



**Training Accreditation Council**  
WESTERN AUSTRALIA

May 2023

# **RTOs and Stakeholders Views on Credit**

Understanding the risks and impact

research|solutions

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## 1.0 Executive Summary

The Training Accreditation Council in Western Australia (TAC) has revised its position on the application of credit for superseded equivalent units of competency. TAC's position is at variance with the Australian Skills Quality Authority (ASQA) policy decision.

The purpose of this consultation was to seek the views of Registered Training Organisations (RTOs) and TAC stakeholders (training councils, peak bodies, industry regulators and education) on TAC's position on the provision of credit and explore the advantages, risks and impact of TAC's credit advice on equivalent units of competency that had been superseded twice or more.

### 1.1 The RTO survey

An online survey of RTOs was undertaken in March 2023, with an invitation sent to 260 contacts (representing 172 RTOs) to participate in the survey. A total of 53 responses were received from 52 RTOs (30% of all RTOs). Of those responding, 66% were private RTOs, and 21% were schools and TAFEs, 13% represented other types of RTOs. Two-thirds of RTOs were based in the metropolitan area and one-third in country areas, mainly in the South-West.

#### *The credit process*

Over three-quarters of RTOs responding to the credit consultation have a documented process for awarding credit for superseded equivalent units. However, the incidence of a documented process for awarding credit for most superseded units is significantly lower amongst small organisations with five or fewer employees.

Almost all RTOs:

- Awarded credit if the unit is equivalent and immediately superseded;
- Recorded the award of credit on the RTO student management system;
- Once mapped, if the unit is not considered to align, the RTO advised the student of options such as RPL;
- Where the student is enrolled, the RTO trains and assesses the gaps identified between the two units;
- Verifies the testamur with the awarding RTO.

The incidence of a prepared mapping process for all superseded units was low (19%), though almost half of these RTOs had a prepared mapping unit for at least some superseded equivalent units. For most of these, the mapping process only covered the immediately superseded equivalent unit.

Credit applications were generally determined by the trainer/assessor, specialist in the area or unit coordinator. However, in 40% of incidences, the responsibility for determining credit applications was an administration process determined at the time of application.

Few RTOs charged a fee when the student applies for credit; those who do are generally small RTOs with five or fewer employees. Further, almost no RTOs charged a mapping fee for students where the unit needs to be mapped against previous equivalent units.

In 2022, just under half of the RTOs (43%) had granted credit for an immediately superseded equivalent unit of competency. One in five RTOs (21%) had granted credit for a superseded equivalent unit of competency where the unit had been superseded twice or more.

The number of students in RTOs who had been granted credit for one immediately superseded equivalent unit of competency averaged 57; however, though there was a wide range of student numbers across RTOs. The average number of students granted credit for equivalent units of competency superseded twice or more was 13.

### *TAC's position and the advantages and risks of automatically granting credit*

The majority (72%) of RTOs participating in the consultation supported TAC's position on the award of credit for an equivalent unit of competency that has been superseded twice or more. The reasons for support of TAC's position on credit were diverse, with no reason for supporting this position suggested by more than a quarter of RTOs. The reasons\* included:

- Concerned about currency where the unit is superseded more than once. Units change over time, even if deemed equivalent, and people forget;
- The student is deemed competent against the most up-to-date qualification where units have already been deemed equivalent and immediately superseded;
- Due diligence in terms of mapping is required where the unit is superseded more than once to identify gaps/changes in industry best practices;
- It is a simpler, streamlined process for equivalent units to be immediately superseded.

The reasons\* for opposition to TAC's position:

- We need to acknowledge students' prior skills. If the student still has the same level of skills and knowledge, these should be recognised;
- There is a lack of consistency in determining equivalency; we need guidance here;
- Our RTO works with national employers, and their employees in WA are treated differently than those in other states.

RTOs perceive the main advantage of granting credit automatically where the equivalent unit has been superseded twice or more was a reduction in the RTOs' administrative and regulatory burden.

The greatest risks\* were perceived to be:

- The student's skills for that unit may not be current, and the student could graduate without having the skills and knowledge the industry requires (77% significant risk);
- A student can seek automatic credit for a unit from ten years ago, which may still be classified as equivalent (68% significant risk);
- If credit is granted automatically, there may be differences in the unit, and the RTOs reputation would then be compromised if it emerges that the student doesn't have the most up-to-date skills and workplace safety required to do the job (64% significant risk).

Most RTOs felt that no units within their scope of delivery had changed so significantly that they needed to be mapped to previous versions.

\*These are verbatim responses which have been grouped into similar themes.

### *Industry and employer advantages and risks*

RTOs believe that industry and employers perceive the automatic application of credit to be an easy, quick and cheap process that may enable the industry to address skill shortages quickly; however, RTOs felt that the industry and employers would be concerned that the students may not meet current industry requirements and that if the credit isn't automatically applied, students may need more training. Further, those additional training costs may be prohibitive for employers.

RTOs were also concerned that their reputation might be at risk in the eyes of the employer if the graduate didn't have the required skills and knowledge contained in the most recent version of the unit.

### *The impact on students*

The main positive benefit to students of automatic credit applications was a faster credit process and the ability to commence work in the industry more quickly (particularly in skill shortage areas). Other advantages identified by the majority of RTOs were that the student would not have to complete the gap training, would get the latest unit with no additional effort or cost or would not have to pay for gap training.

The main risks to students were that they might need help understanding current requirements in the industry, that it may result in job role gaps if an across the board credit approach is applied, and that the student may not be ready nor prepared for the workplace.

### *TAE qualifications*

TAE qualifications were delivered by only five RTOs responding to the survey, but for four of these, the impact of TAC's position on credit on trainers and assessors upgrading to the new TAE qualifications was significant.

The reasons for a significant impact given by three RTOs were:

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*TAEDEL UoC is one of the UoCs most common in CT applications.*

*The impact can be time consuming however it is essential to ensure the students are appropriately qualified to deliver the current TAE qualifications.*

*Some replaced TAE units require more individuals be included in the assessments which may be difficult for small organisations. Demonstration with 3 individuals to 8 individuals should be no different so an automatic credit would be beneficial and therefore a significant impact by not having to address the "gap" in assessment requirements.*

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### *Useful support resources*

The support resources that RTOs would find most useful are:

- Factsheets (87%)
- Webinars (79%)
- Users' Guides (68%)
- TAC Updates (66%)
- Workshops (53%).

The most frequently made comment about the delivery of credit was that TAC needed to take a more industry-specific approach rather than an across-the-board approach.

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*The risk is that credit rules are applied across the board when some industries are lot higher risk than others. Each application should be addressed on its merits.*

*Each industry is different, and an overall approach to credit transfers needs to be carefully applied.*

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## 1.2 Stakeholder views

TAC provided a list of its 25 key stakeholders including training councils, peak bodies, industry regulators and two respondents from the education sector. A total of 18 out of the 25 stakeholders were surveyed by telephone to explore their views on TAC's position in awarding credit to equivalent units that have been superseded twice or more.

### *Stakeholder understanding of credit*

The main ways in which stakeholders defined credit were:

- Credit is a way to recognise formal learning a student has previously achieved;
- The documentary evidence of a course completed should include:
  - the authenticated VET Testamur
  - the original statement of attainment
  - transcript of results
  - Certificate.
- The RTO granting the credit must verify the documents to ensure they are authentic;
- For credit to be granted, the RTO must seek evidence of the AQF<sup>1</sup> certification;
- Credit applies when the unit of competency is equivalent to the earlier version;
- Credit should only be granted after the equivalent unit of competency has been mapped to an earlier version.

Stakeholders generally disagree that:

- Credit should be granted for an older equivalent unit no matter how long ago the student achieved the original unit;
- Credit should be granted for an older equivalent unit no matter how many versions have been released in the intervening period since the student originally achieved it.

Stakeholders were evenly divided in their views on whether credit was an administrative process carried out by the RTO.

<sup>1</sup> For your reference, AQF is the Australian Qualifications Framework (AQF)

*The advantages and risks of automatically granting credit for superseded units where the unit has been superseded twice or more and not mapped.*

The majority of stakeholders (55%) felt that there were no advantages of granting credit automatically for superseded equivalent units of competency superseded twice or more and not mapped. While stakeholders mentioned a range of advantages for the automatic granting of credit, none received significant support.

The main risk identified by stakeholders is that the student may not meet current industry requirements; for example, they may not have current skills, knowledge, ability to operate relevant machinery or awareness of health and safety requirements. This risk was volunteered without prompting by the majority of stakeholders.

Other significant risks identified by stakeholders included that:

- The student may be at risk if the RTO does not ensure that the student has learnt or can do everything they need to be able to do for the qualification (89% significant risk);
- The student may be unable to meet regulatory or licensing requirements (83% significant risk);
- The student could be at greater risk of workplace accidents (83% significant risk).

Other risks included:

- There may be an employer or RTO culpability if the learner is certified without mapping and there is a workplace accident (67% significant risk);
- Industry and employer may not be certain that students meet current industry requirements, including skills, knowledge or workplace health and safety requirements (67% significant risk).

*TAE qualifications*

Most stakeholders (82%) were aware of the new TAE 40122 Certificate IV in Training and Assessment qualifications. Overall, 41% of stakeholders aware of these qualifications felt that TAC's position on credit would have a fairly significant or very significant impact on trainers and assessors upgrading to the new TAE qualification. Many of the remaining stakeholders felt unable to comment on the impact.

The reasons for the significant impact on trainers and assessors were:

- Some trainers and assessors were not qualified enough and may exit the industry when there is a critical shortage;
- The Standards for RTOs do not mandate trainers and assessors to upgrade to new qualifications;
- In the construction industry, the instructors are not academic, and would struggle with the assessment process and requirements.

*Useful support resources*

Stakeholders felt that the most useful support resources for themselves would be:

- Webinars (77%)
- Workshops (71%)
- Factsheets (65%)
- Users' guides (65%)
- TAC Update (59%).

Other comments made by stakeholders related to:

- The complexity of the issue;
- The need for greater clarification to identify at what point a unit was no longer equivalent;
- The need for leadership by TAC to bring consistency to the process so that everyone is on the same page.

## 2.0 Introduction

### 2.1 Background

Three regulators regulate the Vocational Education and Training (VET) sector in Australia - the Training Accreditation Council in Western Australia (TAC or the Council), the Victorian Registration and Qualifications Authority, and the Australian Skills Quality Authority (ASQA), which is the Commonwealth VET regulator and responsible for the remaining States and Territories.

The Council is established by the Vocational Education and Training Act 1996 (VET Act) and the Vocational Education and Training (General) Regulations 2009. The Regulations direct that the Council, in performing its functions, have regard to the Standards for VET Regulators 2015. The purpose of these Standards is to ensure the following:

- Integrity of nationally recognised training by regulating RTOs using a risk-based approach that is consistent, effective, proportional, responsive and transparent;
- Consistency in the VET regulator's implementation and interpretation of the *Standards for Registered Training Organisations RTO (2015)* (Standards for RTOs); and
- Accountability and transparency of VET Regulators in undertaking regulatory functions.

Since the Standards for RTOs came into operation, there has been a level of national consistency regarding regulator interpretation and advice on the requirements within the Standards for RTOs.

In September 2022, the Council endorsed a revised position on the application of credit for superseded equivalent units of competency.

- RTOs can award credit using the 'equivalent' determination where the unit of competency already attained by the learner immediately precedes the unit for which credit transfer will be awarded;
- Where an award of credit is sought for unit/s of competency that have been superseded twice or more (e.g. there is a unit interceding):
  - the RTO must conduct a mapping process to confirm no gaps exist in the training and assessment requirements between the unit already attained by the learner and the unit for which the learner seeks an award of credit; and
  - where a mapping process identifies gaps in the training and assessment requirements, no award of credit can be provided.

The decision:

- Supports RTOs granting credit;
- Reduces red tape by removing the requirement to map learning outcomes between a new unit and the immediately superseded equivalent unit; however, where credit is sought for a unit that has been superseded twice or more, pre-existing arrangements remain, i.e. RTOs need to establish the degree of similarity between the two units to ensure skills and knowledge (reflected in elements, performance criteria and assessment requirements) are well aligned.

The Council's decision on credit is not wholly aligned with the national VET Regulator's advice on credit published in June 2022, which does not mandate mapping the superseded units of competency twice or more but concedes best practice.

The Council requested further examination of the issues related to credit and this report details the consultation undertaken with RTOs and stakeholders on equivalent units of competency that have been superseded twice or more to understand the impact of TAC's credit advice.

## 2.2 Objectives

The objectives of the consultation undertaken with RTOs were to determine:

- If RTOs had a documented process for awarding credits for superseded equivalent units and the nature of the processes used;
- If the RTOs had a prepared mapping process for superseded equivalent units, how far back the mapping processes go and who is responsible for determining credit applications;
- If there is an application fee for the student when applying for credit and if there is a mapping fee where the unit needs to be mapped against previous units;
- How many students were granted credit, got immediate superseded units and for units superseded twice or more, and which were the most common units;
- The RTOs' support for TAC's position on credit and the perceived advantages and risks of granting credit automatically where the unit has been superseded twice or more;
- If there are any units, and which units have changed so significantly that they need to be mapped to previous versions;
- Industry and employers' perceptions, advantages and risks of automatic application of credit;
- The positive and negative impacts on students as the result of the automatic application of credit;
- The types of support resources which would be useful to RTOs; and
- The impact of TAC's position on trainers and assessors upgrading to the new TAE qualifications.

The objectives of the survey of TAC stakeholders were to:

- Explore the industry stakeholder's understanding of credit;
- Determine the advantages and risks of granting credit automatically for equivalent superseded units where the units have been superseded twice or more and not mapped to previous versions;
- Determine within each stakeholder industry or area of interest any equivalent units that have changed so significantly that the stakeholder feels that they need to be mapped by RTOs to previous versions and which are the most common units;
- Measure the impact that TAC's position on credit will have on trainers/assessors upgrading to the new TAE qualifications; and
- Determine which support resources would be useful to stakeholders.

## 2.3 The Approach

Research Solutions met with TAC in early March 2023 to discuss the consultation logistics and the information to be gathered.

Two questionnaires were developed - an online questionnaire for RTOs, and a telephone questionnaire to be administered to TAC stakeholders.

### 2.3.1 The RTO survey.

The RTO survey was reviewed by TAC and tested in the online environment to provide an understanding of the experience RTOs would have in completing the survey. The survey was programmed into Web Survey Creator, an Australian online platform that meets the requirements of the Privacy Act with the data stored in Australia.

TAC provided a list of 260 contacts (after bounce-backs and duplications had been removed) representing 172 organisations. Each contact was emailed in advance by TAC, informing them of the survey and encouraging them to participate.

The survey commenced on 2<sup>nd</sup> March and closed on 5<sup>th</sup> April. RTO contacts received a personalised individual invitation with a unique link and two reminder emails containing the link. A total of 53 responses were received to the survey representing 52 RTOs, or 30% of the RTOs on the list supplied, providing a forecasting error of  $\pm 11\%$  at the 95% level of confidence.

### 2.3.2 Stakeholder survey

The stakeholder survey was reviewed by TAC. TAC provided a list of 25 key stakeholders, emailing each in advance to inform them about the survey. Research Solutions briefed Market Research Australia in person and provided briefing notes to ensure that the questions were fully understood. Each stakeholder on the list was contacted more than five times to secure an interview, and 18 interviews were achieved. Two stakeholders preferred to discuss the issues with TAC directly, and five stakeholders could not be reached after numerous contacts, including contacting reception and their colleagues in the organisation.

#### *The analysis*

At the completion of the data collection period, the results of both surveys were downloaded into SPSS and then into Q for analysis purposes. The data was checked and thoroughly reviewed, taking into account the following:

- The time taken to complete the survey, indicating the level of thought which went into the survey;
- The comprehensiveness of the free text questions; and
- Any evidence of flatlining or giving the same answer to multiple questions, particularly those in a grid.

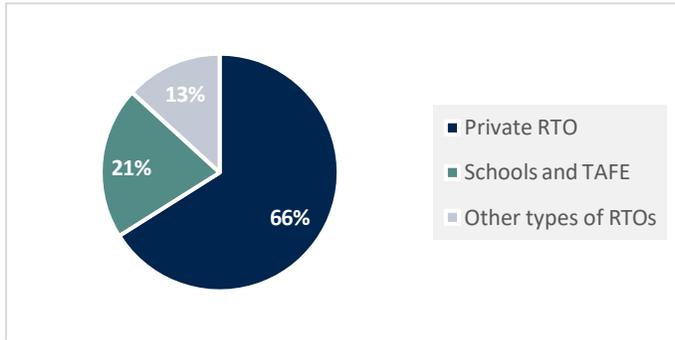
The distribution of responses for each question has been provided in this report as well as cross-analysis by RTO size, location (metropolitan or country areas), length of time in business and type of training provider. Where the groups' responses are statistically significantly different from those of other groups, the results have been reported.

