are embedded throughout the unit structure
(vii) LL&N requirements to be further evaluated and clearly specified
(viii) Units to represent whole work functions / processes. (NAWT 2001, p.v)

These extracts from the final report indicate that RTO and practitioner concerns about language had been written down. An examination of later public texts that emerged from the development of the Training and Assessment Training Package [TAA04] provides little indication that the concerns were taken up.
Text 3: Public comments on the draft Training and Assessment Training Package [TAA04]

Historical context

The development of the Training and Assessment Training Package involved functional analysis workshops, research, extensive face-to-face consultations, and opportunities for input to be provided online (BSTA 2004, p.16). The results of the AQTF Strategic Industry Audit which examined delivery of the Certificate IV qualification were also provided to the Training Package development team (TAC 2003, p.12).

While much of the development process was highly consultative and conducted in the public arena, a number of parallel but influential activities were conducted out of public view. The first of these was a teleconference between national, state and territory VET authorities to review the recommendations arising from the review of the earlier Training Package (BSTA 2004, p.15). The teleconference agreed to proceed with development of the new Training and Assessment Training Package ‘in line with agreed and amended recommendations and actions’ (BSTA 2004, p.15). As there is no public record of the official response to each of the recommendations made in the 2001 review report, it is not possible to establish whether the recommendation to edit the units in plain English was agreed, amended or even rejected. An examination of public documents relating to the new Training and Assessment Training Package reveals no further reference to this recommendation in any official text after this point.

Another activity that was conducted out of public view was the establishment and operation of a reference group ‘comprising senior representatives of the Commonwealth, States and Territories … to provide a focal point for State, Territory and Commonwealth input into the Training Package development and related issues’ (BSTA 2004, p.15). Following normal practice the review and development project was overseen by a steering committee that included representatives of public and private RTOs, practitioner groups, higher education authorities, Industry Training Bodies, a representative from one State Training Authority, and ANTA (ANTA 2004b, pt.1, ch.2, p.6; BSTA 2004, pp.12-13). In a significant departure from normal practice, the state and territories reference
group was established in *addition* to the steering committee, and held ‘no less than twelve (12) meetings’, compared to six steering committee meetings (BSTA 2004, p.15).

The *Training and Assessment Training Package* went through three significant drafts plus a series of further amendments (BSTA 2004, p.17). The second draft was made available for comment on an Internet site set up for this purpose (BSTA & NAWT 2002).

**How the public comments addressed language issues**

The following three examples are drawn from a number of comments that addressed the language used in the draft Training Package.

The language of these competences [*sic*] may prove daunting to many of the students currently undertaking the Certificate IV in VET. The AQTF requirement that students are provided with the assessment criteria for the units they are undertaking means that there is a risk that some potential students will consider that they will be unable to successfully complete the competencies and drop out. This will create a barrier for certain populations, particularly those who have been out of the education arena for some time, those without strong literacy skills and those from cultural and linguistically diverse backgrounds. (BSTA & NAWT 2002, ID#129)

At the outset of the review, emphasis was placed on the goal of simplifying the jargon and level of language used in the current training package. This was highlighted as one of the reasons for the overhaul of the existing package. It appears that this has been ignored. There has been no change … Many RTO’s [*sic*] were overwhelmed by the language of the AWT Package and I fear they will be disillusioned by this lot. … It will require considerable interpretation by those of us who have spent the past four years or more explaining all the jargon in the current package. (BSTA & NAWT 2002, ID#41)

I have held off with my comments because I thought the project team were going to incorporate the concerns that I know have been raised time and again at the focus group meetings, but I see nothing has changed. …. The terminology is in a lot of cases very awkward … Having, in a former life, responsibility for endorsing competency standards I started writing suggestions on how to improve them but found myself spending far too much time on the first few pages so gave up. (BSTA & NAWT 2002, ID#64)

These comments not only confirm ongoing practitioner concerns about the use of complex and excluding language, they also reveal an emerging concern that issues that had been raised in consultations had not been addressed in the draft.
Text 4: Endorsement submission for the *Training and Assessment Training Package [TAA04]*

**Historical context**

After further consultations and editing the new *Training and Assessment Training Package* was initially submitted for endorsement in June 2004. The formal endorsement submission stated that:

> The TAA04 Training Package is designed to meet the contemporary competency development needs of persons and organisations involved in the provision of training and assessment services. It has application to both recognised training and assessment and non-recognised training such as in-house or product based training. (BSTA 2004, p.3)

This statement gives the Training Package coverage that not only encompasses, but also extends beyond, the full diversity of the national VET sector. The endorsement submission outlined the history of the review and development process, stating that:

> … the TAA04 Training and Assessment Training Package … has been developed in accordance with due process through probably the most extensive iterative development and consultative process of any Training Package.

> Given its wide range of audiences and applications it is unlikely that it could or would be supported by every single stakeholder in vocational education and training. However, BSTA has full confidence that it is a quality product that is supported by the vast majority of those who have contributed to its development/participated in the process. (BSTA 2004, p.4)

The endorsement submission also gave some emphasis to the role played by VET authorities through the State and Territories Reference Group.

The Reference Group was a pivotal part of the development process, providing significant and direct input into each of the drafts and providing a conduit to support the wider consultations in each State and Territory. Members contributed enormously to the final product.

The approach adopted in developing the TAA Training and Assessment Training Package is unique and has ensured that every step of the way States and Territories and the Commonwealth government have had direct input into the final Training package [*sic*] product. (BSTA 2004, p.15)

This reflects the high level of government interest and influence in the qualifications for VET practitioners.
How the endorsement submission addressed language issues

The endorsement submission included the following statement:

**Language and Literacy and Numeracy (LLN) Review**

In accordance with requirements, a comprehensive review of LLN was undertaken of the third draft of the Training Package by [name of consultant] to ensure that language and literacy used throughout the Training package [*sic*] is appropriate to the audience and to ensure the units effectively address language, literacy and numeracy roles and responsibilities of persons involved in the provision of Training and Assessment services. (BSTA 2004, p.24)

The submission made no reference to the language concerns raised in the consultations undertaken throughout the review and development process.

**Text 5: Assessment guidelines and units of competency from the Training and Assessment Training Package [TAA04]**

**Historical context**

State, territory and commonwealth training authorities explicitly exercised their authority when they refused to sign off the draft *Training and Assessment Training Package* that was submitted for endorsement in June 2004. Their concerns resulted in further work on the draft which was eventually endorsed on 1 October 2004.

The *Training and Assessment Training Package [TAA04]* has now superseded the *Training Package for Assessment and Workplace Training [BSZ98]* both as an endorsed Training Package and in the AQTF qualification requirements for VET practitioners.

**How the new Training Package addresses language issues**

At least two core (mandatory) units from the new *Certificate IV in Training and Assessment* include assessable performance standards which require participants to demonstrate that they are able to deal with the language of VET and of Training Packages. The unit ‘use Training Packages to meet client needs’ includes the following performance criteria:

2.1 The *qualifications framework* of the selected Training Packages and/or accredited courses, including the *packaging rules*, is read and interpreted accurately
Practitioner concerns are ‘written down’, but are they ‘taken up’?

3.2 *All parts of the competency standard and/or accredited modules format* and structure are read, analysed and interpreted for meaning.

5.1 All sections of the Assessment Guidelines of the Training Package/s and/or accredited courses are read, interpreted and applied to the application. (ANTA 2004a, pp.126-127 [emphasis original])

The unit ‘work effectively in vocational education and training’ includes the following performance criterion:

1.6 *Vocational education and training terminology* is used to communicate effectively within the sector (ANTA 2004a, p.72 [emphasis original]).

The use of italics to emphasise particular terms within performance criteria indicates to the reader that further information about the italicised terms is provided in the unit range statement or evidence guide. The range statement for ‘work effectively in vocational education and training’ elaborates on performance criterion 1.6 as follows:

*Vocational education and training terminology* includes but is not limited to:

- acronyms
- language of the profession
- language styles commonly used in vocational education and training environments (refer to the Glossary for the TAA04 Training and Assessment Training Package). (ANTA 2004a, p.75 [emphasis original]).

The Training Package assessment guidelines explicitly state that:

The TAA assessor is responsible for ensuring the integrity of the assessment process of the Training and Assessment Training Package (TAA04) units. Part of this responsibility involves the provision of initial advice to TAA candidates to ensure they are fully aware of the assessment requirements of the Training and Assessment Training Package (TAA04) units including the underlying language, literacy and numeracy (LL&N) and other skill requirements embedded within these units. This advice ensures TAA candidates can make an informed decision about proceeding with training and/or assessment in Training and Assessment Training Package (TAA04) units or qualifications, …

**English language, literacy and other skill requirements**

It is part of an RTO’s responsibility to provide appropriate information to candidates to ensure they understand the requirements of the units of competency prior to assessment. TAA assessors carrying out this responsibility must ensure TAA candidates/potential candidates are advised effectively of the underlying skill requirements of Training and Assessment Training Package (TAA04) units.

In particular, advice about the underlying level of English language and literacy required to meet the outcomes of Training and Assessment Training Package (TAA04) units must be made clear prior to commencement of the learning and/or assessment process, and candidates who may have
difficulty meeting these requirements must be provided with advice and options such as appropriate language and literacy skills training.

