

Vocational and Applied Learning Pathways Review

Victorian Government Response November 2020

SPELD Victoria Response to Key Recommendations (4/8/2021)

Introduction

SPELD Victoria is the peak body for Specific Learning Difficulties also referred to as Specific Learning Disorders or Disabilities (**SLD**) where individuals have been diagnosed. SLD by definition excludes intellectual disabilities.

Our vision is for Victoria to be a place where individuals achieve their full potential because those with learning difficulties and particularly Specific Learning Disorders (SLD) including Dyslexia, Dysgraphia and Dyscalculia are understood and supported.

It is within this context that we provide feedback on the Victorian Government's Response to the Vocational and Applied Learning Pathways Review.

Recommendation 1:

Lift the quality and consistency of vocational and applied learning for Victoria's students

Create a new specialist vocational pathway in the Victorian Certificate of Education (VCE) and transition over time to an integrated senior secondary certificate. This will create a high-quality, engaging offering that will see more young people stay in education, and provide highly visible and appropriate recognition of the value of vocational and applied learning, as well as helping to address the current negative perceptions of the VCAL

Response

- Creating a new specialist vocational pathway in VCE does not guarantee high quality or a more engaging offering that will result in more young people staying in education which in and of itself is an admirable goal. This will depend on significant investment of resources in upskilling staff, initial training of teachers and access to well-resourced courses both in school and out.
- Recently SPELD Victoria contributed to three submissions under our federated AUSPELD banner:
 - 1) Quality Initial Teacher Education Review (QITER);

2) Australian Curriculum Review: Feedback provided by AUSPELD on the proposed Australian Curriculum: English (F - 6)

3) Australian Curriculum Review: Feedback provided by AUSPELD on the proposed Australian Curriculum: Mathematics (F - 6)

- Much of the information and arguments made in these submissions are all highly relevant to this VCAL Review. As such, the AUSPELD submissions are integral to this SPELD Victoria response, and should be read as such. These are attached to this document as Appendices for convenience.
- Changing the current negative perceptions of the VCAL will like any cultural change effort take far more than simply rebranding the existing offerings of VCAL under the VCE brand. It will take effective leadership, significant investment and communication efforts sustained over an extended period of time to consolidate change.
- We note here that not all perceptions of VCAL are negative. Some parents value its distinct offerings, so retaining its strengths whilst radically improving its weaknesses seems to be the opportunity ahead.
- However, cultural change will not be effective if substantive investment in initial teacher training and upskilling of existing VCAL teachers is not implemented. This is most particularly relevant with regards to the teacher capabilities and content of the literacy and numeracy units. If investment is not made here, VCAA can expect no change to its variable outcomes and poor reputation amongst parents.
- The *OECD Skills Studies, Building Skills for All in Australia Report (2017)* states that one in five Australians – around three million adults – have low literacy and/or numeracy skills. Further, the Nationally agreed standard of functional literacy and numeracy, mapped to the Australian Core Skills Framework (ACSF) is Level 3.
- In the face of such high prevalence rates and declining achievements, now is the time to put in place a specific plan using evidence based best practice to improve Language, Literacy and Numeracy right across the entire education system including VCAL students as opposed to maintaining an offering at foundational or Level 1 or 2 of AQF for VCAL students. (*Foundation Pathways Certificate, Discussion Paper, page 2, and in the Firth Review page 30*).

- This is particularly relevant to students with SLDs. Excluding other issues such as school absence, if a student with SLDs is only operating at a foundational level in literacy and numeracy at the end of their school years, this is a poor reflection on the teaching and administration of students with SLD.
- As written, the proposed Foundation stream does not meet the minimum standards and is not an appropriate pathway for students with an SLD.
- Given the concerns raised by AUSPELD and other interested stakeholders in response to the recent draft of the Australian Curriculum (English and Mathematics), there is a justifiable concern around **what** specific content will be written into the new curriculum.
- (Please refer to the Appendix submissions for recommendations regarding approach to literacy and numeracy course content).

