

Audit Guide – Clause 1.1

1.1 The RTO's training and assessment strategies and practices, including the amount of training they provide, are consistent with the requirements of training packages and VET accredited courses and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.

What is this clause about:

You need to have a training and assessment strategy document that reflects how you deliver your training and assessment to your target cohort of learners. You might have different target cohorts such as enterprise clients and fee-for-service public courses. This would mean that the strategy you use to meet the needs of these different groups would vary and reflect the different approach in the delivery such as unit selection, mode of delivery, resourcing and duration.

A little (or a lot!) on Volume of Learning

There is a primary focus in the audit on determining if the course is of an acceptable training duration consistent with the AQF volume of learning ([click](#)). Where does volume of learning come from and what is its purpose? Clearly it comes from the AQF. It has been there in the AQF long before the current 2015 standards. It only came to prominence when it was used in these standards to place some requirement around the course duration. This was not a specified requirement in previous RTO standards. Some might say it was implied. I can tell you one thing, this was a source of auditor subjectivity, so bringing it into the current standards has at least put some clarity and objectivity around it (sort of).

The volume of learning is a dimension of the qualification's complexity. It is a guide to the notional duration of the qualification assuming that there are no factors that might otherwise reduce this duration. I personally support its introduction. I can see it is having a positive effect on the quality and structure of courses being delivered. I see RTOs now giving better consideration to the learning structure because, simply, they have to. Just to avoid the insertion of another link, I have summarised the allocated volume of learning below for our VET qualifications:

- Cert I - 600 - 1200 hours
- Cert II - 600 - 1200 hours
- Cert III - 1200 - 2400 hours
- Cert IV - 600 - 2400 hours
- Diploma - 1200 - 2400 hours
- Adv Diploma - 1800 - 2400 hours
- Grad Cert - 600 - 1200 hours

Audit Guide – Clause 1.1

- Grad Dip - 1200 - 2400 hours

Why is there a volume of learning range? Why do we say that a certificate III has a range of 1200 - 2400 hours? I find this is one of the most confused aspects of the volume of learning and there is no written guidance about this that I am aware of. The range is due to the different number of units of competency required in each qualification. For example, a Certificate III in Business requires 12 units, a Certificate III in Early Childhood requires 18 units, a Certificate III in Light Vehicle Mechanical Tech requires 36 units. So, same AQF level but vastly different expectation in respect to the volume of knowledge and skills required to be delivered. This is the reason for the range. It is not valid to say that the minimum volume of learning for all Cert III qualifications (as an example) is 1200 hours. It is not. As the number or units increase, so should your guideline for the target volume of learning. As an example, the target volume of learning for a Cert III with 18 units might be about 1500 hours, not 1200 hours which is more reflective of a volume for a Cert III with 10-12 units. This is a key factor to consider before anything else in establishing a qualifications target volume of learning.

There are push and pull factors to consider. When you consider the volume of learning, you need to approach it from both directions in terms of the factors that push it up and the factors which pull it down. I find that when I am doing an audit, the RTO will only state a total hours for the course. But what are those hours made up of? The hours are primarily comprised of the push factors which are the modes of learner engagement. These are things like classroom delivery and self-paced learning.

A very useful reference to understand what volume of learning consists of is ASQA's Users' guide to the Standards for VET Accredited Courses 2016 ([click](#)). I know it is about accredited courses, but have a read. I have been developing accredited courses for over a decade and defining the volume of learning has been front and center to that process for most of that time. This guide separates the consideration of the delivery hours and modes of learner engagement into those which are supervised and non-supervised. This is useful, as it prompts you to sub-categorise the modes of learner engagement into those which are supervised and non-supervised. The following descriptions of these have been adapted from the aforementioned guide:

- **Supervised hours** represent the supervised structured learning and assessment activity required to sufficiently address the content of each unit. Supervised hours are assigned to learning and assessment activities that are delivered via face-to-face or monitored online and/or structured distance education.
- **Unsupervised hours** represent activities that contribute to achieving the course outcomes that are not supervised by an RTO trainer or assessor. These may include activities such as non-supervised work experience, field placement, private study and/or assignment work.