Candidates must also be advised that competence will include assessment of the specified language and literacy Performance Criteria and required skills of individual Training and Assessment Training Package (TAA04) units. This includes effective language, communications and interpersonal skills and the ability to write a range of documentation. For example, TAA candidates are expected to read and interpret Training Packages, develop and document learning programs and assessment tools, present information, facilitate in a number of contexts using a range of skills, and prepare various records and documents. (ANTA 2004a, pp.42-43)

This official response reshapes and overrides the practitioner concerns that were consistently raised throughout the consultation process.

**Reshaping and overriding practitioner concerns**

As I worked through this sequence of texts I was initially taken aback that the impact of an excluding language form had been recognised and then subsumed in two separate review and development processes. When the first competency standards for workplace trainers and assessors were reviewed in 1997 much of the target population was found to lack awareness, familiarity, experience or expertise in using the standards yet the review concluded that most users were satisfied with the language used in those standards.

When the Training Package for Assessment and Workplace Training was reviewed in 2001 the complex language was one of the most common issues raised in consultations and was identified as a significant accessibility issue. And yet the official response has been to entrench the use of this language as a compulsory assessable requirement and to suggest that individuals who have difficulty with this language may require training to improve their own (presumed deficient) language and literacy skills. These responses reveal how the issue raised in consultations has been reshaped and redefined in consultation processes that were aligned to national VET policy rather than to local needs.

The issue raised in consultations is that individuals and organisations engaged in learning and assessment roles are often excluded by the language used in the national qualifications for VET practitioners. When the first competency standards were reviewed in 1997, the review report appears to have uncovered this issue when it found that most of the target audience for the standards was unable to work with them. In
response, the review seems to have reshaped the issue by deciding that only people who could demonstrate ‘sufficient expertise’ in working with the standards would be authorised to speak and be heard in the review. This response shifted the focus from the appropriateness of the standards to the expertise of the people working with them and in making this shift any questions about the language of the standards were pre-empted. The issue was again made visible throughout the Training Package review and redevelopment process that commenced in 2001. Once again the official response shifted the focus from the suitability of the language to the characteristics of the people who are trying to engage with it.

The sequence of texts presented here clearly illustrates how the issues raised by practitioners were reshaped and overridden. The following discussion will draw out particular extracts within this sequence to focus the analysis on three issues: the difference between narrative accounts and organisational responses; what the official texts are not saying; and the establishment of the institutional language of VET as an assessable language benchmark. The discussion will then explore the status of the Training Package qualifications for VET practitioners and the implications this had for the review and development process. It will close with some comment about the prospects for grassroots change within VET.

**Narrative accounts and organisational responses**

When practitioners engaged with the consultation processes they contributed what they knew based on their experience in local sites. But the authoritative descriptions generated from those consultations ‘wrote up’ the local experience in ways that established a rupture between the official account and the lived experience (Smith, D.E. 1984, cited in Campbell 2003, p.15). Practitioner contributions to the consultation process were typically presented in the form of narrative accounts grounded in local experience. In contrast, the official statements about ‘LLN’ were written up using organisational literacy. This is illustrated by returning to the extracts presented above, drawing out and directly comparing specific extracts from three of the texts.
Practitioner concerns are ‘written down’, but are they ‘taken up’?

Text 3 (public comments):

The language of these competences [sic] may prove daunting to many of the students currently undertaking the Certificate IV in VET. … there is a risk that some potential students will consider that they will be unable to successfully complete the competencies and drop out. (BSTA & NAWT 2002, ID#129)

At the outset of the review, emphasis was placed on the goal of simplifying the jargon and level of language used in the current training package. This was highlighted as one of the reasons for the overhaul of the existing package. It appears that this has been ignored. … Many RTO’s [sic] were overwhelmed by the language of the AWT Package and I fear they will be disillusioned by this lot. (BSTA & NAWT 2002, ID#41)

Text 4 (endorsement submission):

… the TAA04 Training and Assessment Training Package … has been developed in accordance with due process …

In accordance with requirements, a comprehensive review of LLN was undertaken of the third draft of the Training Package by [name of consultant] to ensure that language and literacy used throughout the Training package [sic] is appropriate to the audience. (BSTA 2004, p.24)

Text 5 (Training Package assessment guidelines):

The TAA assessor is responsible for ensuring the integrity of the assessment process of the Training and Assessment Training Package (TAA04) units. Part of this responsibility involves the provision of initial advice to TAA candidates to ensure they are fully aware of the assessment requirements … This advice ensures TAA candidates can make an informed decision about proceeding with training and/or assessment …

In particular, advice about the underlying level of English language and literacy required … must be made clear prior to commencement of the learning and/or assessment process, and candidates who may have difficulty meeting these requirements must be provided with advice and options such as appropriate language and literacy skills training. (ANTA 2004a, pp.42-43)

The extracts from Text 3 focus on the language, and they establish three points. First, they assert that the language used in the Training Package is inappropriate and acts as a barrier to particular individuals, groups and RTOs. Second, they identify a need for the language to be simplified. Third, they reveal a clear expectation that the review process should have addressed this issue. Texts 4 and 5 use organisational literacy to reshape and override each of these points. First, they establish that the language in the new Training Package is appropriate and they infer that individuals who experience difficulty may have inadequate language and literacy skills. Second, they establish that there is no requirement for the language to change but suggest that some participants may need
language and literacy skills training. Third, they assert that the review process has satisfied ‘due process’ and ‘requirements’.

The issue introduced in Text 3, that the language of the Training Package excludes particular individuals and groups, is still present in Texts 4 and 5 but it has been reshaped. In Text 3 the potential for this language to exclude is a matter of concern; potential students may ‘drop out’. In Text 5 the emphasis on advising prospective participants about the embedded language and literacy requirements and offering advice and alternatives reveals an expectation that there will be people approaching this Training Package who will not understand the language. But rather than being a matter of concern, limiting access to people who are able to use this language is now required to ensure the ‘integrity of the assessment process’. Individuals who are put off by this requirement are making ‘an informed decision about proceeding with training and/or assessment’. On all the points raised the use of organisational literacy in the later texts expresses the ‘mandate’ of the VET policy framework and ‘functions to claim actuality for organizational purposes’ (Smith, D.E. 1990b, p.153).

What is not being said in the official texts

Further analysis of two extracts from Text 4 (the endorsement submission) highlights a number of particularly interesting issues both in what these extracts say and also in what they do not say.

… the TAA04 Training and Assessment Training Package … has been developed in accordance with due process through probably the most extensive iterative development and consultative process of any Training Package. (BSTA 2004, p.4)

In accordance with requirements, a comprehensive review of LLN was undertaken of the third draft of the Training Package by [name of consultant] to ensure that language and literacy used throughout the Training package [sic] is appropriate to the audience and to ensure the units effectively address language, literacy and numeracy roles and responsibilities of persons involved in the provision of Training and Assessment services. (BSTA 2004, p.24)

Here are two statements that the Training Package was developed in accordance with ‘due process’ and ‘requirements’. The Training Package Development Handbook
Practitioner concerns are ‘written down’, but are they ‘taken up’?

(ANTA 2004b) presents four volumes of requirements, a number of which are relevant to this analysis⁶.

The Handbook explicitly advises that units of competency should be written in ‘plain English’, and warns that ‘jargon’, ‘difficult phraseology’ or ‘unclear language and terminology beyond workplace requirements’ may ‘disadvantage’ learners (ANTA n.d., pt.6, sect.2, p.7; ANTA 2004b, pt.4, ch.1, p.9). This advice applies to all Training Packages yet the endorsement submission makes no reference to it. The submission similarly fails to acknowledge the evidence consistently raised throughout consultations that the use of jargon and difficult phraseology in this Training Package was indeed disadvantaging learners, neither does it refer to the recommendation from the 2001 review that the units of competency be edited in plain English.

The Training Package Development Handbook specifies that those who contribute to review consultations must receive ‘prompt and positive feedback on their contribution, and a summary of how issues and concerns raised have been addressed and resolved’ (ANTA 2004b, pt.1, ch.2, p.8). The endorsement submission provides no feedback on how the concerns about language that emerged as ‘one of the most common issues raised’ in unprecedented national consultations which found an ‘extraordinary level of unanimity’ have been addressed and resolved.

The Handbook advises that drafts ‘should be circulated to interested parties until a consensus is reached’ (ANTA 2004b, pt.2, ch.1, p.4). There is clear evidence that drafts were circulated and also made available on the Internet, but little evidence of a consensus being reached about the language.

Despite the explicit statement in the Handbook that ‘no stakeholder has an automatic right of veto’ (ANTA 2004b, pt.2, ch.1, p.4), the development process apparently

⁶ While the Training Package Development Handbook was revised during the period in which the Training and Assessment Training Package was being developed, this revision did not involve significant change to the advice on issues of interest to my study.
disregarded ongoing expressions of concern from practitioners and RTOs but allowed national, state and territory training authorities ‘direct input’ into the Training Package.

Overall the endorsement submission highlighted the ‘extensive iterative development and consultative process’ as a point in favour of the newly developed Training Package but it remained silent on the language issues that were consistently raised by practitioners and RTOs throughout that process.