The stakeholders have been predominantly analysed as a group, given the number of stakeholders responding to the consultation; however the type of stakeholder has also been considered to determine any real differences.

The survey results are illustrated in charts and tables, with free text questions grouped by content with verbatim quotations provided to illustrate the results.

## 2.4 RTOs participating in the consultation – a Profile

Figure 1: Organisation type

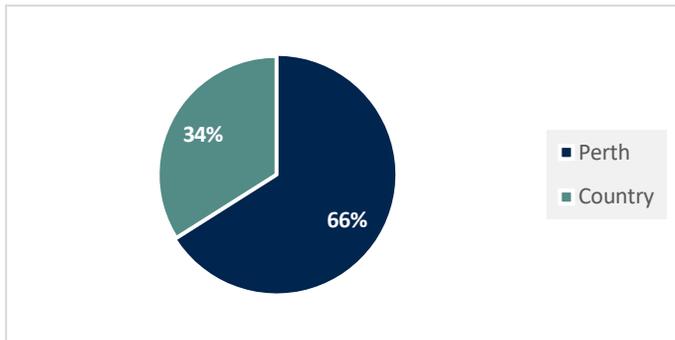


Other types included:

- Government enterprises
- Industry Associations
- Non-government enterprises
- Community based educator

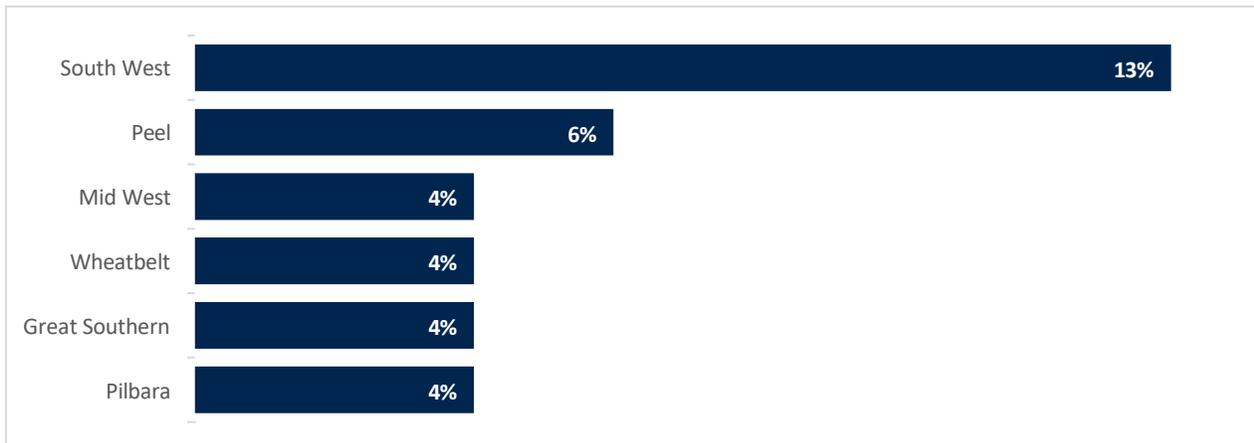
Sample size n=53

Figure 2: Head office region



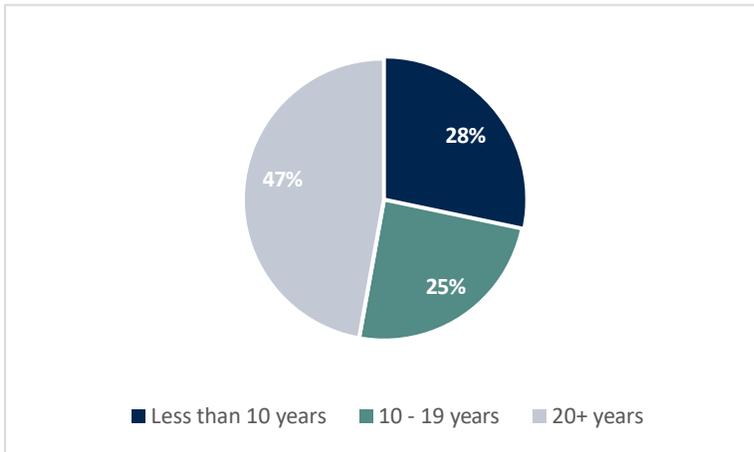
Sample size n=53

Figure 3: Country regions



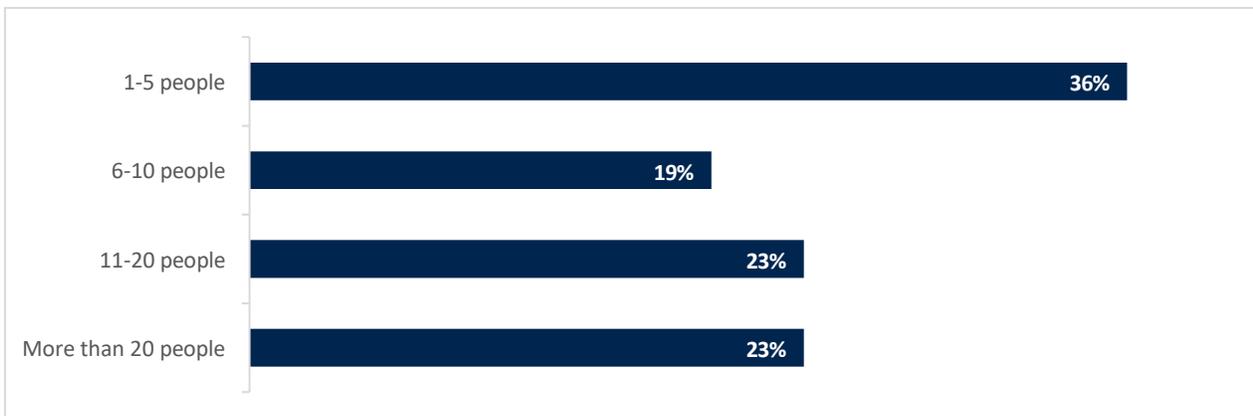
Sample size n=53

**Figure 4: Length of time in business**



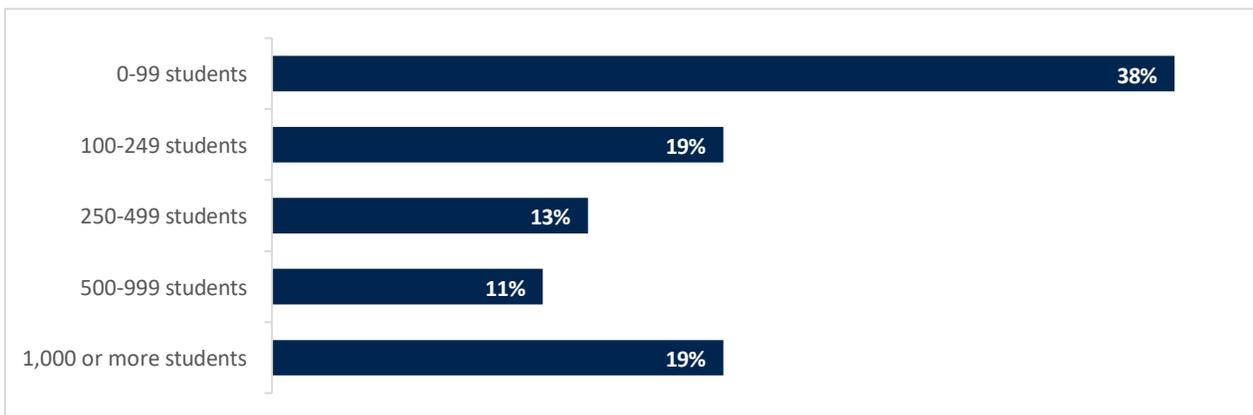
Sample size n=53

**Figure 5: Number of employees**



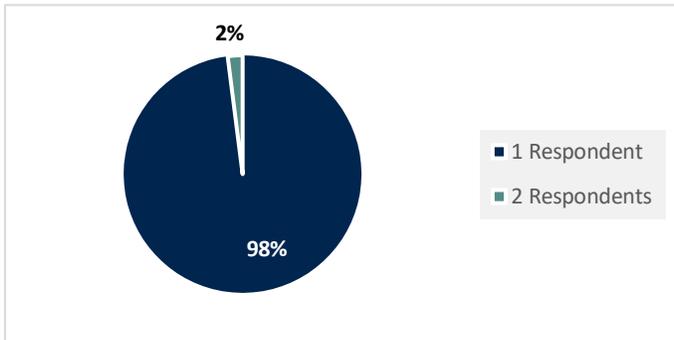
Q17 How many people does your RTO employ, including yourself? Sample size n=53

**Figure 6: Number of students enrolled.**



Q18. How many students did you enrol during the 12-month period from January 2022 to December 2022? Sample size n=53

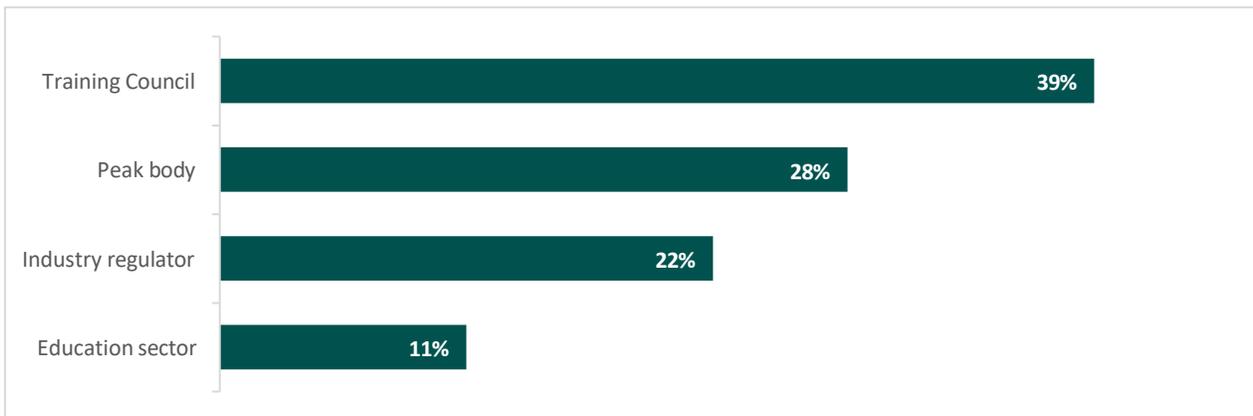
**Figure 7: The number of responses from each RTO**



Sample size n=53

## 2.5 Stakeholders participating in the consultation – A Profile

**Figure 8: Type of stakeholder**



Sample size n=18

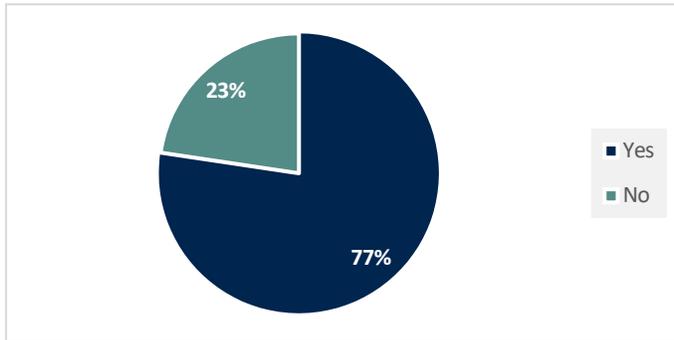


## **RTOs' views on credit for superseded equivalent units**

### 3.0 The Credit Process

Over three-quarters of RTOs responding to the credit consultation have a documented process for awarding credit for superseded equivalent units; this is similar by organisation type and amongst the metro and country-based RTOs, however, the incidence of a documented process for awarding credit for superseded units is significantly lower amongst small organisations with five or fewer employees.

**Figure 9: Document process for awarding credit**



Q1. Do you have a documented process for awarding credit for superseded equivalent units in your organisation? Sample size n=53

**Figure 10: The incidence of a documented process for awarding credit for superseded equivalent units:**

	1-5 people	6-10 people	11-20 people	More than 20 people	All respondents
Yes	58%	90%	92%	83%	77%
No	42%	10%	8%	17%	23%
Sample size	19	10	12	12	53

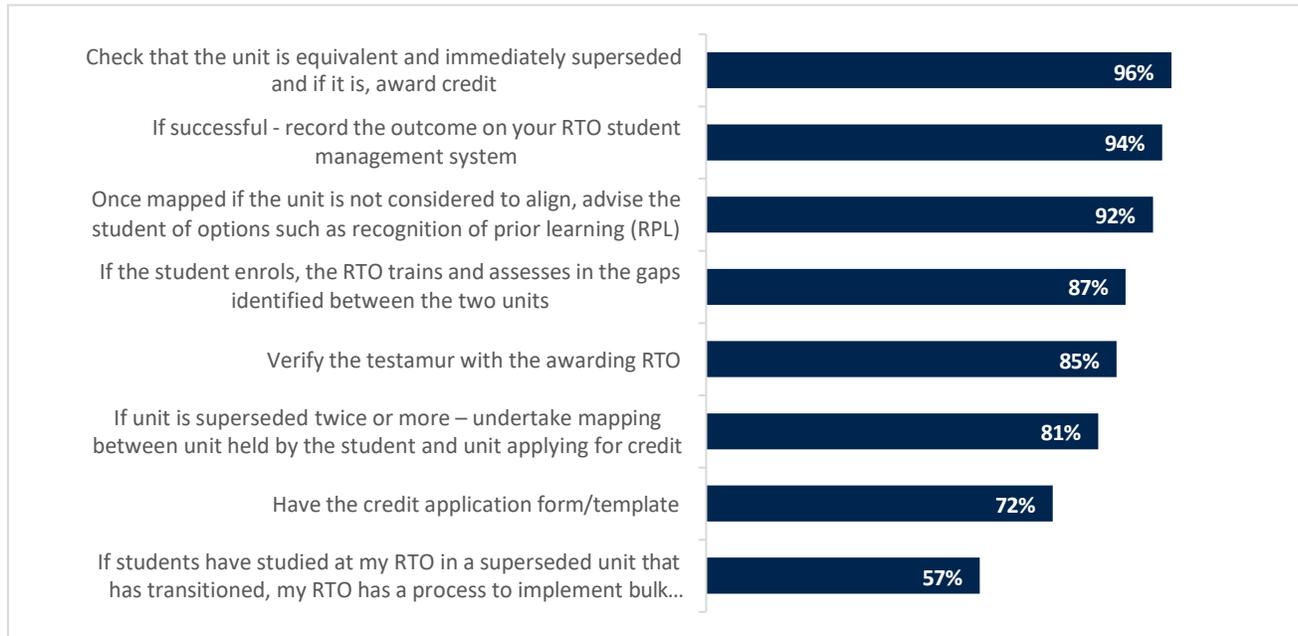
Q1. Do you have a documented process for awarding credit for superseded equivalent units in your organisation? By organisation size (number of employees) Sample size n=53

### 3.1 The process

Almost all of the RTOs:

- Awarded credit if the unit is equivalent and immediately superseded;
- Record the award of credit on the RTO student management system;
- Once mapped, if the unit is not considered to align, advise the student of options such as RPL;
- Where the student enrolls, the RTO trains and assesses the gaps identified between the two units;
- Verifies the testamur with the awarding RTO.

This is shown in the Figure 11 below.

**Figure 11: The credit process**

Q2. Do you: ....Sample size n=53

This did not vary by organisation type, size or location.