So, instead of simply describing the volume as a single number of hours, I encourage clients to describe the modes of learner engagement (push factors) using these categories, such as the following example:

Audit Guide – Clause 1.1

Supervised hours

- Classroom Training = 182 hours based on 7 hours per fortnight over 26 fortnights
- Practical Skills Training = 70 hours based on 7 hours per month over 10 months
- Assessment in the workplace = 104 hours based on 4 hours per fortnight over 26 fortnightly visits

Non-supervised hours

- Self-paced study = 324 hours based on 6 hours per week over 54 weeks of study
- Work placement = 220 hours based on 6 hours per week over 54 weeks and less the 104 hours to conduct assessment in the workplace.
- Assessment Preparation = 216 hours based on 4 hours per week over 54 weeks

The total volume of learning for this course is therefore 1116 hours delivered over 54 weeks.

This example is actually a real course (Cert III - 18 units) that we have designed and which has successfully been through about 35 initial registration and addition to scope audits. I'm certainly not claiming it is as perfect and we will continue to evolve it, but it is a solid model for describing your volume of learning on the push side of the equation. You may be thinking; hang on, didn't we say that a Cert III with 18 units should have a volume of about 1500 hours? Keep that thought in mind.

Ok, what about those pull factors? Cause 1.2 identifies three things that serve to reduce the duration of training. This clause focuses on "each learner" but these factors are equally applicable at a cohort level that you may be designing a course for. ASQA do canvas this in their guide but it dances around the point and I don't see RTOs using this effectively to their advantage.

The three things that reduce the training duration are:

1. The existing skills, knowledge and the experience of the learner. So, let's say you have a target learner that are an existing worker or perhaps they have all completed a lower related qualification that had shared knowledge and skills with the qualification being developed? This means that it is likely these cohorts of learners have some existing skills and knowledge which should reduce the amount of learning required. This should reduce the expected volume of learning.
2. The mode of delivery. This refers to the mode or combination of modes used to deliver the intended training. It can also refer to the design structure of the course such as unit-by-unit, unit clustering or holistic delivery. If you deliver a course using multi modes such as part-time classroom combined with online learning and work placement as an example, then of-course this delivery model is highly efficient. There learner has greater access to learning where they

Audit Guide – Clause 1.1

benefit from both trainer facilitation and their own directed and self-directed study. It is reasonable to claim a reduced course duration based on this rationale. Equally, if you are using unit clustering in your course design (the grouping together of units for learning and assessment), this avoids the overlap of having to teach and assess the same thing on multiple occasions. This is highly efficient and should lead to significant reductions in the training duration.

3. The reduction in the number of units required to be delivered. This factor is very straight forward, if you can issue units through credit transfer or recognition of prior learning before the "training" commences, then this reduces the number of units needing to be delivered. As was explained earlier, the lower number of units, the lesser the expected volume of learning.

So, these are the factors that pull the required volume of learning down. The tricky part of considering the pull factors is establishing how much time to claim and how to explain this in the strategy. ASQA refer to this explanation as your rationale for the volume of learning. The following statement comes from the ASQA Factsheet – Amount of Training:

If your RTO is considering that its training and assessment strategy should specify a shorter timeframe than that defined in the AQF volume of learning, you will need to be able to identify and explain why there is a variation. Your training and assessment strategy may include a rationale explaining how, based on the previous skills and knowledge and needs of learners, a specific learner cohort.

In regards to our example above (Cert III with 18 units), the course was clustered with 18 units reduced to 7 clusters. This has a profound effect on reducing the required volume. I would estimate that the 1500 hours would be conservatively reduced to 1200 hours. We included a long rationale statement of which the following small section addressed the time saving through clustering:

It should be noted that some time efficiency in the delivery has been achieved through the mode of delivery using a clustered unit delivery model. This resulted in 18 units of competency being delivered in 7 unit clusters. In accordance with Clause 1.2 of the RTO Standards, this mode of delivery has led to a reduced course duration. The estimated 1500 hours of volume of learning is considered to be reduced to 1200 hours based on this mode of delivery. Clustering units of competency together according to their common work function, shared knowledge and skills means that these items can be trained and assessed more efficiently without unnecessary repetition.