In one respect there is little imperative for the endorsement submission or the Training and Assessment Training Package to acknowledge or respond to these issues. These two texts entered what Dorothy Smith called ‘textual time’ (Smith, D.E. 1990a, p.74) in late 2004, three years after the release of the review report that had recommended the use of plain English and approximately 12 months after the Internet site for public comment on the draft had closed. These earlier texts were the only public record of the detailed issues raised in consultations but by the time the draft Training Package was submitted for endorsement they were no longer available. Few readers would approach the endorsement submission or the new Training Package aware of the detail contained in the earlier texts, and even fewer would approach them as I did with highlighted copies of the earlier texts to use as the basis for comparison. There was no need for the endorsement submission or the Training Package to refer to the issues documented in the narrative accounts of those earlier texts; they had been bypassed by events.

Dorothy Smith (1990b, p.154) argued that institutional language ‘is capable of subsuming and claiming an indefinite variety of actual sequences of action’, and the information that was contained in the detail which has been subsumed is lost and cannot be recovered. In the sequence of texts examined here the detailed accounts provided by practitioners are subsumed and displaced by institutional references to ‘LLN’ (‘language literacy and numeracy’). From a range of formal requirements that could apply to the treatment of language issues in the development of this Training Package the endorsement submission refers only to the requirement that an ‘LLN review’ be undertaken. The submission states that a consultant (presumably with particular expertise in ‘LLN’ matters) has reviewed the Training Package and confirmed that the ‘language and literacy used throughout the Training package [sic] is appropriate to the
Practitioner concerns are ‘written down’, but are they ‘taken up’?

audience’. In asserting the appropriateness of the language this institutional statement subsumes all the detailed evidence which suggests that in many contexts this language is highly inappropriate. The detail that would challenge the institutional position is lost and cannot be recovered.

**Establishing institutional language as an assessable benchmark**

The intended audience for the Training Package includes all individuals and organisations involved in training and assessment within VET and beyond. What language is ‘appropriate’ for this audience is not explicitly defined; it must be inferred from the language benchmark established in the Training Package competency standards. To be assessed as competent an individual must demonstrate that they are able to read and interpret Training Packages and communicate using acronyms, jargon and VET language styles and terminology as represented in the Training Package glossary. This benchmark is reflected in the language form used throughout the Training Package, which is characterised by acronyms, jargon and language styles including features (such as passive voice, complex and unfamiliar terms and wordiness) that were criticised in the consultations. It is a circular argument. By establishing the use of this language as the benchmark for people involved in vocational training and assessment it can be argued that using this language *within the Training Package* is appropriate to this audience. In turn, stating that the formal ‘LLN’ review confirmed that the language is *appropriate* to the audience gives some authority to the use of that language as the benchmark for competency. The benchmark is established as an objective standard applicable in all local contexts in which vocational learning and assessment is undertaken and the circular argument leaves no room for this benchmark to be challenged by reference to the needs of particular local contexts.

Where does this leave the RTOs, VET practitioners and participants who, throughout the review and development consultations and also throughout my own study, reported that they struggle to understand the language of Training Packages in general and this Training Package in particular? Establishing this language as the benchmark for competence infers that these people are *either* not members of the target audience, *or* are in need of language and literacy skills training, *and* would have difficulty demonstrating
Practitioner concerns are ‘written down’, but are they ‘taken up’?

competence in two compulsory core units of the new *Certificate IV in Training and Assessment*. These inferences are not sustainable in view of the considerable experience, expertise and qualifications held by the practitioner informants in my study.

**The status of this Training Package and implications for the review and development process**

The Training Package that holds the qualifications for VET practitioners is accorded unique status as a regulatory text that encompasses some of the authority of both Training Packages and the AQTF. As a text it has the formal regulatory status of an endorsed Training Package but it also acquires some of the regulatory status of the AQTF in that it governs the implementation of all other Training Packages (NAWT 2001, p.1).

Training Packages are an integral component of the ‘complex field of coordinated activities’ that make up the ruling relations of VET (Smith, D.E. 1999b, p.79); they do indeed reflect the ‘rules of the VET game’ (Schofield & McDonald 2004, p.8). Dorothy Smith (1999b, p.79) argued that ‘[t]ext-mediated relations are the forms in which power is generated and held in contemporary societies’. Within the Australian VET sector power is generated and held through ruling texts that include Training Packages and the AQTF.

As material texts Training Packages and the AQTF are exactly the same in every learning and assessment context in which they are used. They share the property that Dorothy Smith (1999b, p.79) called ‘indefinite replicability’ but they are only activated as they are read by particular people in particular local sites. When VET practitioners use these texts as the basis for learning and assessment programs the texts connect the local site directly into the ruling relations of VET. Both the workplace practice that is addressed in the *content* of the program and the learning and assessment practice incorporated in the *structure* of the program are directly connected to a government agenda of national consistency.
Practitioner concerns are ‘written down’, but are they ‘taken up’?

The complex and abstract language typical of these texts is capable of many different interpretations. ‘Indefinite replicability’ and ‘national consistency’ will only be achieved if the people reading the texts in different sites read them in the same way. The Training Package qualifications for VET practitioners provide the vehicle through which practitioners learn to read national VET texts and to organise their professional practice to align to the texts in ways that will support the policy goal of national consistency.

Professional development activities in any field inculcate particular ways of thinking and behaviour that characterise membership of the profession (Campbell & Gregor 2002, p.71). Through the Training Package qualifications for VET practitioners participants do more than just learn how to plan and implement learning and assessment programs; they learn to align their activities to the particular requirements of the National Training Framework. These qualifications ‘insinuate ruling ideas into local settings where workers themselves will carry them forward’ (Campbell & Gregor 2002, p.69). It was this property that made the Training Package for Assessment and Workplace Training a ‘lynchpin of the current VET system’ (NAWT 2001, p.1).

The special status of this Training Package introduced a number of tensions and contradictions in the review process. The Training Package Development Handbook specifies that Training Package reviews must involve consultation across ‘the full diversity of the industry’ and seek advice on ‘any implementation issues or barriers impeding training and assessment’ (ANTA 2004b, pt.1, ch.2, p.8). In reviewing the Training Package for Assessment and Workplace Training the ‘industry’ encompassed the whole VET sector. RTOs and practitioners approached the consultations not just as providers but also as the primary target group for the qualifications. Informants in my study argued that in other industry areas industry’s capacity to make effective input to Training Package reviews is often constrained by a lack of familiarity with VET and Training Packages. In contrast, industry input to the review of the Training Package for Assessment and Workplace Training was well informed, provided by people who were knowledgeable readers of Training Packages and familiar with the VET context. But involving the ‘full diversity’ of a well informed industry in reviewing a Training Package that was a ‘lynchpin’ of the VET system and a key component of the ‘rules of the VET game’ exposed fundamental issues to public critique.
Practitioner concerns are ‘written down’, but are they ‘taken up’?

The VET sector is a widely diverse and complex federal system based on government agreements, with multiple layers of decision making and widely varying practices; the result is ‘a very dynamic system’ which is ‘inherently unstable’ (Smith, E. & Keating 2003, p.51). Practitioners and RTOs who worked with the *Training Package for Assessment and Workplace Training* were aware of the contradictions inherent in the VET system and they saw people being marginalised by the discrepancy between learning and assessment practice as it is enacted in local sites and as it is described in the Training Package standards. It is through the hidden work of RTOs and practitioners in local sites that such contradictions are resolved and the ‘inherently unstable’ VET system takes on the appearance of working smoothly (Campbell & Gregor 2002, pp.20-23). When practitioners and RTOs participated in the review they made these contradictions visible. For the review and development process to take these issues on board and respond to them in a substantive way could have had serious implications for the system as a whole. If the National Training Framework is to achieve the policy goal of national consistency the Training Package that contains the qualifications for VET practitioners *must* be consistent with other ruling texts such as Training Packages, the AQTF and the AQF. The qualifications through which VET practitioners learn to read national texts to achieve indefinite replicability cannot be inconsistent with those national texts.

**The scope for grassroots change**

The review and development process was confronted with the ‘multiple and diverse interests and knowledge’ (Smith, D.E. 1999b, p.16) at work within the ruling relations of VET, including national, state and territory governments, industry, enterprises, training organisations, local communities, individual practitioners and participants (Chappell, Hawke et al. 2003 p.vii). Within each of these groups there is further diversity, resulting in what Catherine Down (2003, p.13) described as ‘multi-voicedness’, and presenting quite different (sometimes incompatible) views and needs (Chappell 2003, p.26; Harris & Simons 2003). Yet the consultation process was required to produce an outcome in the form of a new Training Package that would win government endorsement. Dorothy Smith (1999b, p.16) argued that new knowledge produced in these situations will be
Practitioner concerns are ‘written down’, but are they ‘taken up’?

Practitioner concerns are ‘written down’, but are they ‘taken up’?

oriented to the ruling relations rather than to the interests and needs of those who are ruled. Instead of responding substantively to the concerns and contradictions raised in consultations the development of the *Training and Assessment Training Package* was oriented to the existing regulatory framework of VET and it reshaped the issues raised in ways that aligned them to that framework.

But herein lies a major contradiction within the VET sector’s claim that decisions are based on wide consultation. While consultation processes are aligned to the existing conceptual frameworks and policy agendas of VET there is little or no room for practitioners to raise fundamental contradictions and inconsistencies that they see in the operation of the system at local level.