Create a new Foundation Pathways Certificate to provide a structured and recognised certificate to build the knowledge and skills of students who would benefit from specific support to prepare for the full senior secondary certificate.

- As written, this recommendation has an unfortunate underlying implication that all students who require specific support will be channelled into and accommodated through a new *Foundation Pathways Certificate* which may or may not lead to their preparation for the full senior secondary certificate.
- The Firth Report gives no specific data on the prevalence rate of students with SLDs in VCAL other than to say they are over-represented relative to VCE:
“VCAL students tend to be more disadvantaged across a range of measures than VCE students. Some groups—regional and remote students, students with a disability, students from low socio-economic families and Indigenous students—are all over-represented in VCAL enrolments.” (p272)

And:

“VCAL students tend to, on average, record lower academic achievement” and in 2019 “64 per cent of the students enrolled in VCAL had a reading or numeracy score in the lower two NAPLAN bands or were exempted in their Year 9 NAPLAN, compared to under 18 per cent of the students enrolled in VCE”; and “35 per cent of the students enrolled in VCAL had both a reading and numeracy score in the lower two bands or were exempted in their Year 9 NAPLAN, compared to 5 per cent of the students enrolled in VCE”. (p272)

- The Firth Report lumps all students with all kinds of disabilities into one category as “*students requiring specific support*”; and it would appear that the Victorian Government has accepted this categorisation.

- SPELD Victoria rejects this categorisation and the implications that students with SLDs cannot expect appropriate adjustments and accommodations in order to access the VCE.
- In particular, it appears that both the Firth Review and the Government's response to it has conflated learning difficulties with SLDS and intellectual disabilities. They are not the same and require differentiated responses.
- An intellectual disability affects every aspect of how the brain learns and understands. Specific Learning Disabilities affect only a specific area of learning (reading, writing or mathematics).
- The VCAA webinar slides circulated at recent public webinars indicate that a new Foundation Pathways Certificate will apply to "*students who have learning delays due to: diagnosed and undiagnosed learning disorders.*" (Slide 8; and Discussion paper, page 2).
- There are significant problems with the use of this language.
- As noted in the introduction, by definition and according to the DSM-V diagnostic criteria, students with SLDs do not have an intellectual disability. Additionally, students with learning difficulties have the potential to achieve at age-appropriate levels once provided with programs that incorporate appropriate support and evidence-based instruction. The barrier for too many students is either the school is unable or unwilling to provide this.
[\(https://auspeld.org.au/product/understanding-language-difficulties-a-practical-guide/](https://auspeld.org.au/product/understanding-language-difficulties-a-practical-guide/)
- The solution to schools who are either unable or unwilling to provide appropriately for SLD students – is leadership and teacher training, and proper resourcing.
- Students with disabilities such as SLD's can achieve at standard (eg ACSF Level 3) with appropriate accommodations and as such should not be directed into the Foundation Pathway Certificate.
- There are students doing VCE who dream of a future that requires the VCE pathway and who require specific support and are entitled to it. For example, VCE students with diagnosed Specific Learning Disorders, are entitled to and currently usually do (but not always) receive accommodations under VCE in accordance with the Disability Discrimination Act and the Standards of Education.

- The question is **was** or **is** the intent of this recommendation in fact more along the lines of: “Create a new Foundation Pathways Certificate to provide a structured and recognised certificate to build the knowledge and skills of students who are attracted to more practical applied learning options **and** who would benefit from specific support to prepare for the full senior secondary certificate”?
- In other words, students with diagnosed Specific Learning Disorders (or Disabilities) should be and are entitled to be accommodated under both VCE and VCAL and they should not be streamed according to whether they do or do not have a SLD. With the proposed alternatives to VCAL, students should be able to make choices based on their interests and aspirations.
- We are confident that the proposed vocational specialisation stream provides appropriate options and pathways for students with Specific Learning Difficulties to meet the ACSF levels (3-4) so they are adequately prepared for their preferred vocational pathways.
- However, how are students with *undiagnosed* learning difficulties to be accommodated under the FCP and revised VCAL any better than VCE? Making the content easier, does not enable students with SLD to fulfil their learning potential. Currently both education pathways systematically fail too many students with learning difficulties simply through a lack of diagnosis, appropriate intervention, skilled teaching and barriers to accommodations that will enable their learning pathways.
- This raises for us questions around the proposed explicit content of the Units planned for the FCP in Literacy and Numeracy. The recommendations detailed in the AUSPELD National Curriculum Review (English and Mathematics), although written for Foundation to Year 6 students remain relevant to the proposed curriculum design for students embarking upon the proposed FCP.
- Both the Firth Review and the Victorian Government Response highlight the need for a new Foundation Certificate pathway. The Firth Review states that *‘the primary use of the current Foundational VCAL has three primary uses: A completion certificate for students with disabilities and additional needs, for students reengaging with education and as a pre-vocational program for students in Year 9-10’* (p. 103)
- Such a statement does not acknowledge the learning potential of students with SLD’s who by definition must have an average or above average level of intelligence.