Other comments included:

*We can't have a credit process in place as the Statements of Attainments are only valid for 60 days from the date of issue. This is a High Risk Work Licence application requirement.*

*Credit is incorporated into the assessment procedure.*

*We accept and provide credit transfers to learners for units of competency where we are provided authenticated VET certification documentation issued by another RTO or AQF authorised issuing organisation. Recognition of Prior Learning offered should a straight credit transfer process not be suitable for individual circumstances.*

*USI transcript in addition to the testamur.*

*When the UOC is equivalent but superseded more than once; we advise of the options to have a gap assessment or RPL or complete the new training & assessment for the new UOC. Most student in our industry sector prefer either gap assessment or to complete the new UOC through training and assessment. They find it difficult to gather evidence for RPL in our industry sector. To verify the Award of another RTO we use the USI transcript as most of the Credit Transfer requests we receive that are not our own are awards from RTOs that are shut down or in the process of closing. Our bulk CT for internal CT is the same form as we use for external Awards.*

*We have transition mapping for all units to show what has changed. When dealing with units that have superseded more than once, we view this as a currency issue due to when the original unit would have been obtained.*

*We are a School RTO and awarding RPL is not common for our students.*

*Our Registered Training Organization (RTO) currently provides two Certificate Level I courses.*

*Although we have a comprehensive Credit Transfer Application process and explanation in our Student Handbook, to date, no student has availed themselves of this option. We have developed unit mappings for both the superseded and current courses, however, a consolidated mapping of both superseded and current versions is currently not available in a single document.*

*Verify testamur with awarding RTO if it could not be verified electronically or by matching via USI Portal. Requirement that to renew Traffic Management Accreditation that participants provide evidence of active industry engagement and also undertake a refresher course.*

*Being an RTO School I need to have all qualification transition documents mapped out a good 12-18 months in advance. This is to ensure that there is no negative impact on the students and their ability to complete the qualification and achieve their WACE requirements. The process needs to be in place for when we are course counselling students and parents.*

*Our Organisation has a Credit Transfer Policy. However, our Organisation has a binding agreement with the Department of Transport (DoT) with regard to the process required to meet the Licencing Standards for Practical Driving Assessment (PDA) Purposes. The DoT Agreement specifies the current unit of competency must be held by the candidate to obtain a Western Australian driver's licence (DL) of the equivalent class. Only equivalent superseded units of competency can be considered for a Credit Transfer.*

*This request for awarding credit for superseded equivalent units has never occurred. The answer to the above criteria are based on the response we would have for the request - not a sample that has occurred.*

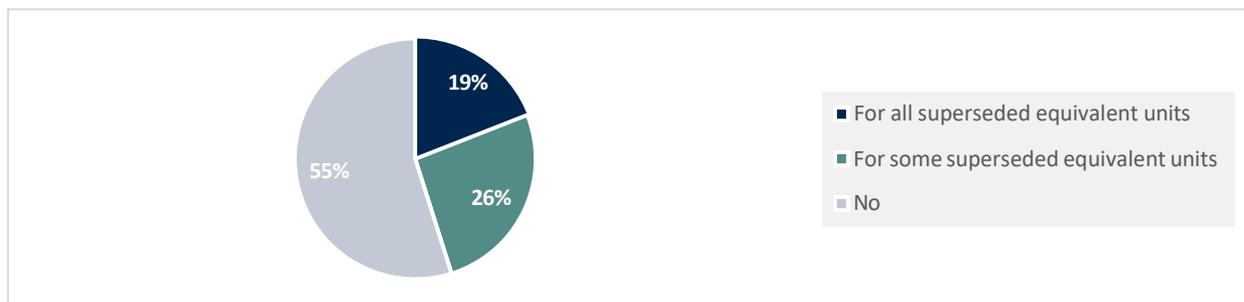
*We look at experience - recognition of current competencies - professional development to capture skills.*

*Credit is normally reviewed and given as part of our apprentice enrolment process or as par of RPL so assessment of qualification documents or USI records is completed during this process.*

### 3.2 The mapping processes

RTOs were fairly evenly divided between those who had pre-prepared mapping processes for superseded equivalent units and those who did not.

**Figure 12: Incidence of pre-prepared mapping process for superseded equivalent units**



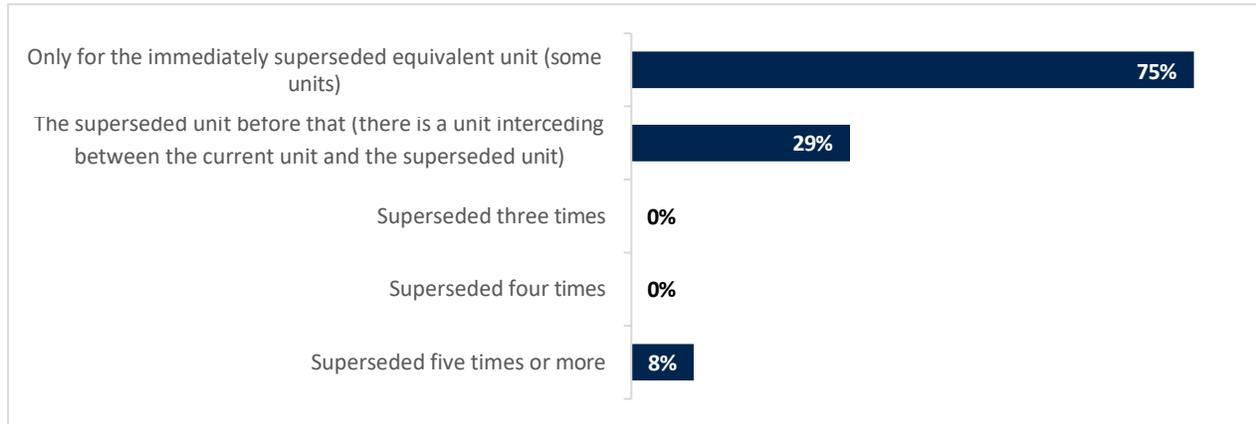
*Q3a. Do you have pre-prepared mapping processes for superseded equivalent units? And Q3b. Are these pre-prepared mapping processes in place for all superseded equivalent units or only some of them? Sample size n=53*

There was no difference in whether or not an RTO had pre-prepared mapping processes for superseded units regardless of its size, location or length of time in business.

### 3.3 How far back mapping processes go.

The majority of the RTOs (75%) have mapping processes only for the immediately superseded equivalent units, as shown in the following chart. Less than 10% of the RTOs had mapping processes that went back to units superseded three or more times.

**Figure 13: The mapping processes**



Q3c. How far back do the mapping processes go? If different processes apply for different units, please select all that apply... (Filtered by RTOs with prepared mapping processes) Sample size n=24

### 3.4 Who determines the credit applications.

The person responsible for determining the credit applications varied considerably between organisations. For some organisations, this was an administrative process. In other organisations, the determination was undertaken by specialists, assessors, trainers and unit coordinators.

**Figure 14: Responsibility for determining credit applications**

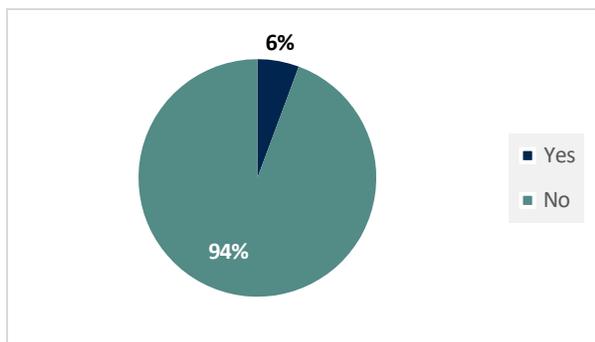


Q3d. Who is responsible for determining credit applications? If the person responsible is different for different units, please select all that apply. - It's determined by somebody else: (Please specify who?) Sample size n=53

## 4.0 Fees

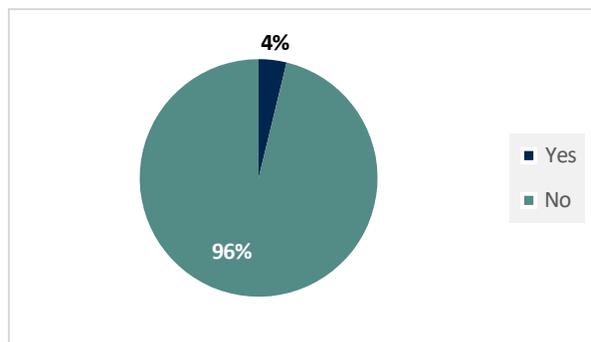
Few RTOs charge a fee when the student applies for credit. Those who charge a fee are all small RTOs with five or fewer employees. Further, only some RTOs charge a mapping fee to students where the unit needs to be mapped against previous equivalent units, again, those who charged a fee tend to be the smaller RTOs with less than ten employees, and all are private regional RTOs.

Figure 15: Application fee when applying for credit



Q4a. Is there an application fee for the student when applying for credit? Sample size n=53

Figure 16: Mapping fee



Q4b. Is there a mapping fee for the student where the unit needs to be mapped against previous units? Sample size n=53

### 4.1 Processes for which fees are charged

Fees are charged by a minority of RTOs in the following circumstances:

- Mapping fees where the unit is superseded twice or more and the mapping confirms that no gaps exist in the training and assessment requirements resulting in the award of credit (**6%**);
- Fees are charged for checking that the unit is equivalent and immediately superseded if the credit is awarded (**2%**);
- A flat fee applied for the RPL assessment (**2%**).

The majority of RTOs (90%) charge no fees for any aspect of the credit process.

Fees charged for the mapping process:

- Two RTOs charged \$150.00
- One RTO charged \$500.00.

Where a flat fee was applied for the RPL assessment, the respondent said they charged \$1,800.00; this was a large RTO with more than 1,000 students indicating that this was not a per-student fee.

### 4.2 Extent to which credit is granted for superseded units

In 2022, just under half of the RTOs (43%) had granted credit for an immediately superseded equivalent unit of competency, and one in five RTOs (21%) had granted credit for a superseded equivalent unit of competency where the unit had been superseded twice or more.

The number of students for whom credit had been granted varied widely from two students being granted credit for immediately superseded equivalent units of competency to two RTOs who had granted credit for more than 1,000 students.

Smaller organisations with under five employees and students with under 100 students were less likely to have granted credit for immediately superseded equivalent units of competency.

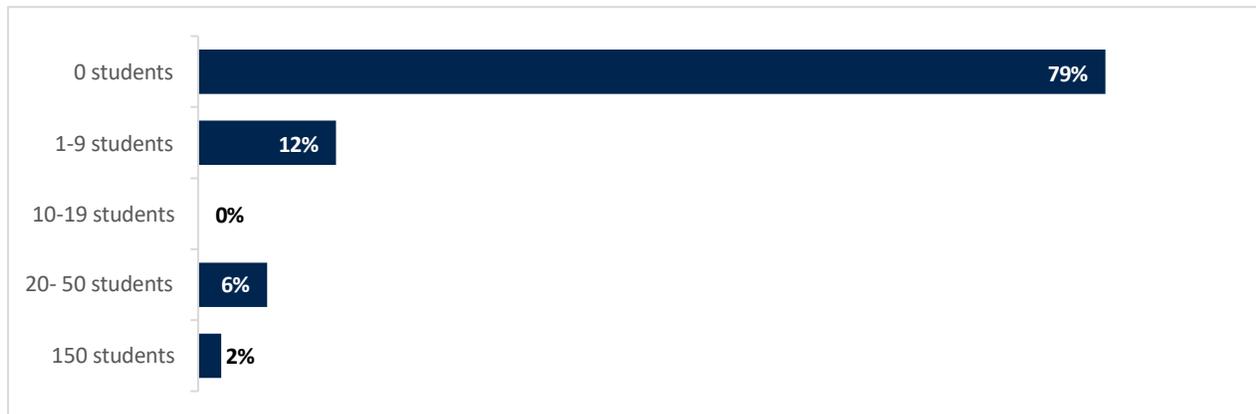
**Figure 17: Credit granted for immediately superseded equivalent units**



*Q6a1 How many students were granted a credit for a superseded equivalent unit of competency for immediately superseded units? Sample size n=53.*

Removing the largest outlier, which was 4,140 students granted credit by one RTO (which is not typical of RTO responses generally), the average number of students receiving credit for an immediately superseded equivalent unit of competency was 57 students amongst RTOs who had awarded credit to immediately superseded units in 2022.

**Figure 18: Credit granted for equivalent units superseded twice or more**



*Q6a2 How many students were granted a credit for a superseded equivalent unit of competency for units superseded twice or more? Sample size n=53*

In all, 21% of RTOs granted credit for superseded equivalent units of competency where the unit had been superseded twice or more; here, the average number of students was 13 in 2022.

Units for which the most number of credits were issued are shown on the following page.

The table provides the information provided by RTOs responding; some RTOs could not provide both the unit number and full name of the unit.

<b>Construction, Plumbing and Services</b>	<b>Electrotechnology</b>	<b>Business Services</b>
<p>CPCCWHS2001 - Apply WHS requirements, policies and procedures in the construction industry</p> <p>CPCCOM1014 - Conduct workplace communication</p> <p>CPCCCM2006 - Apply basic levelling procedures</p> <p>CPCCOM1015 - Carry out measurements and calculations</p> <p>CPCCCM2008 - Erect and dismantle restricted height scaffolding</p> <p>CPCCOM1012 - Work effectively and sustainably in the construction industry</p> <p>CPCCOM2001 - Read and interpret plans and specifications</p> <p>CPCCCM2012 - Work safely at heights</p> <p>CPCCOM1013 - Plan and organise work</p> <p>CPCCA3002 - Carry out setting out</p> <p>CPCCCO2013 - Carry out concreting to simple forms</p>	<p>UEENEEE101B - Apply Occupational Health and Safety regulations, codes and practices in the workplace</p> <p>UEENEE E107B - Use drawings, diagrams, schedules, standards, codes and specifications</p> <p>UEENEEE105B - Fix and secure electrotechnology equipment</p> <p>UEENEEE102B - Fabricate, assemble and dismantle utilities industry components</p> <p>UEENEEG101B - Solve problems in electromagnetic devices and related circuits</p> <p>UEENEEE104B - Solve problems in d.c. circuits</p> <p>UEENEEG102B - Solve problems in low voltage a.c. circuits</p> <p>Electrical TP Transition</p>	<p>BSBITU201 - Produce simple word processed documents</p> <p>BSBWHS301 – Maintain workplace safety</p> <p>BSBPEF101 – 2 Plan and prepare for work readiness</p> <p>BSBMED301A - Use advanced medical terminology</p> <p>BSBTEC201 - Use business software applications</p> <p>BSBTWK201 - Work effectively with others</p> <p>BSBPEF202 - 3 Plan and apply time management</p> <p>Certificate II in Workplace Skills units</p>
<b>Community Services</b>	<b>Health</b>	<b>Automotive</b>
<p>CHCDIV001 – Work with diverse people</p> <p>CHCCCS011 - Meet personal support needs</p> <p>CHCCOM005 - Communicate and work in health or community services</p> <p>CHCDIV002 - Promote Aboriginal and/or Torres Strait Islander cultural safety</p> <p>CHCPRT001 - Identify and respond to children and young people at risk</p> <p>CHCDIV001 - Work with diverse people</p>	<p>HLTAID011/HLTAID003 – Provide First Aid</p> <p>HLTAID004 - Provide an emergency first aid response in an education and care setting</p> <p>HLTINF001 - Comply with infection prevention and control policies and procedures</p> <p>HLTHWS001 - Participate in workplace health and safety</p> <p>HLTWHS002 - Follow safe work practices for direct client care</p>	<p>AURASA102 - Follow safe working practices in an automotive workplace</p> <p>AURTE104 - Inspect and service engines</p> <p>AURTTA104 - Carry out servicing operations</p> <p>AURTTK102 - Use and maintain tools and equipment in an automotive workplace</p> <p>AURTTB101 - Inspect and service braking systems</p>
<b>Training and Education</b>	<b>Creative Arts and Culture</b>	<b>Resources and Infrastructure</b>
<p>TAEASS402 - Assess competence</p> <p>TAEDES401 - Design and develop learning programs</p> <p>TAEDEL402 - Plan, organise and facilitate learning in the workplace</p> <p>TAEDES402 - Use training packages and accredited courses to meet client needs</p> <p>TAEDEL401 - Plan, organise and deliver group-based learning</p>	<p>CUACHR311 - Develop basic dance composition skills</p> <p>CUADAN212 - Incorporate artistic expression into basic dance performances</p> <p>CUAWHS311 - Condition body for dance performance</p>	<p>RIICOM201D – Communicate in the workplace</p> <p>RIIRIS402E - Carry out the risk management process</p>

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*We issued straight credit transfer (outcome code 9 for WA specific reporting) for 850 units in 2022 - across all units in the CHC and HLT training packages. We issued Recognition of prior learning (outcome code 6 for WA specific reporting) for 66 units in 2022.*

*Common units within Painting and Plumbing for apprentices and pre-apprentices that had started in the old qualifications.*

*These units are assessed for apprentices who may have completed a pre apprenticeship or completed these units as part of another qualification some time ago.*

*Numerous units under AUR, MEM and CPC (training product transitions).*

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## 5.0 The Advantages and Risks of Automatically Granting Credit for Superseded Equivalent Units where the unit has been superseded twice or more and has not been mapped

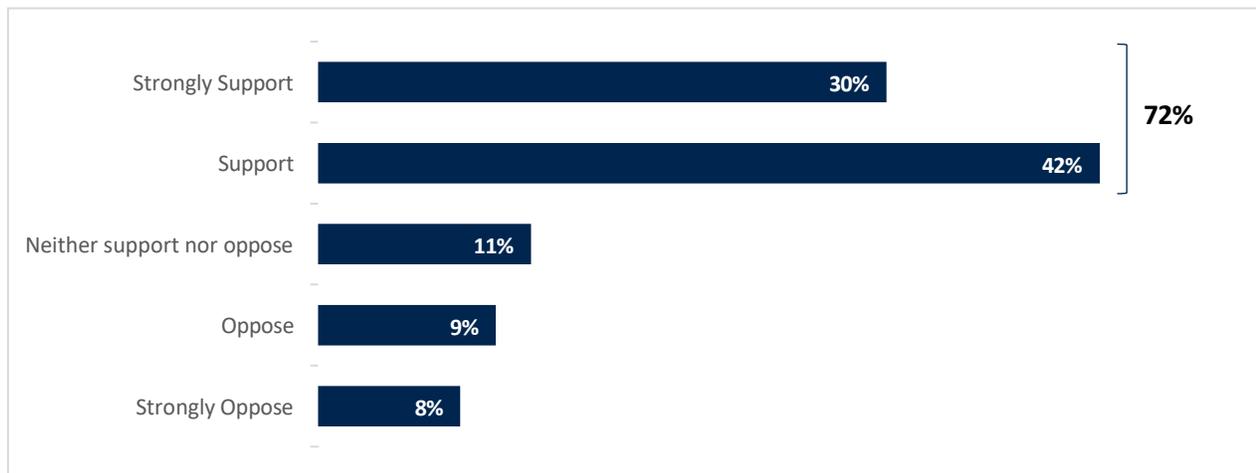
The Council's position on granting credit to students for superseded units of an equivalent level of competency is that:

- RTOs can award credit using the equivalent determination where the unit of competency already obtained by the learner immediately precedes the unit for which the credit transfer will be awarded;
- Where an award of credit is sought for a unit of competency that has been superseded twice or more (e.g. there is a unit interceding), then the RTO must conduct a mapping process to confirm no gaps exist in the training and assessment requirements between the unit already obtained by the learner and the unit from which the learner seeks to receive an award of credit. Where gaps in the training assessment requirements are identified, no credit can be provided.