Gary Kinsman (1997) provided an example of this process in his analysis of the disjuncture between the needs of community-based AIDS groups and AIDS policy in Canada. Kinsman showed how consultation processes undertaken as part of policy development revealed different and conflicting interests among the participating agencies and institutions. In attempting to mediate these interests the federal AIDS strategy adopted the standpoint of government and administration rather than that of AIDS activists or people living with AIDS. The result was a document that ‘develop[ed] a hegemonic administrative framework for incorporating community-based groups into a state regulatory strategy’ (Kinsman 1997, p.221). The adoption of terms such as ‘partnership’, ‘collaboration’ and ‘consultation’ as crucial organising concepts in this process conveyed a sense of neutrality and consensual decision making and obscured the underlying struggles in which consultative arrangements were shaped by government political and economic agendas. Despite the disjuncture between community needs and government policy this consensual language made it difficult for community groups to oppose the AIDS strategy, and their criticism tended to be neutralised.

The use of consensual language in the review and development of the Training Package qualifications for VET practitioners similarly moderated criticism and fostered acceptance of the new *Training and Assessment Training Package*. Just as the endorsement submission emphasised the ‘extensive iterative development and
consultative process’ (BSTA 2004, p.4), informants in my study also spoke positively about the wide consultation process:

‘As for the consultation for the workplace assessment Training Package. That’s been amazing, it’s just gone on and on. Do they need that much input? Could they just not have drawn the line and say “Well you know, we’ve got lots of input here, and everybody else thank you but we’ve got enough”. It must have cost them a fortune. … they really have to draw the line somewhere. But I think they lost control of that one’. (Renee)

Through my own experience as a VET practitioner participating in these consultations I accepted, and still accept, that that there was a genuine will and desire on the part of the development team to respond effectively to the language issues raised in the consultations. Yet analysis of the five texts examined in this chapter indicates that there was never any real prospect of the language changing and reveals that at no point could it be said that government interests ‘lost control’ of the development of this Training Package.

By participating in the extensive consultation processes many practitioners have been drawn into accepting the outcomes even when those outcomes reflect dominant interests and agendas. This is not a process of hegemony being imposed by government action but of VET practitioners accepting a form of hegemony that is the negotiated outcome of an apparently consensual process (Kinsman 1997, p.224). For there to be any possibility of democratic and grassroots change occurring within VET practitioners must recognise and challenge the socially organised processes that see local needs and concerns reshaped and subsumed by official agendas.

**The role of this analysis**

As stated previously, the analysis I am presenting in this study is not intended to be deterministic or to convey a sense of hopelessness about the scope for achieving change in VET. I set out to make visible the social relations that work within VET and how those social relations organise the lives of people in local sites (Smith, D.E. 1993, p.188). Throughout my study VET practitioners and participants alike have strongly criticised the language form typically used in Training Packages and have described this language actively excluding and marginalising individuals, groups and organisations.
Practitioner concerns are ‘written down’, but are they ‘taken up’?

seeking to engage with these texts. While informants expressed a range of views about how Training Packages come to be written in this language none had access to an analysis that explored the development of a particular Training Package. Colleagues who participated in the consultations conducted as part of the review of the Training Package for Assessment and Workplace Training and the development of the Training and Assessment Training Package express surprise when I talk about my analysis of the sequence of five texts presented in this chapter.

When a sequence of texts represents opposing sides in a conflict the official account may act as the authoritative version for readers who are not already committed to a position, but readers who are committed to an alternative view will not easily be drawn into accepting the official version (Smith, D.E. 1990b, pp.156-157). This may be the case with VET practitioners who encounter the Training and Assessment Training Package. Those who approach this text with no prior exposure to the development process may accept the language benchmark established within the text. Others who participated in the consultation to express their concern about the language may not be easily drawn into accepting the benchmark. Of these, some are likely to feel that they were given the opportunity to have their say and they may accept that their view did not prevail in the consultation process. Some may simply respond as one informant in my study:

‘I just have a laugh and move on. No, I think I’ve been working with them so long now I just go “Ah, that’s Training Packages”’. (Jessica)

The interview data from my study indicates that whether or not practitioners accept this language as an appropriate benchmark many will still struggle to understand and work with it. My analysis seeks to show practitioners that their sense of disjuncture points to wider social relations that are currently unchallenged.

Much is at stake here. The language form that has been set as the benchmark for language use across VET and beyond is one which has been widely acknowledged as excluding and marginalising many of those who seek to engage with the national VET system. Prior to the endorsement of the Training and Assessment Training Package the language form was widely used but skilled practitioners were able to circumvent it and
create spaces for meaningful learning for their participants. With the endorsement of this Training Package this excluding language form is now established as a benchmark that has regulatory status. As the 2001 review report noted, this is a ‘significant accessibility issue’ (NAWT 2001, p.44) but the VET system as it currently operates has proved incapable of addressing this issue in any way other than to entrench it.

Marie Campbell argued that ‘learning how their knowledge is undermined and replaced is an important preliminary feature for empowering people’ (Campbell 2003, pp.16-17). By making visible the way that concerns about language were reshaped and overridden in the process examined here my analysis provides knowledge that has potential to open up possibilities for VET practitioners to act (Campbell 1998, p.56). While the consensual language of consultation has the capacity to draw practitioners in and neutralise criticism it also offers opportunities for counter-hegemonic action. Gary Kinsman (1997) showed how community based AIDS groups were able to take advantage of government commitments to consensual language and processes:

Taking advantage of the rhetoric of “partnership,” and the government’s commitment to it, we were able to make advances when we had a clearly defined agenda and were able to seize the dynamic of the process of consultation. We made the most progress when we were united, well prepared and forceful. (Kinsman 1997, p.225)

For VET practitioners to play a role in challenging the hegemonic discourse of national consistency they need to be similarly united, well prepared, forceful and have a clearly defined agenda. They also need to be aware of how the social relations of VET currently operate to organise and reshape input that challenges fundamental issues. Under the regular cycle of Training Package reviews the review of the Training and Assessment Training Package should commence during 2006. This may provide an opportunity for informed practitioners to further pursue the issues that have been subsumed and overridden in the review and development processes explored in this chapter.

**Conclusion**

The previous two chapters revealed how local workplace practice and local learning and assessment practice are socially organised by national VET texts including Training Packages and the AQTF. The current chapter has examined a sequence of 5 texts to
Practitioner concerns are ‘written down’, but are they ‘taken up’?

reveal how the review and development of the Training Package qualifications for VET practitioners was itself socially organised by other VET texts including the policy statements and regulatory texts that connect VET policy to wider economic policy. The discussion has argued that the national qualifications for VET practitioners have been integral to achieving government policy since the establishment of the first national competency standards for trainers and assessors in the early years of the National Training Reform Agenda. Through these qualifications VET practitioners learn to read national VET texts and to align their practice to those texts in ways that achieve indefinite replicability and support the policy goal of national consistency.

The review of the *Training Package for Assessment and Workplace Training* and the development of the *Training and Assessment Training Package* presented a contradiction. The national regulatory texts that govern such processes required that the review and development process undertake wide consultations across the VET sector. But conducting such consultations in relation to this particular Training Package opened fundamental questions for debate by an informed audience. The question of particular interest to my study was the issue of language use. Concerns about the accessibility issues created by the use of an excluding language form in the Training Package for VET practitioners were consistently and clearly raised throughout the consultations and were documented in texts produced as part of the process. Analysis of the sequence of texts explored in this chapter revealed how these issues were reshaped and overridden by official responses.

This analysis revealed a major contradiction within the VET sector’s claim that decisions are based on wide consultation. Practitioners and RTOs working in local sites are aware of the contradictions inherent in the VET system and it is through their hidden work that such contradictions are resolved and the inherently unstable VET system takes on the appearance of working smoothly. But consultation processes that are aligned to existing conceptual frameworks and policy agendas leave little or no room for practitioners to raise these contradictions and inconsistencies in ways that can inform decision making and policy development. For VET practitioners to challenge hegemonic discourses and achieve grassroots change they must recognise and challenge the socially
Practitioner concerns are ‘written down’, but are they ‘taken up’?

organised processes that see local needs and concerns reshaped and subsumed by official agendas. This analysis seeks to play a role in that process, by developing a map to show practitioners how local practice and input to national decisions are connected to and organised by social processes that are not visible from local sites.

This concludes the separate analysis of the three themes from my problematic. The following chapter will draw these themes together in a new description of the ruling relations of VET.

Where the Public Safety Training Package says:

Proceed to fire

Someone working in the industry might say:

Go to the fire.

Figure 7: Training Package language and workplace vernacular: Extract from Unit PUAFIR203A ‘Respond to urban fire’
Chapter Nine: Interwoven threads: Describing the fabric of ruling in VET

Introduction

Dorothy Smith described institutional ethnography using the metaphor of taking up a piece of fabric and examining how the threads are laid down and the pile knotted into them (Smith, D.E. 1999b, pp.9-11). Adopting this metaphor I could say that the thesis to this point has explored particular threads that emerged in my study, and the present discussion will look at how these threads are woven and knotted together to produce a piece of the fabric of ruling in VET. The analysis to this point has used my disquiet about the language of Training Packages as an entry point to explicate how ruling VET texts shape and organise local workplace practice, learning and assessment practice and VET practitioner input to national decision making. Earlier chapters have discussed VET governance arrangements, policy development, the goal of national consistency, and professional divisions that exist between VET practitioners. They also explored Training Packages, the AQTF and the development of the qualifications for VET practitioners. The following discussion will revisit these various themes, drawing them together in a new description of the ruling relations of VET.

