

Submission from:

Inclusion Melbourne Inc
TOID: 6406
67 Sutherland Road
Armadale VIC 3141

24 June 2011

We thank you for the opportunity to provide a submission to the Essential Services Commission: Vocational Education and Training Fee and Funding Review 2011

About Inclusion Melbourne

Inclusion Melbourne is a not-for-profit organisation that provides services to people with an intellectual disability, helping them to create more enjoyable and rewarding lives and participate fully in the community.

Our vision at Inclusion Melbourne is for people with intellectual disability to live in an inclusive community, where everyone has the same opportunities to participate in community life and to take their place in society as respected citizens.

We believe our role, is to encourage and enable people with disabilities to achieve and maintain a valued quality of life. We achieve this by supporting people to create highly personalised and flexible lifestyles based on their needs and desires, and provision of education that support the inclusion of people into their local community.

Our response

Inclusion Melbourne welcomes Vocational Education and Training Fee and Funding Review. This submission has responded to only select questions from the issues paper and the selection of questions reflects what is most pertinent to our operations and cohort and was restricted by lack of time to prepare a full submission.

5.1 The Student Contact Hour funding model

How well does using the Student Contact Hour as the basis for funding achieve the objectives of the training system?

Funding levels must be adequate to enable learning environments appropriate for the development of skills to a level and within a timeframe that makes them useful to both students and industry. We believe that this requires flexibility for the creation of additional activities that integrate pathways to a more seamless transition from school through LLN and work readiness/transition to work related programs. For people with disabilities who seek to enter the workforce, funding that enables this pathway would have a significant impact in circumventing exclusion.

Currently, the Vocational Education and Training system is problematic when working with people with intellectual disability. In order for effective learning to take place class sizes must be small and contact between tutor and student needs to be of a high intensity. The current fee rate per hour does not reflect these restrictions in program design, nor does it enable for the provision of resources per hour for tutor preparation time. Therefore, an increase in the level of fees would enable flexibility in classroom delivery modelling so as to better meet the needs of students and industry.

Would use of an outcomes based measure better achieve the objectives? If so, what outcomes are important and what measures would be appropriate? What would be the implications of adopting an outcome based approach?

Inclusion Melbourne continue to face the issue that the model of delivery and class size necessary for us to achieve appropriate learning outcomes for students and industry is not reflected in SCH funding. Being funded for the fixed cost of operating a class may well address some of these issues. Funding on successful completion for the disability sector would be counterproductive and not recommended.

What factors may influence student completion rates and other outcome based measures?

The timeframe for people with disabilities and the resources required for them to successfully complete a course of study is complex and intensive and does not reflect the simple student contact model. People with an intellectual disability require additional time to complete a course, alongside specialised instruction to do so. It is important to realise that they may also have greater difficulty attending to intellectual tasks for long periods of time, requiring many short breaks to support their learning. People living on the disability support pension, and requiring attendant care support are also extremely unlikely to be able to afford to attend vocational education for more than one day per week. These people also often require intensive reinforcement of their learning by significant support people in their lives. These support people also require assistance to provide adequate and effective support. This is not currently funded.

How well does the current funding mechanism align with the principles outlined in section 2.3?

The funding model is not necessarily difficult to understand or use. However it does act as a disincentive to providers to offer the depth and scope of learning support required for people with disabilities to take them the next step from foundation education into vocational training.

It is also important to note that for many people with intellectual disabilities connection to life long learning is most accessible to learners through pre-accredited programs, this is a good reason to lift the cap on pre-accredited ACFE funding...this should be seen as an area to grow not to restrict.

What incentives may be created by the interaction of school and higher education funding with VET sector funding?

It would make sense to resource students who are in VET at the same level as they would if they were in school. If school funding for students were transferred to an ACE provider it would offer a more seamless transition for the student as there would be comparable funding to service their education needs and maintain a high level of intensity, as well as sense of achievement and enthusiasm. This would truly reflect transition from school to work as opposed to transition from school to RTO to work.

5.2 Base hourly funding rates

Effectively training people with disabilities as an ACE provider RTO is very expensive. This is due to the nature of effective delivery strategies requiring small class sizes and intensive 1 on 1 resourcing. This is compounded by the increased burden of compliance and the inability to recompense tutors for the extra time they need to spend on preparing programs, compliance, validation and moderation as well as professional development, all of which add to the expense.

Many of our students have struggled in the TAFE system and return to our programs. We provide a more flexible, intensive and personal model that makes it more likely that our students will stay engaged with their studies. This is a sector issue as much as a student issue, as the students with

disability that we support are systemically and financially excluded from the TAFE system, resulting in them not having a choice. Therefore, we believe that the provision of effective and sustainable programs would be benefited by parity of rates and some consideration to fees reflecting the nature of the sector providers operate in.

Is a higher base rate an appropriate way of reflecting any differences in the range of services provided? What other mechanisms could be used?

If you provide a range of courses rather than specialise in 1 or 2 qualifications does this add to your costs and should an increased rate be applied to cover these costs e.g. compliance, maintaining scope etc?

Is the funding model the best way of funding the Adult, Community and Further Education sector? If not, what are the advantages and disadvantages of alternative funding models?

The current model does not meet our needs. The financial burden of compliance is too great for a small RTO servicing a high needs target group like people with disabilities that is limited in its capacity (and desire) to diversify and create other income streams through opening up other markets. We believe that there could be a minimum administration and compliance funding component to help cover this component.