The majority (72%) of RTOs participating in the consultation supported TAC's position where an award of credit is sought for an equivalent unit of competency that has been superseded twice or more. Here, TAC's position is that the RTO must conduct a mapping process to confirm no gaps exist in the training and assessment requirements and that no credit be awarded where the mapping process identifies gaps in the training assessment or requirements. This support includes 30% of RTOs who strongly support TAC's position.

There were no differences in support for TAC's position on credit by RTO size, location, length of time in Business, or type.

**Figure 19: Support for TAC's position on credit**



Q7a. Do you support or oppose the TAC's position on credit? Sample size n=53

The reasons for support of TAC's position on credit was a 'free text' question, and the answers were diverse, with no more than 26% of RTO supporting any one reason.

The reasons are listed in order of support\*:

- Concerned about currency where the unit is superseded more than once. Units change over time, even if deemed equivalent, as people forget;

*\*These are verbatim responses which have been grouped into similar themes for ease of interpretation.*

- The student is deemed competent against the most up-to-date qualification where units have already been deemed equivalent;
- Due diligence in terms of mapping is required where the unit is superseded more than once to identify gaps/changes in industry best practices. (both a positive and negative);
- Simpler, streamlined process for equivalent units immediately superseded;
- May require students to do more training (in some instances) / Better to redo as they will be more up to date. (both a positive and negative);
- The position is clear and recognises the level of risk associated with granting of credit - reflects current practices and processes are in place;
- It is fair and transparent to those who can demonstrate competency;
- There is a lack of consistency in determining equivalency; we need guidance here;
- Happy to do so if the unit immediately precedes.

The reasons for opposition to TAC's position:

- Need to acknowledge students' prior skills. If the student still has the same level of skills and knowledge, these should be recognised;
- There is a lack of consistency in determining equivalency; we need guidance here;
- Our RTO works with national employers, and their employees in WA are treated differently than those in other states;
- Mapping should be a requirement of the developer;
- The student may need to pay a fee for the mapping process;
- It is a compliance burden for our RTO;
- Students may not receive credit from a TAC RTO but will from an ASQA RTO for the same units;
- Students will be told to only apply to ASQA RTOs if they want to get credit for a unit superseded twice or more.

Some RTOs gave positive and negative reasons for opposing TAC's position on credit.

### **5.1 The advantages of granting credit automatically where the equivalent unit has been superseded twice or more and not mapped**

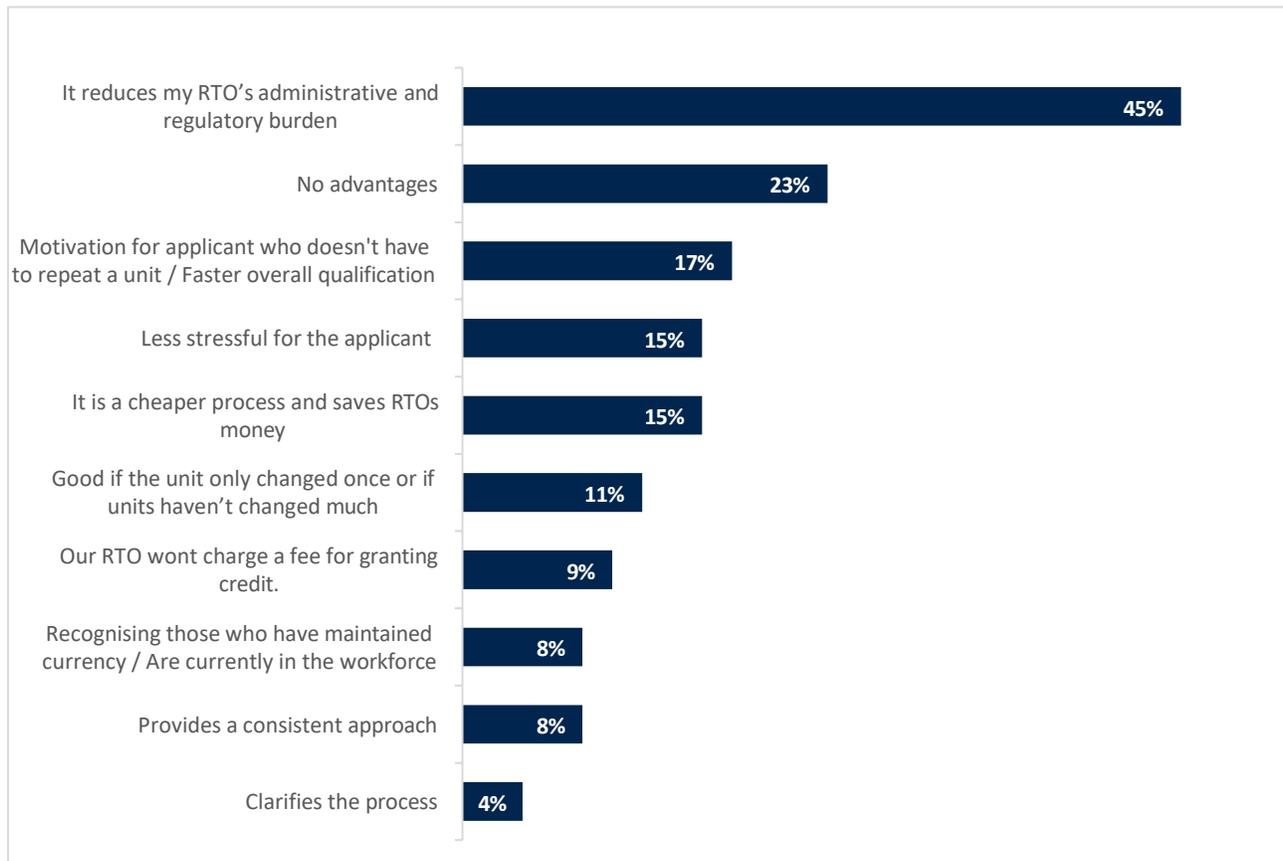
Reducing the RTOs' administrative and regulatory burden is the main advantage identified by RTOs for granting credit automatically for equivalent superseded units where the unit has been superseded twice or more and where it is not mapped.

Other advantages were perceived to be\*:

- Motivation for the applicant who doesn't have to repeat a unit / faster overall qualification;
- Less stressful for the applicant;
- It is a cheaper process and saves RTOs money;
- Good if the unit only changed once or if units haven't changed much.

The advantages are shown in the following Figure 20.

*\*These are verbatim responses which have been grouped into similar themes for ease of interpretation.*

**Figure 20: The advantages of granting credit automatically for all equivalent superseded units**

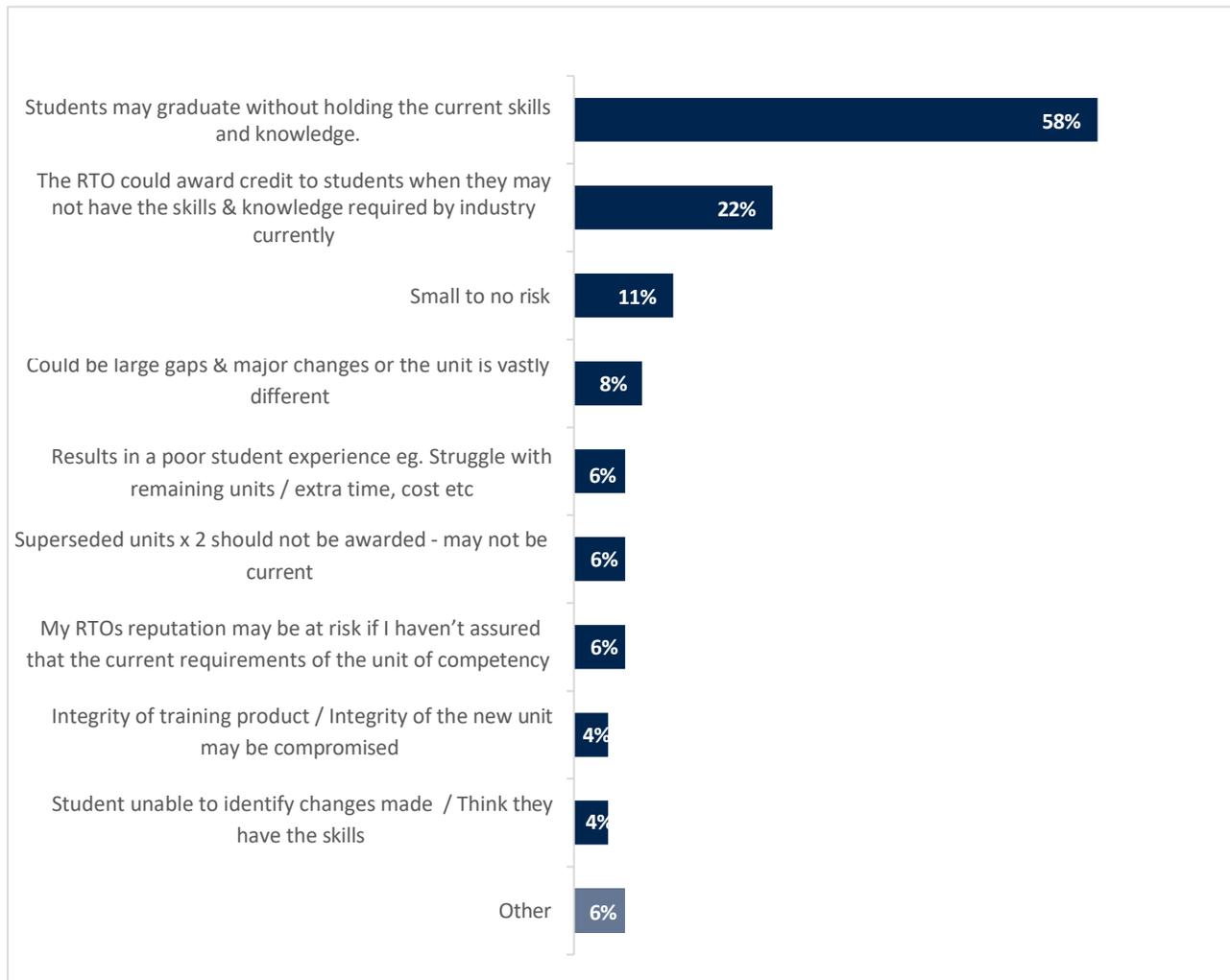
*Q8a What do you think are the advantages of granting credit automatically for equivalent superseded units where the unit has been superseded twice or more and where it is not mapped (verbatim responses grouped into similar themes). Sample size n=53*

There were no differences in perceptions between type of RTO, length of time in business, size, or location.

## 5.2 The risks of granting credit automatically for all superseded equivalent units

RTOs felt the greatest risk was that students might graduate without holding the current skills and knowledge (58%). RTOs felt the second greatest risk to be that they would award credit to students when they may not have the skills and knowledge required by industry in the current units in the qualification (22%).

The risks are shown in Figure 21.

**Figure 21: The risks of automatically granting credit for all superseded equivalent units**

*Q8b What do you think are the risks of granting credit automatically for superseded equivalent unit of confidence where the unit has been superseded twice or more and where it is not mapped (by category) (verbatim responses grouped into similar themes). Sample size n=53*

There were no differences in perceived risks by type of RTO, location, length of time in business, or size.

Initial responses to the risks of granting credit automatically for superseded units where the unit has been superseded twice or more and not mapped identified in Figure 21 above and mainly focus on the two issues\*:

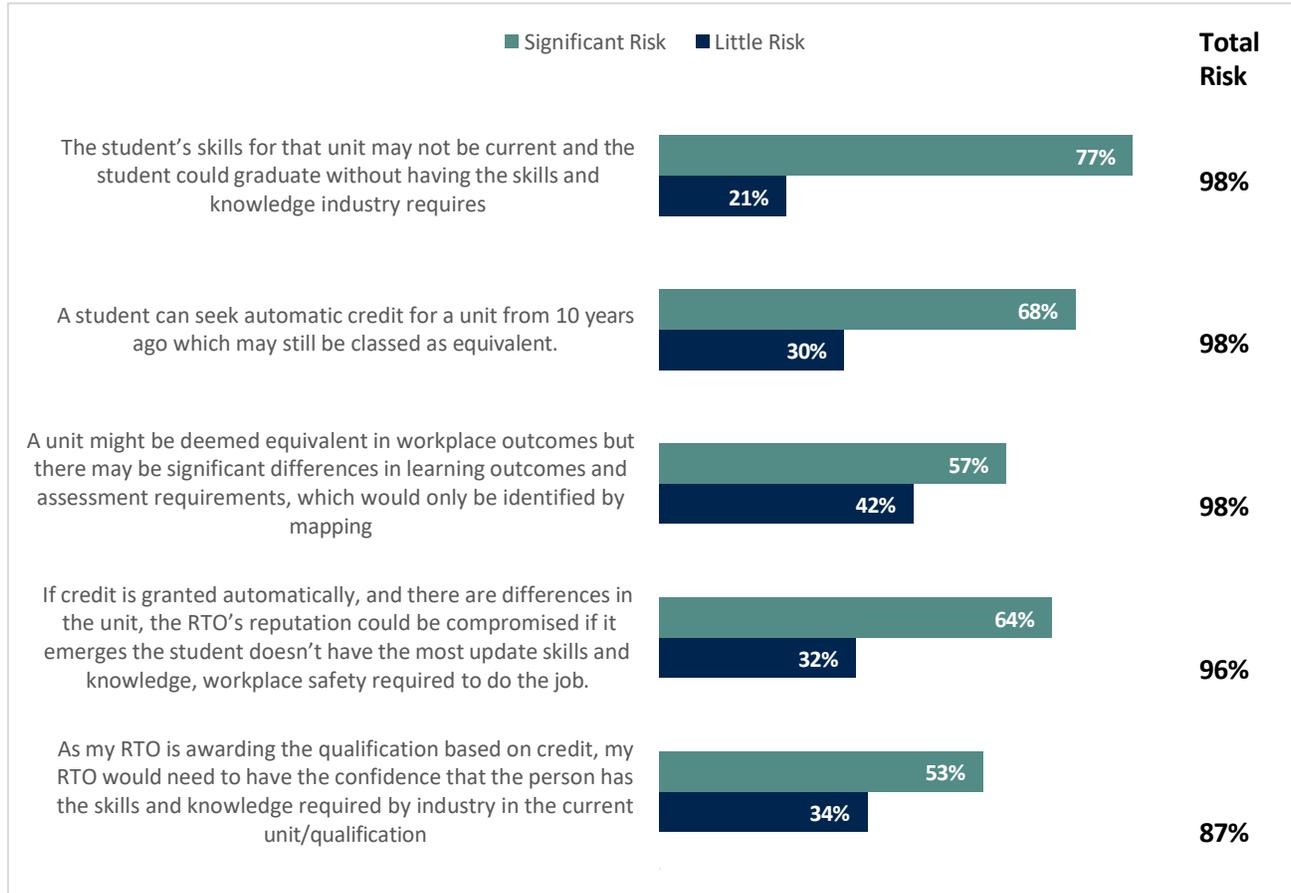
- Students may graduate without holding the current skills and knowledge;
- The RTO could award credit to students when they may not have the knowledge required by the industry currently.