This chapter will argue that the history of the Australian VET sector is a story of the ongoing pursuit of hegemony through a regulatory framework aligned ever more closely to national government priorities. It is also a story of fundamental paradoxes and contradictions. National VET policy establishes contradictory goals and treats the inherent tensions that arise from those goals as unproblematic. The VET sector as an institutional form relies on the hidden work of practitioners to resolve these contradictions and tensions at the level of local practice, but it denies practitioners a voice in policy development and undermines their authority to use professional knowledge and skills in meeting local needs.

The analysis will reveal national consistency as a hegemonic discourse pursued through multiple levels of increasingly complex ruling texts. These texts shift the policing of and
legitimacy for local practice from those who enact that practice to those who hold formal power to make judgements about competence, compliance or consistency. These shifts are occurring at multiple levels that broadly correspond to the multiple levels of texts, and the institutional language of the texts is part of the shift. The regulatory provisions of VET texts such as Training Packages and the AQTF establish positions of power, and the complex language in which these texts are written establishes the interpretation of the texts and the achievement of authorised readings as a key moment in the exercise of power in VET. There are opportunities for practitioners to resist, but resistance is currently constrained because the connections between local practice and national agendas are not necessarily visible from local sites, and also because the professional divisions between VET practitioners prevent the unity that is necessary for resistance to be effective.

The chapter, and the thesis as a whole, draws to a close with a brief discussion of my use of institutional ethnography to make these connections visible. There is an urgent need for VET practitioners to overcome their divisions and challenge the operation of regulatory texts, the power relationships established by these texts, and the use of an institutional language form that compels many practitioners and participants to surrender authority for decisions about their own practice.

The discussion begins by examining the tensions between the contradictory policy goals of national consistency and local diversity.

**Policy tensions: ‘national consistency’ and ‘local diversity’**

Since the National Training Reform Agenda in the late 1980s the goal of national consistency in VET has been repeatedly affirmed with little or no discussion about the extent to which it is achievable, desirable or even what it might look like within an extraordinary diversity of states and territories, learning environments, industry and skill areas, organisation types, individuals and groups. Yet this undefined goal is consistently represented in VET texts as an unquestioned, and unquestionable, good.
Does national consistency in VET mean standardising local practice, ‘deciding the best way to do things and then ensuring that these methods are followed consistently’? (Jackson 2000, pp.5-6.). Apparently not. In consultations undertaken as part of the restructure of VET governance arrangements national, state and territory governments reaffirmed a commitment to ‘national consistency without losing the capacity for local diversity’ (DEST 2005a, p.1). These same consultations also proposed that a national review be undertaken of state and territory AQTF audits ‘with an emphasis on identifying any areas where States are applying the standards inconsistently’ (DEST 2005a, p.13). Local diversity, it would seem, is both acceptable and desirable but inconsistency is neither. Contradictory policy commitments and priorities such as these are expressed without any discussion of the apparent tensions within and between them. If a capacity for local diversity is to be maintained, then what form will the much sought after national consistency take? When does acceptable local diversity become unacceptable inconsistency?

The unresolved tensions created by such policy commitments are glossed over at government level but the contradictions and tensions they give rise to are highly visible at the level of local practice where practitioners must attempt to resolve them. VET policy shifts responsibility for resolving these tensions to practitioners in local sites. Paradoxically, the increasingly complex regulatory texts shift authority for determining local practice away from practitioners to external VET authorities.

Despite local contradictions the rhetoric of national consistency is difficult to oppose. Prior to the establishment of a national VET system it was not unusual for local employers or educational authorities to only recognise qualifications obtained through their own state or territory technical education system. An individual who obtained a qualification in one state, or even in one regional area, might be unable to use it in seeking employment in another location. The introduction of nationally recognised qualifications is one of the tangible benefits provided by the national system. Public funding that makes many national qualifications available at a heavily subsidised cost is another benefit. Such benefits are recognised by practitioners and participants alike, and it is difficult to argue against the system that makes them possible. In acknowledging
particular benefits to individuals, however, people can find themselves drawn into accepting a complex regulatory and compliance driven framework (Campbell 1998, p.66; Jackson, 1995, p.54). This framework is made up of multiple levels of increasingly complex ruling texts.

**Multiple levels of ruling texts**

Previous chapters examined the operation of Training Packages and the AQTF as ruling texts that are activated in local sites, making visible how these texts organise both workplace practice and learning and assessment practice. The following discussion will present a different view of the National Training Framework, taking a step back and placing these texts within their broader context. The analysis will reveal that the regulatory texts of the NTF are just one level of text based ruling within multiple levels of official texts that also include policy statements, funding agreements, legislation, and local texts developed by RTOs.

National reports and policy statements hold no formal regulatory authority, but they underpin the VET sector by asserting national government interests and positions. They establish the link between VET policy and national economic and labour market policies, and define the underlying conceptual and policy agendas for VET including the establishment of national consistency as a primary policy objective.

The next level of texts includes government funding agreements and legislation that give legislative authority to the national VET system. Texts at this level entrench national objectives and alter the constitutional division of powers by establishing governance arrangements that shift authority for an entire sector of education from state governments to the commonwealth government.

The regulatory texts of the National Training Framework operate within these governance arrangements. The Australian Qualifications Framework, Training Packages, and the AQTF are structured to ensure nationally consistent qualification levels, program content, and delivery and assessment standards. These texts are supported by a ‘maze-like array’ (DET Qld 2003, p.1) of procedural guidelines,
implementation frameworks and best practice case studies that provide officially sanctioned instructions on how to achieve authorised readings of the regulatory texts (for example, DET Qld 2003; DET WA 2005a; DETYA 2001; WADoT 2002a). The texts of the NTF, combined with the instructions for their use, establish a direct connection between local practice and national policy agendas.

The historical development of the NTF reveals an ongoing quest for national consistency through the establishment of increasingly complex regulatory requirements. The introduction of national competency standards in 1990 failed to achieve national consistency because locally developed accredited courses, while aligned to the national standards, were often quite different in content, structure and assessment. In 1996 Training Packages brought competency standards, assessment guidelines and qualification frameworks together in a single national text for each industry but widely different interpretations still did not provide national consistency at the local level. In 2001 the AQTF required RTOs to document their local procedures and practices, validate their materials in comparison with other assessors, and ensure that their staff were qualified within the VET regulatory framework. Different interpretations of the AQTF standards, combined with a market demand for low cost programs to obtain the Certificate IV in Assessment and Workplace Training certification, limited the capacity of the AQTF standards to ensure national consistency. The attention of national government once again shifted to other regulatory texts. In 2004 the Training and Assessment Training Package introduced VET practitioner qualifications that are more complex and more closely aligned to the goals of the VET regulatory framework. In 2005 states and territories are being audited against the AQTF standards for state and territory registering/course accrediting bodies to ‘determine what further steps should be taken to improve the national consistency of registration and audit’ (DEST 2005a, p.13). Since 1990 a succession of regulatory texts has been introduced in pursuit of the policy goal of national consistency. As each text failed to deliver in terms of the ideal of absolute compliance more complex texts were introduced and activated.

The final level of texts in the ruling relations of VET are the local texts developed by RTOs and VET practitioners to demonstrate compliance with regulatory requirements.
The direct connection between local practice and national policy agendas, established through regulatory texts, is achieved in the texts developed in local sites. In producing written accounts that describe their practice in terms required by the AQTF and Training Packages RTOs and practitioners must find ways of acting that align to national reporting requirements. Practices implemented in local sites are reshaped by and directed towards producing written accounts (Smith, D.E. 1990a, pp.93-100), formal audit processes then hold RTOs and practitioners accountable for the written accounts which they themselves have developed (McCoy 1998, p.487).

Of these multiple levels of texts, only local texts and those of the NTF are immediately visible to practitioners. It is only through an institutional ethnography analysis that the complex array of texts and the interplay between them becomes visible. This analysis brings government funding arrangements into view, revealing a particular feature of ruling within VET. Roxana Ng (1988), Gary Kinsman (1997), and Liza McCoy (1998) each explored the impact of arrangements entered into when individual agencies receive part or all of their funding from government sources. My study reveals that government funding arrangements in VET similarly operate to reshape and socially organise local practice, but that their impact extends well beyond those organisations that directly receive government funds.

The funding agreements entered into between national, state and territory governments establish the national VET system and give authority to a regulatory framework that impacts on all local RTOs regardless of whether an individual RTO itself receives any government funding. An organisation wishing to conduct learning and assessment activities that lead to national VET qualifications has no choice but to engage with the regulatory framework by becoming an RTO and demonstrating compliance with the AQTF. Where an individual RTO receives part or all of its funding directly from government sources, the individual funding arrangements introduce an additional level of text based ruling through extra reporting and compliance requirements. But these requirements are over and above a high level of text based regulation and control that operates entirely independently of individual RTO funding arrangements.
In the ongoing quest for national consistency through government regulation the documentary compliance requirements associated with direct government funding may point to a future benchmark for all RTOs. Will greater national scrutiny of state and territory audits support readings of the regulatory framework that empower VET practitioners to respond to local needs and create spaces for meaningful learning? Or will they enforce narrow and rule bound readings that position practitioners as functionaries within a compliance framework aligned to the establishment of national hegemony? While there is some indication of state training authorities encouraging RTOs to adopt broad readings of national texts, the history of VET would suggest that direct involvement by national authorities in defining the parameters for local readings would tend towards narrower readings and greater compliance.