- With respect to initial teacher training, the Victorian context is encapsulated in the opening statement of the QITER Submission (Appendix), which notes “*that current initial teacher education does not (at worst) or does inconsistently (at best) currently prepare teachers with the knowledge and skills required for them to be able to provide high-quality, effective instruction in literacy and numeracy for all students, including those with language and learning difficulties or those from culturally and linguistically diverse backgrounds.*”

Ensure all students can access VET Delivered to Secondary Students (VDSS) courses that align with Victoria's growth sectors and local industry, including an explicit role for TAFEs in supporting universal access.

- Success will be totally dependent upon adequate resourcing and funding; and the recruitment of capable and skilled teachers no matter whether they come from VET; TAFE or other RTOs.
- SPELD Victoria supports this recommendation noting that access for all is enshrined in the Disability Standards for Education that is required of all Australian schools to:
 - ensure that students with disability are able to access and participate in education on the same basis as students without disability
 - make or provide 'reasonable adjustments' for students where necessary to enable their access and participation
 - provide reasonable adjustments in consultation with the student and/or their associates.
- Further, we note that as a signatory to the United Nations [Convention on the Rights of Persons with Disabilities](#) (CRPD) Article 24 (Inclusive Education) is consistent with the Victorian Government's new Inclusive Education policy which means that all children, including those with SLD's have a right to undertake VCE rather than be 'channelled' into the new applied learning pathway if they so choose.

Introduce minimum workplace hours for school-based trainees and minimum requirements for school-based apprenticeships and traineeships.

- Success will be totally dependent upon adequate resourcing and funding.

Provide more work-related opportunities for students through Victorian Government employers and government projects.

- Success will be totally dependent upon adequate resourcing and funding.
- In addition, greater transparency around student strengths and challenges will enable potential employers to collaborate successfully with the schools and allocate appropriate opportunities and resources.

Recommendation 2

More efficient delivery so all students can access vocational and applied learning

Manage collaboration and networks between school and non-school providers, Registered Training Organisations, employers and TAFEs to deliver vocational and applied learning.

- “*All students*” should include those students doing VCE if adequate resourcing and funding is applied to this.

Explore alternative delivery models, support access for students at isolated schools, better utilise existing infrastructure for vocational and applied learning, and share leading practice between schools

- We support the exploration of further delivery models particularly as COVID-19 has demonstrated the widening gap between advantaged and disadvantaged students across all sectors.

3. Stronger support to schools, reinforced by stronger accountability for delivery

Increase support for schools with administration, professional learning for teachers and school leaders, and up-to-date equipment.

- Although concerns expressed by teachers, parents/carers and employers about the current standard of literacy and numeracy in the VCAL appear to have been heard with mention for more PD opportunities for teachers, there is no clear outline of how this will be addressed or achieved.

- Please refer to the Appendix documents for specifics to support this recommendation to improve training for teachers, school leadership and supporting roles.
- SPELD Victoria provides a range of courses for teachers and other professionals to improve knowledge and understanding of SLD.

Reduce the complexity of existing funding arrangements and ensure funding considers the additional costs of VDSS delivery.

- Agreed.