The questionnaire then provided RTOs with a list of situations that TAC had deemed a significant risk and invited the RTOs to comment on the degree of risk they felt was associated with each.

*\*These are verbatim responses which have been grouped into similar themes for ease of interpretation.*

The risk that students could graduate without having the current skills and knowledge that the industry requires continues to be perceived as the most significant risk. However, many of the other areas were seen to pose a significant risk to the majority of RTOs, and few RTOs perceive there to be no risk involved with these situations.

**Figure 22: Prompted evaluation of the risks associated with automatically granting credit**



Q8c. Here are some factors which have been identified which you may or may not feel are risks associated with automatically granting credit. Please rate the degree of risk you feel is associated with each of these statements. Sample size n=53

The majority of RTOs felt that there were no units within their scope of delivery that had changed so significantly that they needed to be mapped to previous versions. However, 17% of RTOs identified units that they felt had changed significantly and should be mapped to previous versions.

The RTOs provided the following information on the units which they felt had changed significantly.

Unit number	Unit name
SHBBFAS004	Provide lash and brow services
SHBBHRS010	Provide waxing services
SHBBFAS005	Provide facial treatments and skin care recommendations
HLTAID011 - HLTAID003	
CHCDIV001 - HLTHIR403C	
HLTINF001 - HLTIN301C	

Unit number	Unit name
CHCLEG001 - CHCCS400C	
HLTWHS001 - HLTWHS300A	
UEEEL020	Solve problems in low voltage A/C circuits
UEEEL021	Solve problems in magnetic and electromagnetic devices
UEECD0044	Solve problems in multiple path circuits
UEECD0046	Solve problems in single path circuits
HLTAID011	Provide first aid
HLTAID009	Provide CPR
HLTAID012	Provide first aid in an education and care setting
HLTAID010	Provide basic emergency life support
HLTINF006	Apply basic principles and practices of infection prevention and control
TAEDES411	
TAEDES412	Design and develop plans for vocational training
TAEDEL411	Facilitate vocational training
TAEASS412	Assess competence
TAEASS512	Design and develop assessment tools

## 6.0 Industry and Employer Advantages and Risks

RTOs believe that industry and employers perceive the automatic application of credit to be an easy, quick and cheap process that may enable the industry to address skill shortages quickly; however, RTOs felt that industry and employers would be concerned that the students they receive may not meet current industry requirements and that if the credit isn't automatically applied, students may need more training. Further, those costs may be prohibitive for employers if employees don't receive automatic credit.

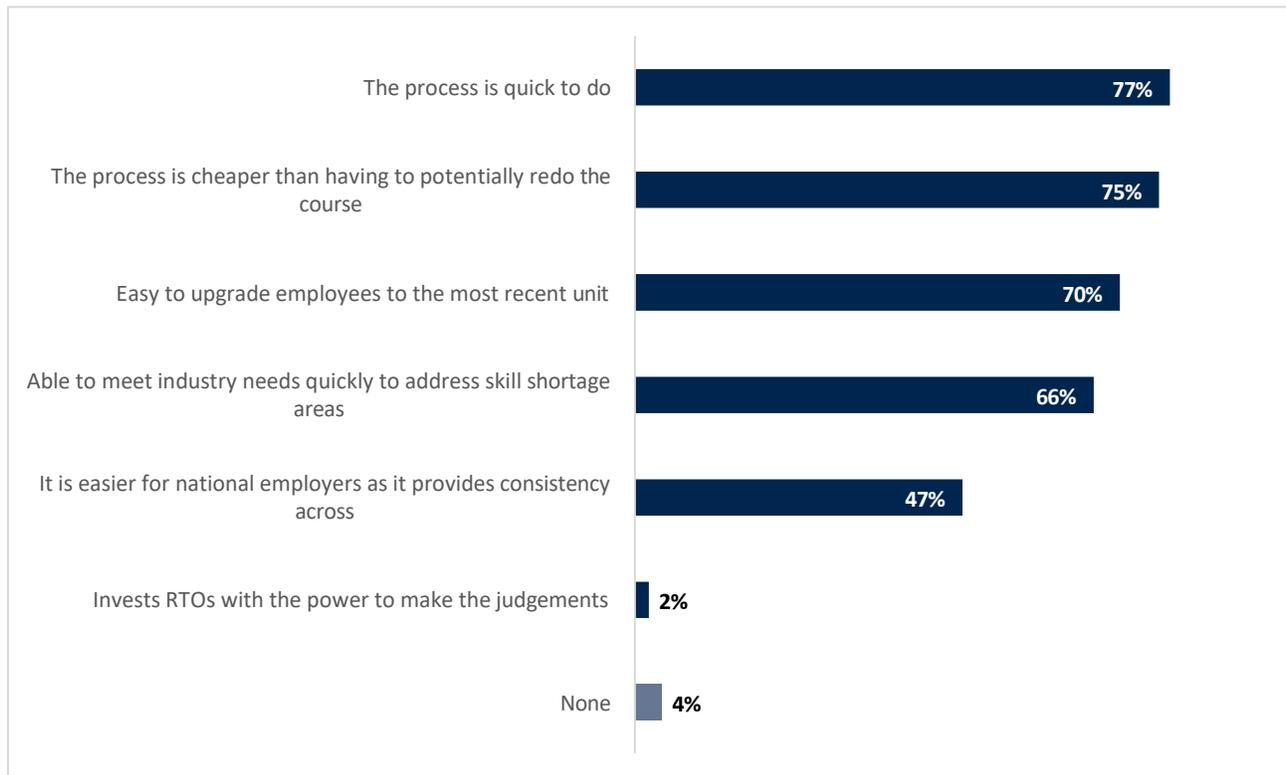
RTOs were concerned that their reputation might be at risk in the eyes of the employer if the graduate didn't have the required skills and knowledge contained in the most recent version of the unit.

### 6.1 The advantages

The key advantages which RTOs consider for industry and employers associated with the automatic application of credit are:

- The process is quick to do;
- The process is cheaper than having to potentially redo the course;
- It is easy to upgrade employees to the most recent unit;
- Ability to meet industry needs quickly to address skill shortage areas.

**Figure 23: Industry and employer perceptions of the advantages of automatic application of credit**

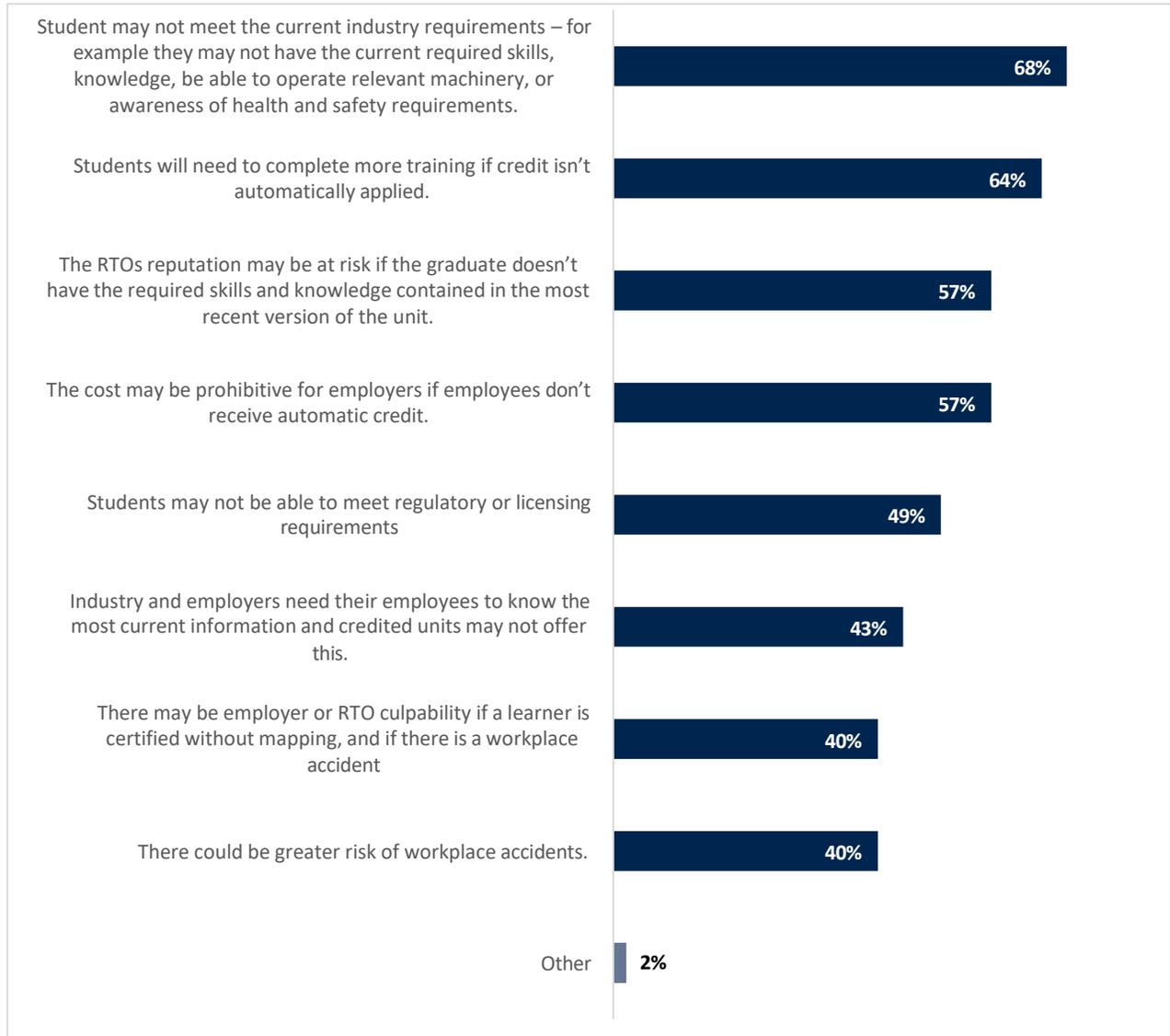


*Q10 What do you feel the industry and employers that you work with see as the advantages of the automatic application of credit? Please click on all that you feel apply and add any others. - Anything else? Please specify:.... Sample size n=53*

## 6.2 The risks

The major risks RTOs perceived industry and employers to be concerned about are similar to those the RTOs are concerned about themselves that students may not meet current industry requirements. The risks are shown in the following Figure.

**Figure 24: Industry and employer perceived risks**



Q11 What do you feel the industry and employers that you work with see as the risks: Please select all that you feel apply and add any others. Sample size n=53

The other response was:

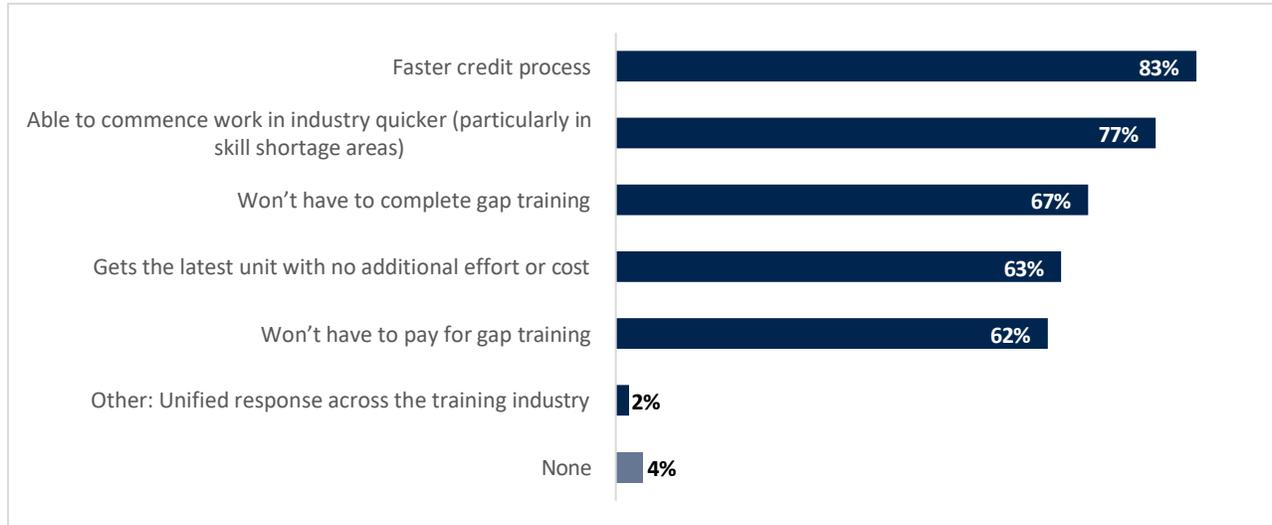
*Our primary Industry Traffic Management requires a refresher course every three years and having achieved current or previous units of competence and statements of attainment. WorkSafe also allow the reissue of a "White Card" even if it was from 10 years ago.*

## 7.0 The Impacts on the Students

The main impact on the students perceived by RTOs was a faster credit process and the ability to commence work in the industry more quickly (particularly in areas of skill shortage); however, the risks to students were felt to be that the student may not understand the current requirements in the industry and that there may be job role gaps if credit is automatically applied.

### 7.1 Positive impacts on students of automatic applications of credit

Figure 25: Positive impacts on students

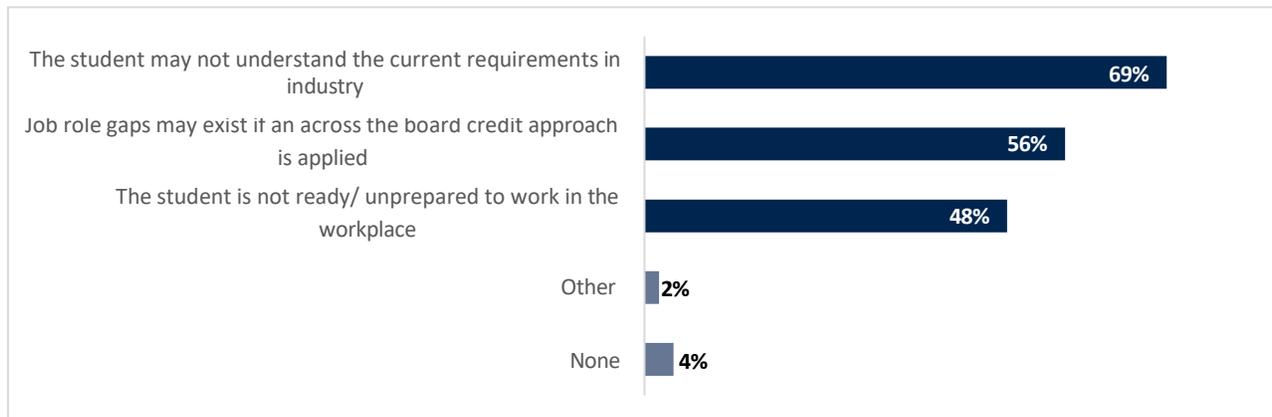


Q12 What do you feel are the positive impacts on students as a result of the automatic application of credit? Please select all that you feel apply and add any others. - Other? Please specify:.... Sample size n=52; 1 no response

### 7.2 The risks to students as a result of the automatic application of credit

The RTOs feel that the risks to students are that they may not understand the current requirements in the industry and that it may result in job role gaps. See Figure 26 below.