**Shifting the policing of practice through the authority of VET texts**

Institutional ethnography argues that ruling in contemporary societies is achieved through objectified forms of knowledge represented in texts that coordinate local activities and provide for organisational action (McCoy 1998, pp.395-396; Ng 1988, p.22). In 20\textsuperscript{th} century capitalist societies text mediated social organisation has become ubiquitous as the ‘technology of ruling’ (Campbell 2003, p.16; Smith, D.E. 1990b, pp.209-224). My study reveals that ruling in VET is achieved through multiple levels of texts that act individually and together to organise local practice towards policy goals defined by national government agendas. Even before the introduction of Training Packages and the AQTF Nancy Jackson identified the regulatory potential of Australian approaches that were establishing ‘an elaborate, vertically integrated system of labour market management’ (Jackson 1993b, p.54). A succession of texts subsequently introduced has established an even more elaborate system that constructs knowledge in a textual mode and establishes objectified textual processes to replace judgements and decisions that would once have been based on subjective knowledge, expertise and prudent practice (Smith, D.E. 1990b, p.214). These texts act to shift the policing of and legitimacy for practice from those who enact that practice to those who have authority to judge it. This shift is happening on multiple levels that broadly correspond to the multiple levels of texts.
Chapters 6 and 7 explored two elements of my problematic. In explicating how local workplace practice is socially organised and shaped by external Training Package standards Chapter 6 revealed that the power to assess competence shifts the policing of local workplace practice from the individuals and sites involved in enacting that practice to VET practitioners and ultimately to AQTF auditors. In explicating how local learning and assessment practice is socially organised and shaped by the external AQTF standards Chapter 7 revealed a shift that is occurring on two levels. Authority for deciding how compliance will be achieved is held by nominated staff members who have direct access to the RTO chief executive. This shifts policing of learning and assessment practice within the RTO from practitioners to managers and administrators. The formal power of AQTF auditors to judge compliance then shifts policing from RTOs to external VET authorities. These shifts in the policing of practice extend further. In drawing attention to multiple levels of ruling texts the present chapter reveals that funding agreements, legislation and national audit of state and territory training authorities shift the policing of practices relating to the management of VET at a system level from state and territory governments to national government.

At each level the use of national texts to assess competent workplace performance, to audit compliant learning and assessment practice, and to audit consistent management of the VET system shifts policing from the local level to VET authorities. The regulatory authority of these texts creates positions of power; the institutional language of the texts is part of the shift in policing and is fundamental to the shift in legitimacy.

**Shifting the legitimacy for practice through the institutional language of VET texts**

This point brings the discussion full circle, returning to my study’s starting point in the language of VET texts. National texts such as Training Packages and the AQTF exist in material form as accounts of practice that transcend local sites. Dorothy Smith (1990b, pp.221-224) draws attention to the ‘interpretive moment’ in which a competent reader activates a text in a particular local setting. Interpretive practices are part of the sequence of social action that occurs as a text is activated. Ruling in VET is achieved through the sequences of social actions that occur as national texts are interpreted and activated in
particular local sites. As these texts are ‘unpacked’ they ‘suture’ local practice to national policy agendas (Smith, D.E. 1999a, p.74).

National VET texts written in institutional language are capable of being interpreted in many different ways including readings that support good educational practice. The interview data from this study reveals that when Training Packages and the AQTF are read broadly, and with reference to the local context in which they are being activated, they are capable of supporting practices that are responsive to local needs. When read narrowly, and without reference to local sites, they establish the regulatory requirements of the texts themselves as the primary reference point. These narrow readings are capable of reshaping local practice even to the extent of replacing appropriate practices with inappropriate ones that provide documentary evidence for compliance but exclude and marginalise local participants.

The institutional language of these texts is such that those whose practice is subject to judgement seek advice in determining authorised readings. The regulatory power of the texts is such that those who are recognised as having authority to provide this advice are those who occupy the positions of power defined within the text. Interview extracts presented throughout this thesis revealed assessors interpreting Training Package standards and participants seeking out and complying with these interpretations. They also revealed auditors interpreting the AQTF and practitioners and RTOs seeking out and complying with these interpretations. A similar process is underway at system level, with national VET authorities proposing a range of strategies that would allow them to establish interpretational precedents to guide state and territory training authorities in their management of regulatory texts.

This last example is noteworthy. In pursuing its agenda of national consistency the national government has not proposed changes to the regulatory texts themselves, but has instead proposed strategies that would enable it to exercise control over the interpretive moment. Within the text based National Training Framework asserting authority over the interpretive moment is an exercise in power. If practitioners interpret Training Package units of competency and then require participants to align their workplace practice to that interpretation in order to be assessed as competent the
Describing the fabric of ruling in VET

practitioners’ authority over the interpretive moment gives them power over local workplace practice. Similarly, if RTO managers, administrators, or auditors interpret the AQTF and then require practitioners to align their learning and assessment practice to that interpretation in order to be judged compliant, those with authority over the interpretive moment have power over learning and assessment practice. National government efforts to establish precedents that would define parameters for state and territory interpretation of the AQTF standards are attempts to claim authority over the interpretive moment and exercise power over management of the VET system at state and territory level.

When those who occupy positions of authority assert their own reading of national texts this assertion reinforces the shift in policing of local practice. To the extent that those who enact local practice seek out, accept, and align their practice to the readings achieved by others, legitimacy for local practice is also shifted from local sites to external authorities.

**Resisting the shifts and subverting hegemony**

Gary Kinsman (1997, p.235) argued that ‘[h]egemony is always actively accomplished, never self-securing. It must be continuously struggled for, won, and maintained. It is never total, never exclusive, and there are always possibilities for subversion and transformation’. If VET practitioners are to subvert and transform the establishment of hegemony they need to reject the shift in legitimacy and resist the shift in policing on the multiple levels at which these are occurring.

Part of this will involve practitioners recognising, and being willing to surrender, the level of authority that they exercise over the practice of their participants. The authority of the VET practitioner conducting workplace assessments is entrenched in both Training Packages and the AQTF and is widely accepted. Some informants in this study described using a collaborative approach, unpacking units of competency by working with participants or local workplace experts to agree what each unit ‘might look like’ in the local context. Even in this approach the text based authority of the assessor means that practitioners are negotiating from a position of strength relative to participants or
workplace experts. But achieving a reading that is informed both by the Training Package standard and by local workplace realities gives the local site more authority than it would have if the practitioner simply determined what each unit ‘means’ with no reference to or input from the workplace.

In interpreting the AQTF for application to local learning and assessment practice RTO managers, administrators and AQTF auditors operate from positions of strength relative to the practitioners whose practice is subject to audit. The interview data revealed that some practitioners exercise authority within their RTO to determine local procedures and practices, but others have so little input to this process that they are unaware that there is an interpretational role being played within their own organisation. Practitioners who are excluded from this process have lost their agency in the interpretive moment. If they are to assert authority over their own practice and reclaim the agency they have lost, then the role of the interpretive moment and the positions of power present within that moment need to be made visible.

The data revealed that some practitioners readily turn to VET texts and AQTF auditors seeking interpretations to guide decisions about their own local practice. If practitioners turn to authorised sources asking what the AQTF standards ‘mean’, in the sense of seeking an authoritative reading that applies to all local sites, they surrender what power they do have in the interpretive moment. Practitioners need instead to draw on a range of sources to inform their own decisions about what the standards ‘might look like’ when applied and adapted to their local practice. The interview data reveals that this is happening in some instances.

A number of practitioner informants described resisting and subverting hegemony in VET by adopting local counter hegemonic practices. Practitioners who are knowledgable readers of Training Packages and the AQTF and competent users of VET institutional language are able to use the interpretive moment to achieve readings that address local contradictions. It is possible to turn the abstract institutional language of VET back on itself in a subversive way. By achieving broad readings of the abstract texts some practitioners are able to develop highly innovative practices that respond to local needs; they then write up those practices using language and concepts drawn from
the regulatory texts themselves. Only ‘highly committed, skilled individuals’ (Mawer & Field 1995, p.5) are able to use the language of VET to their own advantage in this way. Knowledgable readers of VET texts who are ‘institutional mavericks’ (Djama and VET 1995, pp.33-34), able to work within restrictive administrative rules without being constrained by them, are likely to be the exception.

While such local resistance enables some individuals to defend practices that focus on the needs of their participants rather than text based compliance requirements, at best it leaves the regulatory framework unchallenged and it may even reinforce the status quo. Using the language of VET to write up counter hegemonic practice potentially provides the kind of ‘best practice’ examples that can be pointed to as evidence that the VET regulatory framework is not unduly restrictive, that it is capable of supporting such practice. This use of institutional language also relies on and reinforces the gatekeeping function of the language, with facility in the language of VET determining access to positions of authority. Through becoming skilled users of VET language and texts individual practitioners claim some local territory within which they are able to defend the use of their professional judgement. While these individuals may have little choice but to adopt such practices, in doing so they are unwittingly acting as agents of the national VET system (Campbell & Gregor 2002, p.22).