Strengthen schools' accountability for providing appropriate pathways for all students

- SPELD Victoria supports this recommendation. Currently there is a lack of clarity, consistency, expectations and accountability across various pathways.
- Some of the issues that are relayed to us from parents continue to demonstrate that Victoria's education system currently delivers variably across the State. Better preparation of teachers in how to accommodate SLDs will reduce the incidents where students with diagnosed SLDs continue to be channelled into inappropriate pathways that reduce their future options, simply because the teachers in the VCE stream are ill-equipped to deal with accommodating a SLD.
- We acknowledge here the work being undertaken to implement the new Inclusion Education policy and recommend that this be expanded to incorporate the current VCAL sector.

Approach to Implementation

1. Supporting schools to deliver improved vocational and applied learning pathways for students, by:

- funding Jobs, Skills and Pathways Coordinators in Victorian government secondary schools to provide practical support for planning and administration of vocational and applied learning pathways.
- Dedicated Jobs, Skills and Pathways Coordinators (preferably with teacher training) may provide great benefit for students as they contemplate their future learning pathways.

- However, for students with SLDs, unless these Coordinators have participated in mandated foundational training in SLDs, our sector students will once again be misunderstood and potentially guided into inappropriate pathways.
- So an investment in training for schools and professionals responsible for guiding student decision making is essential. Otherwise, nothing will change.
- **creating Jobs, Skills and Pathways Managers in DET Areas to provide tailored support to government schools in the delivery of vocational and applied learning pathways.**
- As above these Managers need to have the requisite training and an understanding and knowledge of SLDs.
- **improving the collection and reporting of data about post-school outcomes so we can better assess how well we are supporting students.**
- We support the improvement of the collection and reporting of data about post-school outcomes.
- However, in our view this needs to be supplemented with far better collection and reporting of data in the area of SLDs prior to the final years of VCE and VCAL.
- The lack of disaggregated data as previously noted in the Firth Review, contributes to a lack of appropriate intervention and action on the part of both diagnosed and undiagnosed students and applies equally in both VCE and VCAL pathways.

Other Consultation Questions from the Discussion Papers

SPELD Victoria Responses

3. How might students be best supported to complete a 2-year certificate?

- Knowledgeable Jobs, Skills Pathways Coordinators that mentor students across the 2-year certificate will provide important continuity and guidance along this learning journey.
- Inclusion of explicit organisational skills (perhaps through the Personal Development and Work-Related Skills Unit) will provide critical scaffolding for student learning across all subject areas and workplace skills. PL training for staff on Executive Functioning would assist here.

4. What are the benefits and risks of a 16-unit certificate structure?

- Depending on the actual content of the various units, there is potential benefit from a 16-unit structure, as it allows for better scaffolding of student learning along a continuum.
- There are no inherent risks with a 16-unit structure per se, other than, if there is no identification, diagnosis and intervention for students with SLD, then these students will be no better served than they are currently in VCE, and consequently may not reach their learning potential.

8. What forms of assessment will best support student learning and not be a barrier to participation?

- Different kinds of formative assessments are a useful way for teachers to track student progress and are not a barrier to participation - unless in the case of students with SLD, the appropriate accommodations (including assistive technology solutions) are not in place.

12. What should be included in an enhanced Statement of Results?

- Clear and observable actions of what the student is able to do. Doing so will provide transparency for the student, education providers, the community and potential employers with a focus on student strengths.

14. What should the certificate be called?

- a) **Victorian Certificate of Pathways (VCP)**
- b) **Victorian Certificate of Attainment (VCA)**
- c) **Victorian Pathways Certificate (VPC)**

- Our preference would be for a Victorian Certificate of Attainment which has a more positive framing.
- We would certainly advise against using the nomenclature of **Foundation** Pathways Certificate because from a Parent perspective – Foundation is what their children did prior to Year 1. The notion that their child would graduate from school at Foundation level does not contribute to changing the negative perception of VCAL identified in the Firth Report.

Enquiries regarding this submission can be directed to:

SPELD Vic Education Team

E: learn@speldvic.org.au

T: (03) 9480 4422