Figure 26: The risks to students



Q13 What do you feel are the risks to students as a result of the TAC's position on the automatic application of credit? Please select all that you feel apply and add any others. - Anything else? Please specify:.... Sample size n=52; 1 no response

The other response was:

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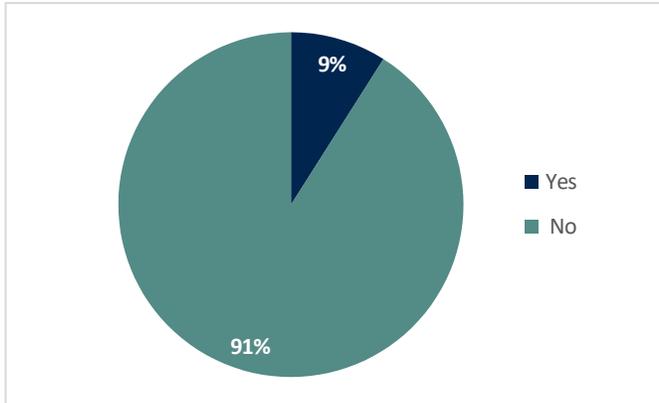
*The chance that individual units would not have significant impact on trade outcomes. There are skilled workers that obtained their certificates 40 years ago with more knowledge than many coming through the system today. They form the industry consultation groups.*

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## 8.0 TAE Qualifications

TAE qualifications were delivered by a minority of RTOs (9%) responding to the survey.

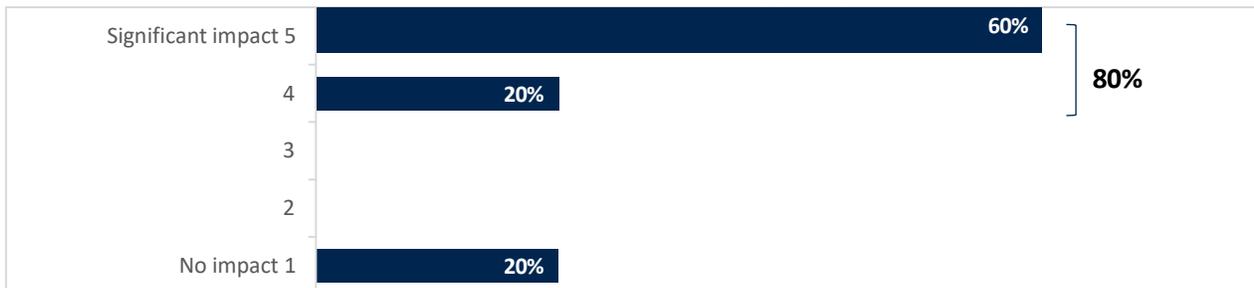
Figure 27: TAE qualifications



Q14a Do you deliver any TAE qualifications? Sample size n=53

The impact of TAC's position on credit on trainers and assessors upgrading to the new TAE qualifications was perceived to be significant by the majority of respondents delivering TAE qualifications. Four out of the five RTOs delivering TAE qualifications felt it would have a significant or fairly significant impact.

Figure 28: The impact of TAC's position on credit on trainers and assessors upgrading to the new TAE qualifications



Q14b. What impact does the TAC's position on credit have on trainers and assessors upgrading to the new TAE qualifications?

These RTOs identified the impact as significant for the following reasons:

*TAEDEL UoC is one of the UoCs most common in CT applications.*

*The impact can be time consuming however it is essential to ensure the students are appropriately qualified to deliver the current TAE qualifications.*

*Some replaced TAE units require more individuals be included in the assessments which may be difficult for small organisations. Demonstration with 3 individuals to 8 individuals should be no different so an automatic credit would be beneficial and therefore a significant impact by not having to address the "gap" in assessment requirements.*

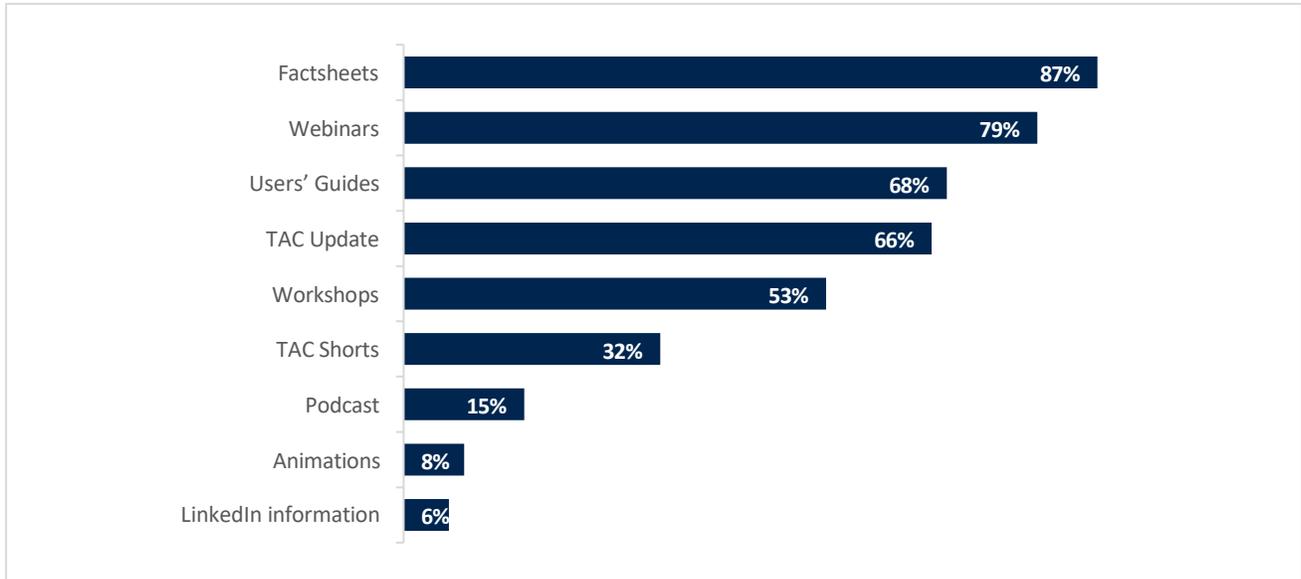
The one RTO who felt that there would be no impact noted that amongst their courses as there were only four units that have equivalency and that they would not go back any further anyway.

## 9.0 Useful Support Resources

Support resources that RTOs would find most useful are:

- Factsheets
- Webinars
- Users' Guides
- TAC updates.

**Figure 29: Useful support resources**



Q15 Which of the following support resources would you find useful? Please select as many as apply. Sample size n=53

The types of resources and their degree of usefulness were common to all types and sizes of RTOs in the country and metropolitan area.

## 10.0 Other Comments on Credit

Eleven RTOs made further comments on credit. These comments are included below.

The need to be industry specific not take an across-the-board approach:

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*The risk is when credit rules are applied across the board when some industries are lot higher risk than others. Each application should be addressed on its merits.*

*Perhaps some industry specific in relation to currency and credit.*

*Each industry is different and an overall approach to credit transfers needs to be carefully applied.*

*Need guidance from TAE. (2 comments)*

*If TAC goes down this path, would be helpful to have a fact sheet on how to do, plus industry need to provide guidance on what is acceptable.*

*Clarity is paramount in the regulator's information available to RTOs via Fact Sheet or the likes.*

---

### Other issues:

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*This is very much a double-edged sword. From an RTO perspective we must evidence currency and when superseded twice or more, this cannot be done. However if an apprentice obtained their qualification from a package that had been superseded twice or more, it doesn't make them less capable of working in their given trade. Having a base line is a good thing, but common sense must prevail.*

*I feel it really depends on the Qualification someone is seeking a credit for and how long ago they were awarded the unit and or qualification they are seeking a credit for as to if they should be awarded it I think if it's over 12 months and it's a specialised area or WHS related etc. then I think they should have to re study if it was issued more than 12 months prior.*

*Training Packages are cumbersome and the root cause of the issues. They take far too long to maintain currency. If you deliver non-accredited training then the problem is alleviated.*

*The biggest issue for us and I know many other RTOs is time to get the mapping completed. With changes to multiple packages in the last two years keeping up with this as well as the skill shortages in the industry (which pushes us as RTO as its about getting the work done) has been exhausting.*

*In addition to the risks and benefits of the automatic application of credit, it is important to consider the broader context of credit transfer in vocational education and training (VET). Credit transfer plays an important role in enabling students to access flexible pathways to education and training, which can support their professional development and career aspirations. However, it is also important to ensure that credit transfer is conducted in a rigorous and transparent manner, with appropriate assessment and mapping of prior learning to ensure that students have the skills and knowledge required by the industry. Furthermore, the quality of credit transfer processes can also impact the reputation of vocational education and training institutions and*

*the broader VET sector. As such, it is important for institutions to adopt best practice approaches to credit transfer, including ensuring that credit transfer policies and procedures are clearly communicated to students, that appropriate assessment and mapping processes are in place, and that ongoing quality assurance processes are conducted to monitor the effectiveness of credit transfer. Overall, while credit transfer can offer significant benefits to students, institutions, and the broader VET sector, it is important to approach it in a considered and systematic way to ensure that the risks are effectively managed and that students are able to achieve their educational and career goals.*

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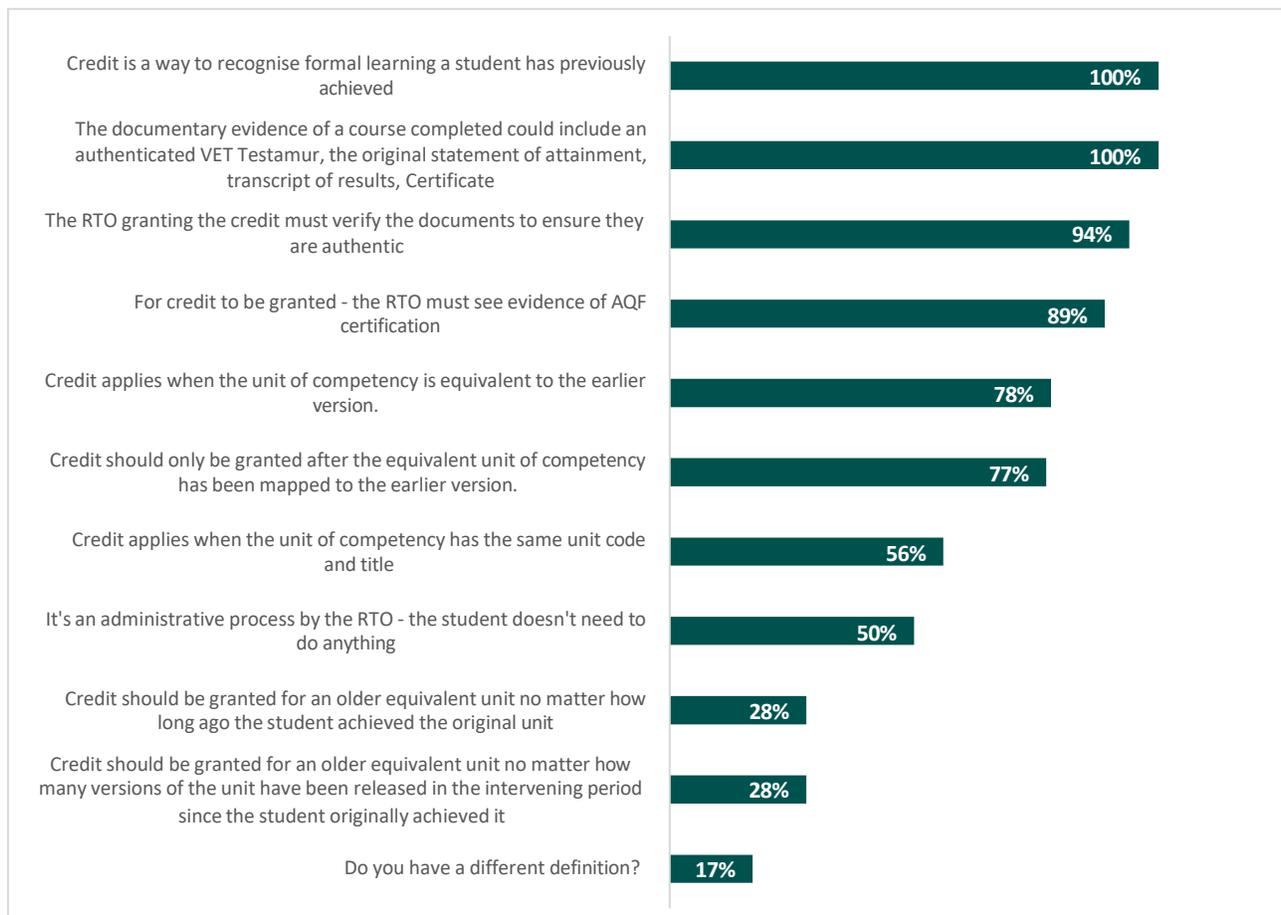
## **Stakeholders' views on the application of credit for superseded equivalent units**

## 11.0 Stakeholder Understanding of Credit

The main ways in which stakeholders defined credit were:

- Credit is a way to recognise formal learning a student has previously achieved;
- The documentary evidence of a course completed could include:
  - an authenticated VET Testamur
  - the original statement of attainment
  - transcript of results
  - Certificate;
- The RTO granting the credit must verify the documents to ensure they are authentic;
- For credit to be granted, the RTO must seek evidence of the AQF<sup>1</sup> certification;
- Credit applies when the unit of competency is equivalent to the earlier version; and
- Credit should only be granted after the equivalent unit of competency has been mapped to an earlier version.

**Figure 30: Stakeholders definition of credit**



*Q1 Firstly, we would like to ensure that when we talk about credit for units of competency, we are all thinking about it in the same way. I would like to start by reading out a series of definitions of credit and ask that you tell me which ones you believe to be correct? Sample size n=18*

<sup>1</sup> AQF is the **Australian Qualifications Framework (AQF)**

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Verbatim quotations illustrating different definitions:

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*Only in relation to mutual recognition because that's a pretty standard arrangement between us so that credit transfers are recognised. The only other one is if credit is granted automatically to equip the equivalent units of competency without the RTO mapping to see if the learning outcomes are the same.*

*I have answered some with no as I believe older qualifications should be superseded no matter what.*

*We are only talking about credit transfers for onshore students, you need to consider the offshore students that come in as well for licensing. We do quite a lot of mapping with the students to breach the gap in different qualifications.*

---

Stakeholders generally disagreed that:

- Credit should be granted for an older equivalent unit no matter how long ago the student achieved the original unit;
- Credit should be granted for an older equivalent unit no matter how many versions have been released in the intervening period since the student initially achieved it.

Across all types of stakeholders, opinions varied in relation to:

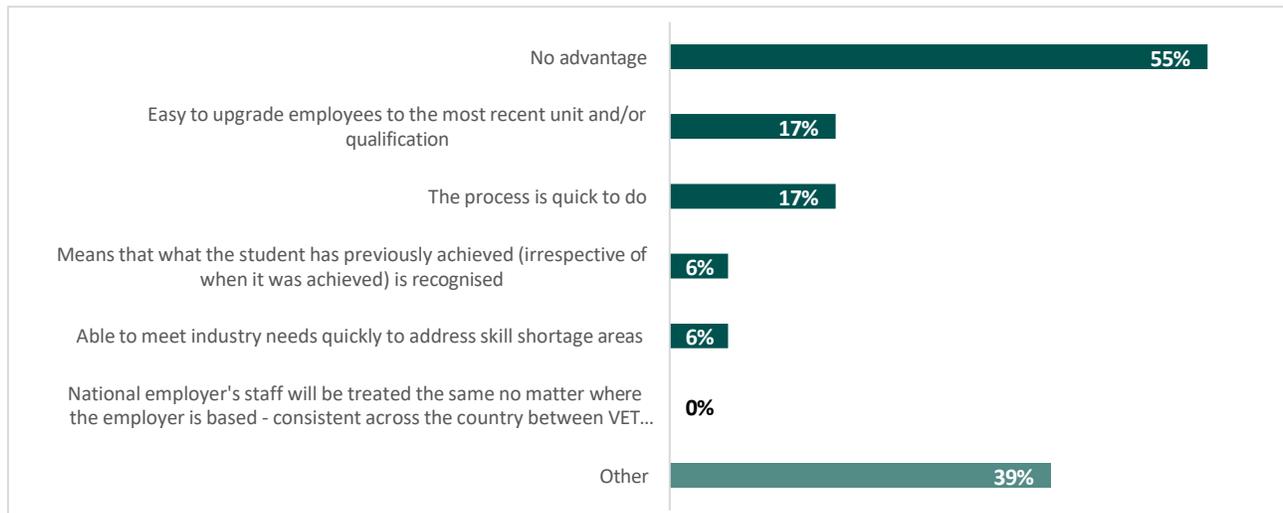
- Credit is an administrative process by the RTO – the student doesn't need to do anything.