Local action on its own is not sufficient to challenge the hegemony imposed through the regulatory framework; action at VET system level is also required. The interpretive moment is a key point in the exercise of power within VET. Practitioners need to resist and actively challenge national government attempts to achieve national consistency through greater control over the interpretive moment. Practitioners also need to challenge the uncritical acceptance of an institutional language form that is so complex that it reinforces the authority of those who occupy positions of power and denies access to many who have a legitimate interest in the process but who are not knowledgeable readers of VET texts.

Some practitioners challenge dysfunctional aspects of the VET system by making them visible in their input to official VET consultation processes. Chapter 8 explored how VET practitioners are positioned in decision making and policy development within a
Describing the fabric of ruling in VET

regulatory framework that sees local practice connected to national policy agendas. The analysis revealed that practitioners recognise the contradictions inherent in the VET system but when they try to make these contradictions visible their input is reshaped and overridden through decision making processes that are aligned to national policy agendas rather than to local needs. VET consultation processes are not typically structured to respond effectively to local contradictions or to challenge fundamental aspects of the system. Contradictions that arise in local sites are not seen as indicative of tensions within the system itself but are dismissed as local anomalies. This response impedes practitioner attempts to make these issues visible in policy development and decision making.

While achieving change through processes aligned to national agendas is extremely difficult, there is little evidence of practitioners challenging VET policy outside these formal arrangements. The ongoing quest for national consistency, pursued through incremental increases in regulation and text based compliance, has largely gone unchallenged by practitioners and is accompanied by little or no public debate. This is in stark contrast to the public debate about a government decision to impose an outcomes based education (OBE) secondary school curriculum in Western Australia. Secondary school teachers have organised to resist OBE, and the public debate they have initiated is currently being played out on the front page of the major metropolitan newspaper (Hiatt 2005a, 2005b).

Community and professional groups are able to influence government decision making when they are ‘united, well prepared and forceful’ and they pursue a clearly defined agenda (Kinsman 1997, p.225). The alignment between national consultation processes and existing policy is one significant barrier impeding practitioner resistance to national hegemony in VET; the need for unity and an agreed agenda are in themselves also major barriers. The divisions between the various professional identities, qualifications and historical distinctions within the VET profession have been identified at several points throughout this thesis. These divisions are counterproductive in a regulatory environment that subjects all practitioners to increasingly restrictive compliance requirements. By defending separate professional identities practitioners have become
Describing the fabric of ruling in VET

complicit in their own marginalisation. The body of VET practitioners as a profession needs to participate in decision making processes, resisting the ongoing pursuit of hegemony imposed through the rhetoric of national consistency.

To readers who are not positioned within the Australian VET sector this may seem a logical proposition. At practitioner level within VET it is a novel, even controversial, idea. Practitioners working in different parts of VET ‘have constructed themselves as different from each other in a variety of ways, including having different purposes, values, outcomes, organisational norms and cultures’; practitioners working in some contexts are not even aware that they are part of the VET sector (Chappell 2003, p.26). The social organisation of practice through the ruling relations of VET is not visible from local sites, and significant differences in local practice tend to be seen as representing different professional approaches or organisational aberrations rather than different readings of standard national texts.

Practitioners working within readings that allow them some authority over their local practice are highly critical of the bureaucratic practices they see being adopted elsewhere. Practitioners working within highly structured quality systems are similarly critical of less structured approaches, which they see as being profit driven and lacking in substance. These divisions run deep. ‘Teacher’ and ‘trainer’ are two widely adopted identity terms, but used outside the context in which each is adopted they are often perceived as pejorative. To practitioners who identify strongly as ‘teachers’ the term ‘trainer’ is seen as implying a lack of educational understanding and professionalism. To those who identify strongly as ‘trainers’ the term ‘teacher’ is seen as implying a range of undesirable practices reflecting particular teacher / student power relationships. The data reveals that practitioners who identify strongly with their preferred professional identity actively resist being associated with other identities which they see as being less professional. These divisions are reflected in the absence of a professional association or industrial union that identifies its intended membership as incorporating all VET practitioner roles and contexts. For practitioners who work across the diversity of VET, networking with professional colleagues means participating in a number of different professional associations and groups.
If practitioners are to begin building an identity as one profession the hidden role of government regulation in VET must be made visible. This study has revealed how the complex interplay of multiple levels of ruling texts reshapes and organises local practice in all contexts across VET. Despite their divisions VET practitioners do have much in common. Practitioner informants in this study expressed a shared desire to use their professional judgement in responding to local needs and creating spaces for meaningful learning. The relative freedom currently exercised by some VET practitioners is put at risk by national government attempts to take control of the interpretive moment through defining more restrictive parameters for interpreting the regulatory texts of the NTF. It is in the interests of the profession as a whole to challenge increasingly complex regulation that has potential to position all VET practitioners as functionaries and not as educational professionals.

**Institutional ethnography: Making the connections visible**

This study began in a sense of disquiet about the language of Training Packages, and in the early stages it was largely focused on how this language acts as a barrier to people understanding Training Packages and other VET texts. I set out with an issue to explore while developing a theoretical framework with which to explore it. Exploring issues of language and power, I quickly encountered an expectation that I would approach my study using an approach from the field generally referred to as postmodernism or post-structuralism and that my research methods would of necessity feature textual analysis or critical discourse analysis. I spent much of the first year of my project exploring these approaches and trying to find a way to apply them to my study.

Perhaps it was my own lack of understanding, but the more widely I read the less confident I became that these approaches would support the study I wanted to do. Training Packages are texts that construct local practice discursively, but as texts they are activated in real workplaces, by real people, doing real jobs. By real workplaces I mean workplaces like many I have worked in over the years – in work shirt, long khaki trousers and steel capped safety boots, setting up in the corner of a lunch room with my learning resources in a cardboard box under one arm and a portable whiteboard and tripod under the other. I wanted an approach that would let me explore the language of
Describing the fabric of ruling in VET

Training Packages from a position grounded in the reality of those workplaces. Many of the alternatives I initially explored offered highly theorised approaches. Dorothy Smith (1999b, p.99) argued that postmodernism and post-structuralism ‘posit language and discourse as having properties and dynamics independent of people’s intentions to mean and deny that categories and concepts can refer to and represent a reality beyond them, indeed, that it is meaningful to speak of a reality that is not in language’. The discrepancy between work practices as they are described in Training Packages and as they are carried out and described in real workplace sites was at the heart of my study. The approaches I initially explored seemed unable to let me focus on that discrepancy in the way I wanted to.

Similarly, critical discourse analysis or textual analysis of Training Packages as texts was an approach that did not seem to offer what I was seeking. To take a Training Package out of the local sites in which it is read, and analyse it using some form of abstract framework, would not address the discrepancy between the text and the local site. Such an approach would support an analysis of the language in abstract terms, and would provide useful information on that level. But it would not let me focus directly on the contrast between how a job role is described in a Training Package and how it is described by someone who performs that job role in a particular local workplace. The examples presented in text boxes throughout this thesis represent that direct comparison. The informants who provided these examples used many different approaches in translating their Training Package standard into workplace vernacular, ranging from complete rewrites to minor rephrasing of particular words. This wide variety points to the limitations of an analysis that investigates a text independently of the context in which it is activated.

Institutional ethnography allowed me to use my disquiet about the language of Training Packages as a starting point from which to explicate ruling in VET. My study brought into view fundamental questions about how ruling VET texts operate individually and in combination to organise and reshape local practice and align it to government agendas rather than to local needs. Returning to Dorothy Smith’s metaphor of taking up and examining a piece of fabric, when I looked closely at how the threads from my study are...
woven and knotted together levels of complexity emerged that were previously not visible. I saw how arrangements entered into at government level establish a regulatory framework which organises local practice, connects that practice to government policy agendas, and shifts authority from those who enact practice to those who have power to judge that practice. These are the power relationships that I could sense as a practitioner, but it was only through undertaking this study that they became visible.

In using institutional ethnography to explore the Australian VET sector I used an ‘emergent mode of inquiry’ (DeVault & McCoy 2001, p.752) to explicate an education context that is itself different and difficult to come to grips with (Casey 2002, p.5; Smith, E. & Keating 2003, p.2). Institutional ethnography has given my study a particular strength. It has enabled me to begin my research from the standpoint of a practitioner, gaining entry to local sites through interviews with individual VET practitioners whose talk expressed their own disquiets rather than authorised organisational positions. Studying the VET sector from the margins, rather than from established positions of power, allowed me to explicate the ruling relations that shape local sites (O’Neill 1998).

I view my study as contributing to the wider institutional ethnography project of conducting a range of studies in different contexts to piece together representations and analyses of institutional processes from different positions (Smith, D.E. 1999a, p.79). I have sought to develop what Dorothy Smith (1993, p.188) described as a map: ‘No map tells people how to move, but only how here and there are related on the ground should they want to get from one to the other. This kind of ordinary telling about the world we do for each other all the time’. My purpose is not to tell my colleagues what to change and how to change it. I am simply seeking to show VET practitioners how their practice is directly connected to social processes that are not visible from local sites, and how their attempts to achieve change have to date been unsuccessful.