The current model does not recognise the additional costs, the loss of fee income that comes with working with high numbers of disabled learners. A flat rate for the cost of delivering a course rather than a scheduled rate would address the issue of having to offer small class sizes that require intensive tutor support for a cohort with limited ability to self fund any gaps.

What process and information should be used to determine the base funding rates?

The proportion of disadvantaged learners needs to be part of the information used to determine funding levels, and a higher rate should be paid for higher needs learners.

5.3 The weighted training hour model

To what extent do the current sector and cohort weightings help achieve the objectives of the Victorian Training System?

It is our experience that learners with high levels of disadvantage do not have their learning support requirements adequately costed. The WTH system may in essence be 'student centred' but the perceived base level delivery costs of programs have a breakeven point and this is dependent on the number of students in a classroom or program and the resources required. Therefore, small provider developing niche solutions for a disadvantaged group, such as Inclusion Melbourne in providing accessible programs to people with complex needs, are placed at a disadvantage.

What process and information should be used to determine the weightings?

The WTH system must consider items that may well create exclusion from programs due to inability of providers and learners to bear the high delivery cost of literacy and numeracy programs for people with intellectual disabilities and complex issues.

Should the funding model take into account the different costs incurred by different providers in delivering the same course (for example, regional providers) or through different delivery modes (for example, off campus)? What impact might such differentiation have on provider incentives?

This issue underlines the concerns of small community based providers like Inclusion Melbourne because we are limited in the modes of delivery that are effective in training our cohort and bear a high cost of covering personal care and learning needs of our students.

5.4 Higher-need learners

How well do the current funding and fee arrangements cater for higher-need learners? If not, how could the funding mechanism be improved? In answering this question, please identify who we should regard as a 'higher-need learner'?

Inclusion Melbourne views people with cognitive impairment as having additional needs that require specialised responses to support successful learning outcomes.

There is undoubtedly a higher cost involved in delivering to this cohort. This cost includes the environment you need to create, the resources you need to use, the ancillary support to ensure effective learning such as 1 on 1 volunteer tutors and home tutoring and the training of trainers often in areas of DHS compliance.

We believe that there needs to be recognition of the nature of programs and resourcing required delivering to this cohort and the funding arrangements need to reflect this. It may result in a different model or matrix of funding but it needs to enable the activities to run as they should to meet the needs of the learners and achieve the objectives of the programs

5.5 Thin markets

What evidence exists that thin markets are a problem?

Our submission is keen to seek support for a delivery structure that allows us to respond to these requests. We live with 'thin markets' because our class sizes are limited to ensure effective delivery but this then necessitates a thin support structure that does not allow for 'quick' response times to market/industry requests.

Is it important to ensure that thin markets are catered for? If so, who should be responsible — government, providers or industry?

It is critical that people with intellectual disabilities have their education needs met effectively and adequately. Their life chances and ability for inclusion in their communities are enhanced through having functional interpersonal, language and literacy capacity (like everyone else). We believe that Government should be responsible for addressing this area of need, as this cohort has the potential to fully participate in social life given the right support, skills and opportunities.

3.1 The Victorian Training Guarantee

What evidence is there of the impact that the eligibility criteria for access to a government subsidised training place have on a student's decision to enrol in, and complete, training?

The restriction of eligibility to age and level of study impacts greatly on our cohort. It is crucial for people with Intellectual disabilities to stay connected to learning for reinforcement and retention of their learning. There should not be a cap reintroduced and it would be very beneficial in our sector for non-certificate /diploma programs such as First Aid, Manual handling etc to attract a subsidy.

Does the Victorian Training Guarantee provide effective access to students who need to develop literacy, numeracy and language skills to participate in the workforce? Is the specified list of courses within the Foundation category appropriate?

Because the needs of adults with intellectual disabilities and mental illness are ongoing and complex their participation is limited by the systemic factors; age and course level restrictions definitely feature as does the continued lack of flexibility of courses and pathways.

Tuition fees

Foundation and work preparation courses should be funded in line with general secondary education due to the generic nature and the preparatory function of the education. The capacity of people with disabilities to pay fees is incredibly limited as most remain on fixed incomes with limited opportunity to consistently earn income. Their work opportunities lie in volunteer work or part-time work.

Objectives of the Victorian Training System

How well do the current funding mechanisms and fee structures contribute to achieving the objectives of the Victorian Training System? In making this assessment how are you defining the achievement of the stated objectives?

The current system makes it difficult for people with intellectual disabilities to complete their qualifications and it makes it difficult for providers to this cohort to complete them due to the ongoing support and reinforcement that is required to maintain learning and competency.

As a provider we offer a niche product within a larger market that is currently not or inadequately servicing the needs of people with intellectual disabilities. It is our strong belief that Foundation level programs should be changed to allow for fewer subjects but more nominal hours to assist the incorporation of support and reinforcement for retention of knowledge and skills.

Volunteer and flexible work arrangements are important to the Australian Economy. Our cohort are keen to participate in the world of work in both paid and unpaid capacity and to do this they need base level skills and ongoing support. The system undervalues their needs and the nature of effective responses to address them and makes ongoing support impossible.

Are there other ways or mechanisms for achieving the objectives outside of fee and funding arrangements?

Undoubtedly flexibility around nominal hours and module end dates would be valuable for learners with intellectual disabilities, mental illness and complex needs. Further, we believe the system would be enhanced through a quality regime with a focus on skill development outcomes rather than administrative processes. The Skills Victoria system of auditing is not commensurate with our needs for ensuring continuous improvements for learners; rather it overlays a heavy burden on small not for profit providers seeking to direct resources to address learners needs.

Submission prepared by:

Maria Eliadis
Manager, Education and Training