## 12.0 The Advantages and Risks of Automatically Granting Credit for Superseded Equivalent Units where the unit has been superseded twice or more and where it has not been mapped

### 12.1 The advantages

The majority of stakeholders felt that there were no advantages of granting credit automatically for superseded equivalent units where the unit has been superseded twice or more and where it has not been mapped, as shown in Figure 31 below.

**Figure 31: The advantages of granting credit automatically for equivalent units of competency**



Q2a If credit is granted automatically to equivalent units of competency without the RTO mapping to see if the learning outcomes are the same, what do you think are – a) The advantages of granting credit automatically for equivalent superseded units where the unit has been superseded twice or more and where it is not mapped. Sample size n=18

The other category included the following comments:

*If the unit is equivalent it has been mapped by the training package developer, so the RTO doesn't need to.*

*If linked to a licence or ticket there would be advantages.*

*It will depend on a person's current competency. If he has the paper with relevant qualifications and he's working within the industry, he's up to date with all of the industry requirements.*

*If the qualification exists, all or parts of it should be recognised, the mapping is essential. You can't just erase someone's qualifications; you still have to look at it as a whole.*

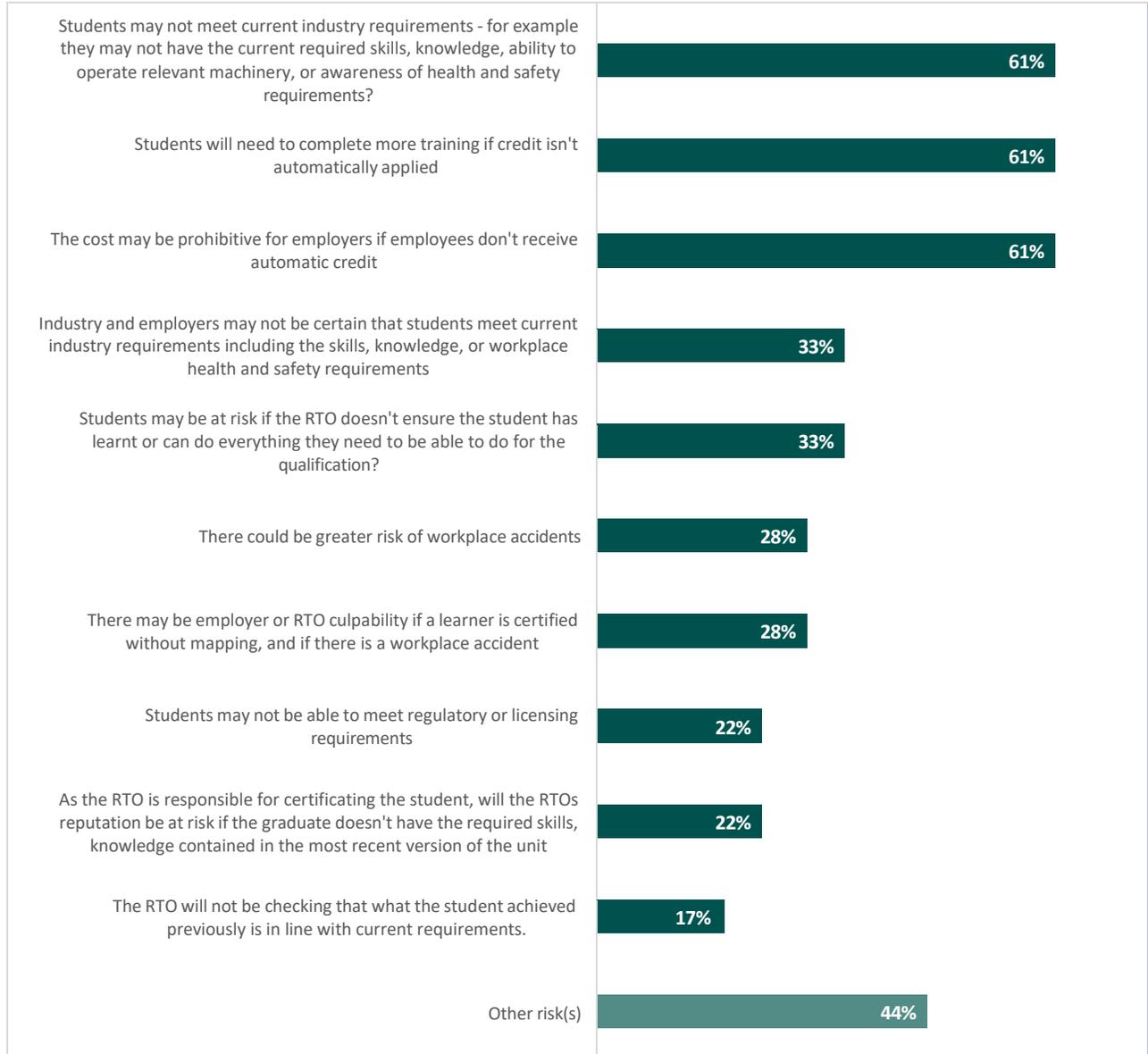
*Advantageous at the moment particularly with skills shortages.*

### 12.2 The risks

The main risk of granting credit automatically for superseded equivalent units where the units have been superseded twice or more and have not been mapped is that students may not meet current industry

requirements. For example, they may not have the current required skills, knowledge, ability to operate relevant machinery or awareness of health and safety requirements. This risk was volunteered without prompting by stakeholders. Other risks mentioned are shown in the following Figure.

**Figure 32: The risks of granting credit automatically for equivalent units of competency**



Q2b What do you think are the risks of granting credit automatically for superseded equivalent units where the unit has been superseded twice or more and where it is not mapped? Sample size n=18

Other issues raised by respondents include:

*The issue is that the training packages can completely change. As an RTO, you wouldn't have a valid judgement on that credit*

*Could be over-regulated red tape where the changes to units of competence are minor word changes*

*Equivalency can be granted even if there are pre-requisite changes, and in my view - that's not equivalent*

*If it's not a technical subject, I cannot see the problem. It's only when you want to do certain technical subjects that require certain rigours. I can't see the operational risk for people operating in the field. We are not a TAFE, so we can only RPL a certain percentage of credits*

*If the gap in the person's knowledge is not picked up. The current technology isn't advanced enough to highlight these gaps*

*If training.gov.au is doing the equivalent, then you shouldn't need to map it*

*It doesn't account for the very reason they may have been updated. You're going in blind.*

---

Some comments made by stakeholders to support the risks that they identify in Figure 32 above include:

*The learner will miss out on significant gaps in knowledge and potential skill and that could be in accordance with industry practice where it has changed. Putting learner at risk and also employer at risk.*

*We have had cases of this and a misunderstanding and misalignment between what the current unit covers compared to a unit two or three iterations ago.*

*Course contents may be quite out of date. Safety changes, there may be a lot of changes and I would be concerned that they are not getting the full information required.*

*Incompetency. We have the EL39 Unit of Competence which has a statement outlining competence requirements, but they still need to provide a CV and we still need to interview them to confirm their experience. Particularly older qualifications.*

*Depending on which unit we are covering, there are a lot of legislative changes that happen all throughout learning, and resources are continually updated. If we are granting a credit automatically, and we have not actually done the mapping correctly we could potentially be putting students at risk in terms of safety. If someone is going on site and training people with knowledge they believe they have, that could be a risk to people on site including a particular person who holds that unit of competency.*

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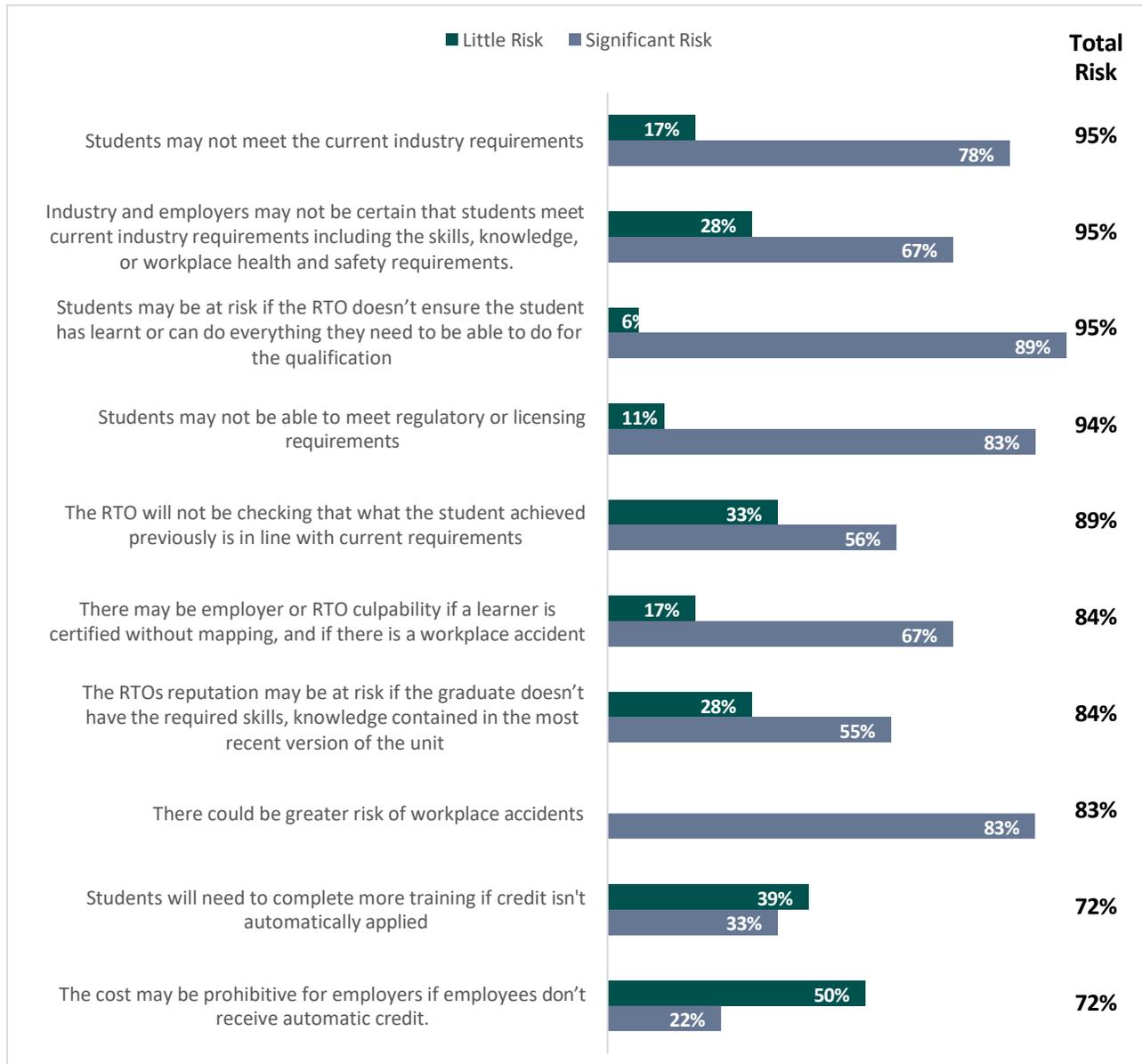
There were no differences in perceived risks by type of stakeholder.

The questionnaire then provided stakeholders with a list of situations concerning the granting of credit for equivalent superseded units where the unit has been superseded twice or more and has not been mapped, that TAC has deemed to be of significant risk. Stakeholders were asked to comment on the degree of risk which they felt was associated with each situation. The four areas of significant risk identified by stakeholders were:

- Students may be at risk if the RTO doesn't ensure that the student has learned or can do everything they need to be able to do for the qualification;
- Students may not be able to meet regulatory or licensing requirements;
- There could be a greater risk of workplace accidents;
- Students may not meet the current industry requirements.

See figure 33 below.

**Figure 33: Promoted evaluation of the risks associated with the automatic granting of credit**



Q2c Here are some factors which have been identified which you may or may not feel are risks associated with automatically granting credit for equivalent superseded units where the unit has been superseded twice or more and where it is not mapped. Sample size n=18

Some stakeholders felt at least some risk associated with the ten circumstances, though views varied on where significant risk lay. Interestingly, there was little consensus of opinion on risk by stakeholder type. Training Councils were the stakeholder group most likely to identify equivalent units which have changed so significantly that they need to be mapped to previous versions.

### 12.3 Equivalent units which need to be mapped

One in three stakeholders identified that within their industry or area of interest, there were equivalent units that had changed so significantly that they felt they needed to be mapped by the RTO to the previous version.

The stakeholders provided the following information on these units:

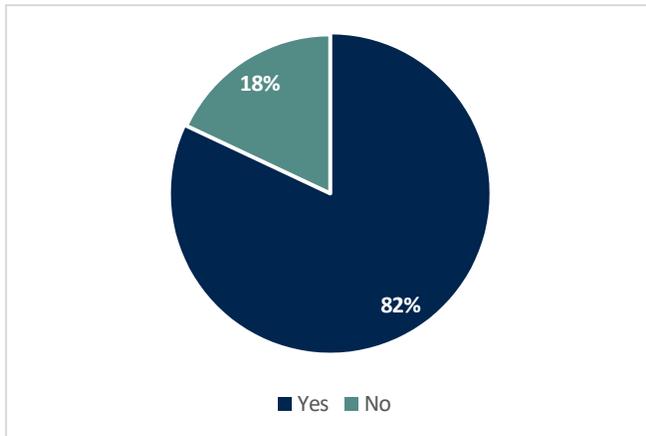
Unit number	Unit name
RIIMPO336D	Conduct belly dump truck operations;
	Early Childhood qualification; Individual support - Aging & Disability
	Certificate IV - Motor vehicle Licence Instructions (certain parts)
	Certificate IV - Workplace Training & Assessment
	CN Licence - High Risk Licence - Driving on Roads
	The whole MEM Training package

### 13.0 TAE Qualifications

Most of the stakeholders were aware of the new TAE 40122 Certificate IV in Training and Assessment qualifications.

Industry regulators were the only group unaware of the new TAE certification, with three out of four training councils unaware of TAE 40122 Certificate IV in Training and Assessment qualifications.

Figure 34: Awareness of the new TAE 40122 qualification

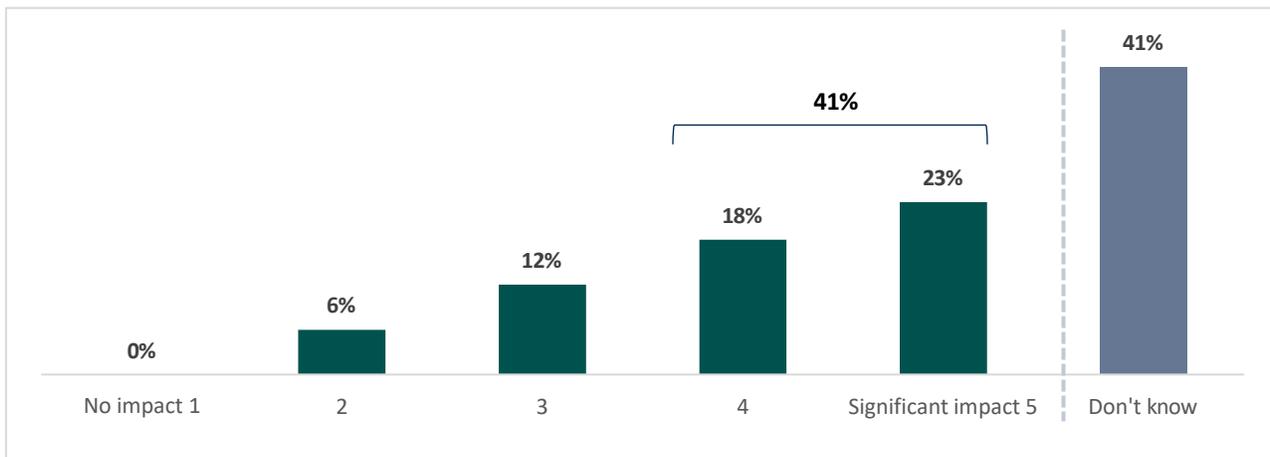


Q4 Are you aware of the new TAE40122 Certificate IV in Training and Assessment qualifications recently released? Sample size n=17; 1 – no response

### 13.1 The impact of TAC's position on credit on trainers and assessors

Overall, 41% of stakeholders felt that TAC’s position on credit would have a fairly significant or very significant impact on trainers and assessors upgrading to the new TAE qualification. Training councils in particular felt that TAC’s position would have a significant impact on trainers and assessors. However, 41% of stakeholders, mainly industry regulators and peak bodies, felt unable to comment about the impact of TAC’s position on credit.