Working as an ‘insider’ and exploring ‘how things work’ (Smith, D.E. 1990a, p.204), my study presents a very different way of looking at the Australian Vocational Education and Training sector. It brings into view relationships and connections that were not previously visible. More than that, it reveals that when research seeks to
produce knowledge ‘for’ VET practitioners and participants, rather than ‘of’ them
(DeVault 1999, p.47; Smith, D.E. 1987, p.153) the knowledge produced disrupts
comfortable assumptions about the capacity of the VET regulatory framework to ensure
good learning and assessment practice.

Language, power and ruling relations in VET

When I set out to challenge the use of an excluding language form in national Training
Packages my initial focus was on the language as a barrier to people engaging with
VET. Exploring this issue brought into view the hidden role being played by the VET
regulatory framework. Early in my study I realised that there were fundamental
questions at stake about the power relationships represented in the use of these ruling
texts, and simply rewriting Training Packages in more accessible language might make
them easier to read but it would not resolve the underlying issues.

As I explored these issues different threads emerged, relating to the use of Training
Packages to assess competent workplace practice, the use of the AQTF to audit
compliant learning and assessment practice, and the positioning of VET practitioners in
national decision making. I explored each of these threads in turn. When I came to the
final stage of my study, and looked at how the different threads I had explored were
woven together in the fabric of ruling in VET I found that I had come full circle. The
analysis revealed that the excluding language form I had set out to explore was indeed
part of the power relationships my study had brought into view. While rewriting
Training Packages in more accessible language will not, on its own, change the
underlying power relationships, challenging the use of this institutional language needs
to be one element of a wider strategy to challenge the power relationships themselves.

The National Training Framework has become ever more complex in the ongoing
pursuit of national consistency as an integral part of wider economic policy goals. The
complex institutional language in which the regulatory texts are written is such that
organisations and individuals whose practice is subject to judgement against the text
based standards seek out authorised readings. The regulatory power of the texts is such
that these authorised readings are provided by those who occupy positions of power
defined within the texts themselves. Combined, the institutional language and regulatory power of the texts establish the interpretive moment as a key moment in the exercise of power within VET. They establish positions of power that include some people and organisations while excluding others. Knowledgeable readers of these texts can achieve and defend their own interpretations; those who are not knowledgeable readers must surrender their authority to make decisions about their own practice.

There is an urgent need for VET practitioners to challenge the operation of these regulatory texts, the power relationships they establish, and the use of an excluding institutional language form. Research can play an important role in this process. Using institutional ethnography my study has defined the relationship between language and power in a way that is powerful for VET practitioners and can be generalised to other institutional contexts. The analysis presented in this thesis reveals opportunities for further institutional ethnography research within VET. Research questions arise relating to the empowerment and disempowerment of VET practitioners, and the concept of the VET professional within the context of the National Training Framework. Further research is also needed to explore the influence of different RTO institutional histories on the widely different readings of national regulatory texts. There are also opportunities for research focused on the contradictions that exist around the pressure for VET practitioners to be more or less autonomous knowledge workers aligned in their professional practice to the emerging knowledge economy of Australia, and the increasingly restrictive regulatory framework within which they operate.

My study has constructed the issues of language and power in VET through an understanding that makes visible how ruling texts constrain local practice and work to render education professionals as functionaries. Like Marjorie DeVault (1999, p.17), along the way I have learned that I can use my skills and knowledge to ‘stir up trouble’ and that ‘stirring up trouble felt like a very good thing to do’. The positive and enthusiastic response my study has received from people at all levels of the VET sector suggests that many of my professional colleagues in VET are also ready to start stirring up trouble by challenging dysfunctional aspects of the VET system and focusing back on local needs rather than national agendas.
### Abbreviations

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Full Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>ABS</td>
<td>Australian Bureau of Statistics</td>
</tr>
<tr>
<td>ACE</td>
<td>Adult and Community Education</td>
</tr>
<tr>
<td>ACTU/TDC</td>
<td>Australian Council of Trade Unions and Trade Development Council</td>
</tr>
<tr>
<td>ADTAC</td>
<td>Australian Disability Training Advisory Council</td>
</tr>
<tr>
<td>AITAC</td>
<td>Australian Indigenous Training Advisory Council</td>
</tr>
<tr>
<td>ANTA</td>
<td>Australian National Training Authority</td>
</tr>
<tr>
<td>AQF</td>
<td>Australian Qualifications Framework</td>
</tr>
<tr>
<td>AQFAB</td>
<td>Australian Qualifications Framework Advisory Board</td>
</tr>
<tr>
<td>AQTF</td>
<td>Australian Quality Training Framework</td>
</tr>
<tr>
<td>BSTA</td>
<td>Business Services Training Australia</td>
</tr>
<tr>
<td>CBT</td>
<td>Competency Based Training</td>
</tr>
<tr>
<td>CEO</td>
<td>Chief Executive Officer</td>
</tr>
<tr>
<td>DEST</td>
<td>Department of Education Science and Training</td>
</tr>
<tr>
<td>DETYA</td>
<td>Department of Education Training and Youth Affairs</td>
</tr>
<tr>
<td>FIFWA</td>
<td>Forest Industries Federation of Western Australia</td>
</tr>
<tr>
<td>ISC</td>
<td>Industry Skills Council</td>
</tr>
<tr>
<td>JAPSTC</td>
<td>Joint Australian Public Sector Training Council</td>
</tr>
<tr>
<td>LLN / LL&amp;N</td>
<td>Language, Literacy and Numeracy</td>
</tr>
<tr>
<td>Acronym</td>
<td>Description</td>
</tr>
<tr>
<td>---------</td>
<td>-------------</td>
</tr>
<tr>
<td>MINCO</td>
<td>Australian National Training Authority Ministerial Council</td>
</tr>
<tr>
<td>NAWT</td>
<td>National Assessors and Workplace Trainers Division of Business Services Training Australia</td>
</tr>
<tr>
<td>NCVER</td>
<td>National Centre for Vocational Education Research</td>
</tr>
<tr>
<td>NTF</td>
<td>National Training Framework</td>
</tr>
<tr>
<td>NTIS</td>
<td>National Training Information Service</td>
</tr>
<tr>
<td>NTQC</td>
<td>National Training Quality Council</td>
</tr>
<tr>
<td>NTRA</td>
<td>National Training Reform Agenda</td>
</tr>
<tr>
<td>QDET</td>
<td>Queensland Department of Employment and Training</td>
</tr>
<tr>
<td>RCC</td>
<td>Recognition of Current Competence</td>
</tr>
<tr>
<td>RPL</td>
<td>Recognition of Prior Learning</td>
</tr>
<tr>
<td>RTO</td>
<td>Registered Training Organisation</td>
</tr>
<tr>
<td>STA</td>
<td>State and Territory Training Authority</td>
</tr>
<tr>
<td>TAC</td>
<td>Training Accreditation Council of Western Australia</td>
</tr>
<tr>
<td>TAFE / Tafe</td>
<td>Technical and Further Education</td>
</tr>
<tr>
<td>VET</td>
<td>Vocational Education and Training</td>
</tr>
<tr>
<td>WADET</td>
<td>Western Australian Department of Education and Training</td>
</tr>
<tr>
<td>WADoT</td>
<td>Western Australian Department of Training</td>
</tr>
</tbody>
</table>
References

ABS – see Australian Bureau of Statistics


ACTU/TDC– see Australian Council of Trade Unions and Trade Development Council


ANTA – see Australian National Training Authority

AQFAB – see Australian Qualifications Framework Advisory Board

*AS04 Case Manager Skills Survey* 1994, Department of Employment, Education and Training, n.p..


Appendices


Appendices


BSTA – see Business Services Training Australia


Core Competencies Administrative Service Officers (ASO) 1-4 1992, Joint Australian Public Sector Training Council, n.p..


Appendices


Department of Education and Training Western Australia 2005c, ‘Professional Development 2005’, promotional brochure issued by VET Teaching and Learning, Government of Western Australia, Perth.


DEST – *see* Department of Education Science and Training

DET WA – *see* Department of Education and Training Western Australian

DET Qld – *see* Department of Employment and Training Queensland

DETYA – *see* Department of Education Training and Youth Affairs


FIFWA – see Forest Industries Federation of Western Australia


Grace, L. 2003, I’m sorry, I’ll read that again... Exploring the language of Training Packages, workshop conducted at Central TAFE 5th Annual Best Practice Teaching Forum: Passport to Learning, Perth, Western Australia, December 2003.


Grace, L. 2004b, It’s English Jim, but not as we know it..., professional development workshop conducted for the Australian Institute of Training and Development, Perth, Western Australia, July 2004.
Appendices


Jackson, N. 1993b, ‘If Competence is the Answer, What is the Question?’, *Australian and New Zealand Journal of Vocational Education Research*, vol. 1, no. 1, pp. 46-60.
Appendices


Jennings, V. 2004, Text analysis report on a unit of competency from the National Beauty Training Package, assignment submitted for 4161VTA Working Text, Griffith University, Queensland.


Appendices


NAWT – *see* National Assessors and Workplace Trainers Division of Business Services Training Australia

NCVER – *see* National Centre for Vocational Education Research


TAC – see Training Accreditation Council Western Australia


WADoT – see Western Australian Department of Training


Western Australian Department of Training 2002a, Guidelines for Competency Based Assessment in Vocational Education and Training in Western Australia, Department of Training, Government of Western Australia, Perth.
Appendices

Western Australian Department of Training 2002b, *Using Training Packages: From Training Package to Learning Program*, Department of Training, Government of Western Australia, Perth.