In conclusion:

- Be sure to identify the target volume of learning based on how many units you have in your qualification.
- Be sure to clearly outline the delivery hours and modes of learner engagement (push factors) into their supervised and non-supervised components.
- Be sure to utilise the full kit bag of pull factors which you can validly point to as reducing the expected volume of learning.

Audit Guide – Clause 1.1	
<ul style="list-style-type: none"> Be sure to provide sufficient detail in your TAS that explains the rationale for your expected duration and any time savings. <p>Just on a quick closing point on volume of learning. In our experience, we have not experienced (generally) auditors being dogmatic with the volume of learning. I can point to many examples of courses we have presented (through the client) to ASQA where the volume of learning was significantly below what was required with little justification in regard to valid rationale. The common thing in all of these courses was the detailed course structure and the RTO being able to demonstrate that all of the required knowledge and skills had been covered with sufficient time allocated to skill development. This is an overriding factor. If your volume is not stupid low and your learning and assessment is compliant, then you should be OK. At least that is our experience.</p>	
<p>Evidence to prepare:</p> <p>Training and Assessment Strategy (current) for each item on the scope of registration. This must identify:</p> <ul style="list-style-type: none"> the target learner or cohort the mode of delivery entry requirements licensing or regulatory requirements language literacy and numeracy requirements the units of competency the planned duration and allocation of supervised and non-supervised time (detailed) rationale for the amount of training work placement arrangements if applicable the learning delivery methods and activities 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> your strategy is targeting a specific learner cohort and is tailored for their needs your selection of units of competency complies with the training package rules you can identify the specific learning and assessment activities align to each unit of competency or cluster and show how these are sequenced and structured in the course program your strategy complies with mandatory entry requirements, prerequisites and licensing requirements applicable to the training product being delivered you are delivering the training product in an acceptable duration that is consistent with the AQF volume of learning your strategy is consistent with the way your training is being delivered and <u>advertised</u> <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> Can you talk me through the way this course is delivered? Who is the target learner for this course and how has the course been adjusted to their needs? Do they have any pre-existing knowledge and skills?

Audit Guide – Clause 1.1	
<ul style="list-style-type: none"> – the assessment methods and tasks – the resources and equipment requirements – plan for evaluation and continuous improvement <p>A supporting training program or training schedule document (very important) that details the actual program of delivery including the planned learning and assessment activities and how these are sequenced and structured into the course.</p> <p>A detailed resource guide that identifies the physical and non-physical resources required to deliver the course. This should not be broad statements and is recommended to be quite detailed list of equipment and other resources needed for the delivery.</p> <p>A staff matrix document or equivalent (not compulsory but recommended) that identifies the nominated trainers and assessors used in the delivery of the course. This document should provide a summary of their qualifications, industry experience and recent professional development.</p> <p>Evidence of industry engagement that informed the course development (not compulsory but recommended). This should identify the industry representatives that were engaged with, the details of the meeting and the outcomes relevant to the course development.</p>	<ul style="list-style-type: none"> – What was the basis for your selection of elective units? – What are the pre-requisite or entry requirements for this course and how have you catered for them in the enrolment process? – Can you explain the design structure for the course and what was the reason for adopting this structure (i.e. unit by unit, clustered, holistic)? – What is the duration of the course and how have you determined that this is sufficient time to achieve all the specific requirements of each unit of competence? – The planned duration does not appear to be consistent with the recommended volume of learning. What is the rationale for the planned duration? – You have quite a large amount of time allocated to 'self-paced learning'. Do you have developed self-paced learning activities that learners complete during this time? – How will training sessions be delivered in this course? Can you talk me through the training delivery strategy? – How will assessment be conducted in the course? Can you talk me through how assessment methods will be applied and show any examples of these in the program? – Can you talk me through how the work placement is organised? I am particularly interested in how you will ensure that the work placement site is suitable and if the required resources are available. How will the learner be orientated and supervised?

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