Figure 35: Impact of TAC's position on credit on trainers and assessors



Q5a What impact do you think TAC’s position on credit has on trainers and assessors upgrading to the new TAE qualifications? Sample size n=17

The reasons why TAC's position on credit was felt to have a significant impact on trainers and assessors upgrading to the new TAE qualifications were\*:

- Some trainers and assessors were not qualified enough and may exit the industry at a time when there is a critical shortage (4 respondents);
- The standards for RTOs do not mandate trainers and assessors to upgrade to a new qualification (2 respondents);
- In the construction industry, the instructors are not academic and would struggle with the assessment process and requirements;
- Everyone who holds a TAE needs to be upgraded. You need to be current. TAC's role is to ensure that they do an upgrade and are not using their old qualification;
- It's hard to get the upgrade in a way that doesn't disrupt your current schedule.

Comments included:

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*Unfortunately the sector is 'over' having to upgrade their qualifications. There have been so many changes to the qualifications over the years and unfortunately we are going to see an exodus at a time when we have a critical shortage.*

*There is an existing shortage of trainers within the industry, they are being lured back into operational roles. It is becoming overly cumbersome to retain their currency. There is not much flexibility to factor in the version iterations.*

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Respondents who felt unable to judge the impact of TAC's position on credit commented that:

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*In my industry the qualification was equivalent but many of the units were not equivalent. The biggest thing in my industry was removing the design and development tool from the core units which was a big thing because most of the trainers don't design & develop assessment tool*

*I don't think there would be any RPL (Registered Plumber's License) that would apply at the moment. I believe you have to achieve competency without any recognition by learning.*

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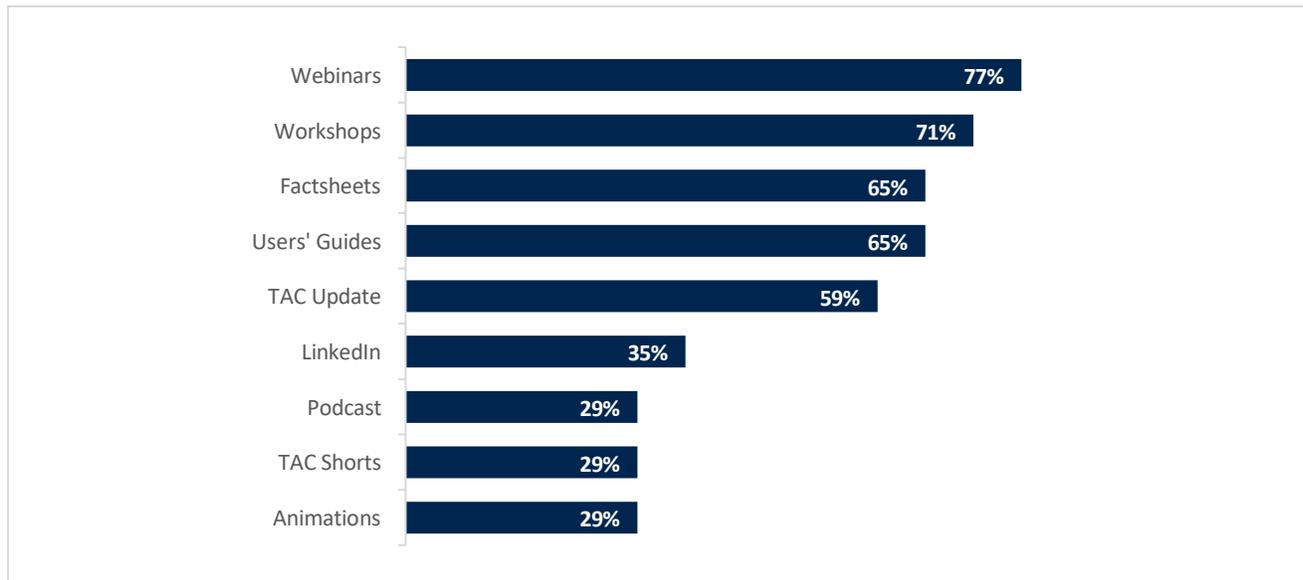
*\*These are verbatim responses which have been grouped into similar themes for ease of interpretation.*

## 14.0 Useful Support Resources

The support resources which stakeholders would find most useful are:

- Webinars
- Workshops
- Factsheets
- Users' guides
- TAC Update.

**Figure 36: Useful support resources**



*Q6a Which of the following support resources would you find useful? Please select as many as apply. Sample size n=17*

Training Councils found factsheets particularly useful (86%), and training councils and industry regulators found the TAC Update particularly useful (71% and 75%, respectively). Peak bodies and industry regulators favored Users' guides (75%).

## 15.0 Other Comments on Credit

Twelve (12) stakeholders made further comments on credit. These comments included:

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*TAC are doing a fantastic job. Not always going for the easiest option but they do go for the quality option.*

*It's an important part of competency-based assessment as you don't want people having to redo qualifications. In some instances, if it is an older unit that is not equivalent, you may be able to 'challenge' test to see if they have the competency. We need to continue with credits.*

*It's complex. Best practice would be if you are going to give someone currency you would want to overlay it with some kind of skills assessment to make sure they are competent. Particularly in mobile plant.*

*We need greater clarification and/or parameters on the changes. For example, if it is a version change, is it going to be minor word changes which doesn't have any significant impact as opposed to fundamental changes.*

*The problem with the credit system is that everyone looks at it slightly differently. TAC and ASQA have different requirements and depending on which one you work with means you may not comply with the other.*

*I would like to see a more streamlined approach. I think a lot of RTOs have their own way of how they do things. I would like to see TAC put something out there more like an umbrella for everyone to use the same process and then as you differ from RTO to RTO, we are all on the same page.*

*They need to understand that just because a training package may be two packages ahead, it doesn't necessarily mean the content is superseded. They need to assess the changes more thoroughly rather than basing it on the packages issued. I feel their intent is more commercial in making the student redo the subject rather than looking at the educational and competency perspective.*

*I understand that TAC will be undertaking what is a need in the future or have already started so maybe advising that particular platform as an officer, that they check they are serving results in realistic outcomes and people are achieving what they are expecting to achieve.*

*As a regulator I have dealt with some RTO's that have not complied with TAC and in some instances, it was the units of competency that were not being met.*

*I think credits need to be well controlled and there needs to be a link back to what the actual credit is for and that it is actually equivalent to what is required at the present time.*

*My view on RPL is that I think we can validate the tests properly if it's done correctly and using the right instruments. Leaving it more or less not accessible due to the way the RTO is audited is not good for anyone because it expels anyone from going through an RPL process. I really support credit transfer, but it has to be done in gathering evidence assessment. I wouldn't be in support of a process that could be manipulated. If done with the proper instrument, I think it would be great for our industry.*

*From my perspective working in a large organisation if units are equivalent, it should just be an automated process.*

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## Appendices

- Appendix 1 - Questionnaire – TAC RTO Credit Consultation Survey 2023
- Appendix 2 - Questionnaire – TAC Stakeholder Credit Survey 2023
- Appendix 3 – Technical - Sampling and Data Collection Specifics
- Appendix 4 - Survey Research: Statistical Tests

## 16.0 Appendices

### 16.1 Appendix 1 - Questionnaire – TAC RTO Credit Consultation Survey 2023

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#### TAC RTO Credit Consultation Survey 2023

QUESTION ACCESS CODE	FIELD ON LIST
ORGANISATIONTYPE	Training Provider Type
LOCATION	Head Office Region
LENGHTOFTIMEINBUS	Length of time the RTO has been in business



LOGO:

BANNER TEXT: TAC RTO Credit Consultation Survey

MOBILE BANNER TEXT: TAC RTO Credit Survey

SURVEY WEB PAGE META TAGS: TAC RTO Credit Consultation Survey 2023

You will have recently received a letter via email from the Training Accreditation Council (the Council/TAC) informing you about a consultation that is being undertaken by TAC on credit; you will also have received some information about TAC's position on RTO requirements when granting credit. We are conducting this survey as TAC is interested in hearing your views on credit for superseded equivalent units of competency.

The survey will take about 8-10 minutes to complete. As this is a consultation, the Council will be informed which RTOs have responded, however will not be able to identify individual RTOs from their answers.

#### HEADER 1: The credit process

Q.1 Do you have a documented process for awarding credit for superseded equivalent units in your organisation?

Yes  O<sub>1</sub>  
No  O<sub>2</sub>

#### ASK ALL

Q.2a Do you: *Please answer for each one*

	YES	NO
Have the credit application form/template.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
Verify the testamur with the awarding RTO.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
Check that the unit is equivalent and immediately superseded and if it is, award credit.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
If unit is superseded twice or more – undertake mapping between unit held by the student and unit applying for credit.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
If successful - record the outcome on your RTO student management system.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
Once mapped if the unit is not considered to align, advise the student of options such as recognition of prior learning (RPL).	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
If the student enrolls, the RTO trains and assesses in the gaps identified between the two units.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
If students have studied at my RTO in a superseded unit that has transitioned, my RTO has a process to implement bulk credit arrangements.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>

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## ASK ALL

Q2b. Any other processes you use? *Please describe in as much detail as possible.*

## OPTIONAL

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Q.3a Do you have pre-prepared mapping processes for superseded equivalent units?

- Yes  O<sub>1</sub>  
 No  O<sub>2</sub>

## ASK IF Q3a=YES

Q.3b Are these pre-prepared mapping processes in place for all superseded equivalent units or only some of them?

- For **all** superseded equivalent units  O<sub>1</sub>  
 For **some** superseded equivalent units  O<sub>2</sub>

## ASK IF Q3a=YES

Q.3c How far back do the mapping processes go?

*If different processes apply for different units, please select all that apply.*

- Only for the immediately superseded equivalent unit  1  
 The superseded unit before that (there is a unit interceding between the current unit and the superseded unit)  2  
 Superseded three times  3  
 Superseded four times  4  
 Superseded five times or more  5

Q.3d Who is responsible for determining credit applications?

*If the person responsible is different for different units, please select all that apply.*

- It's an administration process determined at the time of application  1  
 It's determined by the unit coordinator  2  
 It's determined by the trainer/assessor  3  
 It's determined by a specialist in the area  4  
 It's determined by somebody else: *(Please specify who)*  9

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PAGE 2

HEADER 1: Fees:

Q.4a Is there an application fee for the student when applying for credit?

- Yes  O<sub>1</sub>
- No  O<sub>2</sub>

Q4b Is there a mapping fee for the student where the unit needs to be mapped against previous units?

- Yes  O<sub>1</sub>
- No  O<sub>2</sub>

Q.5 Is there a fee charged for any of the processes that you use?  
Please select each process where a fee is applied?

Check that the unit is equivalent and immediately superseded and if it is, award credit.	<input type="checkbox"/> O <sub>1</sub>
If unit is superseded twice or more – undertake mapping between unit held by the student and unit applying for credit and if it confirms no gaps exist in the training and assessment requirements, award credit.	<input type="checkbox"/> O <sub>2</sub>
Other fees (please type in) .....	<input type="checkbox"/> O <sub>3</sub>
No fees are charged for any aspect of the credit process.	<input type="radio"/> O <sub>9</sub>

Q5a. **FOR EACH OF Q5 1-9 WHERE A FEE IS APPLIED:** Please estimate the dollar amount of the fee charged for the **INSERT RESPONSE(S) SELECTED FROM Q5, USING WORDING BELOW.**

<i>checking that the unit is equivalent and immediately superseded and if it is, award credit.</i>	\$
<i>undertaking mapping between unit held by the student and unit applying for credit (if unit is superseded twice or more) and if it confirms no gaps exist in the training and assessment requirements, award credit.</i>	\$

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**HEADER2:** Thinking back over the past year, that is between January 2022 and December 2022 ....

Q6a1. How many students were granted a credit for a superseded equivalent unit of competency for immediately superseded units? \_\_\_\_\_

Q6a1. How many students were granted a credit for a superseded equivalent unit of competency for units superseded twice or more? \_\_\_\_\_

Q.6b Which units did your RTO issue the most number of credits for in 2022? *Please specify.*

**OPTIONAL**

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PAGE 3

HEADER 1: The Pros and Cons

The Council's position on granting credit to learners for superseded unit of an equivalent level of competency is that...

- RTOs can award credit using the equivalent determination where the unit of competency already obtained by the learner **immediately precedes** the unit for which the credit transfer will be awarded.
- Where an award of credit is sought for a unit of competency that has been superseded twice or more (e.g. there is a unit interceding), then the RTO must conduct a mapping process to confirm no gaps exist in the training and assessment requirements.
- Between the unit already obtained by the learner and the unit which the learner seeks to receive an award of credit.
- Where gaps in the training assessment requirements are identified, no credit can be provided.

(Please use the whole scale)

		Strongly Support	Support	Neither support nor oppose	Oppose	Strongly Oppose	Undecided/ don't know
Q.7a	Do you support or oppose the TAC's position on credit?	<input type="radio"/> 5	<input type="radio"/> 4	<input type="radio"/> 3	<input type="radio"/> 2	<input type="radio"/> 1	<input type="radio"/> 9

Q.7b Why do you say that? (Please explain in as much as you can)

PROGRAM AS OPTIONAL

.....

.....

.....

HEADER 2: If a credit is granted automatically to equivalent units of competency without the requirement for RTOs to map to ensure learning outcomes are the same ...

Q8a. What do you think are the advantages of granting credit automatically for equivalent superseded units where the unit has been superseded twice or more and where it is not mapped? (Please explain in as much detail as you can)

.....

.....

.....

Q8b. What do you think are the risks of granting credit automatically for superseded equivalent unit of confidence where the unit has been superseded twice or more and where it is not mapped? (Please explain in as much detail as you can)

.....

.....

.....

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PAGE 4

Q8c. Here are some factors which have been identified which you may or may not feel are risks associated with automatically granting credit. *Please rate the degree of risk you feel is associated with each of these statements.*

	No Risk	Little Risk	Significant Risk
A student can seek automatic credit for a unit from 10 years ago which may still be classed as equivalent.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>	<input type="radio"/> O <sub>3</sub>
The student’s skills for that unit may not be current and the student could graduate without having the skills and knowledge industry requires.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>	<input type="radio"/> O <sub>3</sub>
As my RTO is awarding the qualification based on credit, my RTO would need to have the confidence that the person has the skills and knowledge required by industry in the current unit/qualification.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>	<input type="radio"/> O <sub>3</sub>
If credit is granted automatically, and there are differences in the unit, the RTO’s reputation could be compromised if it emerges the student doesn’t have the most update skills and knowledge, workplace safety required to do the job.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>	<input type="radio"/> O <sub>3</sub>
A unit might be deemed equivalent in workplace outcomes but there may be significant differences in learning outcomes and assessment requirements, which would only be identified by mapping.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>	<input type="radio"/> O <sub>3</sub>

Q.9a Within your scope of delivery, are there any units which have changed so significantly that you feel they need to be mapped to previous versions?

- Yes  O<sub>1</sub>
- No  O<sub>2</sub>

ASK IF Q9a=YES

Q9b. Please give us examples of current units which you feel should have previous units mapped against them. *Please type in the unit name and number, if you have it, for up to 5 examples.*

OPTIONAL

Unit name	Unit number

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PAGE 5

Q.10. What do you feel the **industry and employers** that you work with see as the advantages of the automatic application of credit? *Please select all that you feel apply and add any others.*

Advantages	
Easy to upgrade employees to the most recent unit	<input type="checkbox"/> <sub>1</sub>
It is easier for national employers as it provides consistency across the country between VET regulators	<input type="checkbox"/> <sub>2</sub>
The process is quick to do	<input type="checkbox"/> <sub>3</sub>
The process is cheaper than having to potentially redo the course	<input type="checkbox"/> <sub>4</sub>
Able to meet industry needs quickly to address skill shortage areas	<input type="checkbox"/> <sub>5</sub>
Anything else? <i>(Please specify)</i>	<input type="checkbox"/> <sub>9</sub>

Q.11. What do you feel the **industry and employers** that you work with see as the risks: *Please select all that you feel apply and add any others.*

Risks	
Student may not meet the current industry requirements – for example they may not have the current required skills, knowledge, be able to operate relevant machinery, or awareness of health and safety requirements.	<input type="checkbox"/> <sub>1</sub>
Students will need to complete more training if credit isn't automatically applied.	<input type="checkbox"/> <sub>2</sub>
The cost may be prohibitive for employers if employees don't receive automatic credit.	<input type="checkbox"/> <sub>3</sub>
Industry and employers need their employees to know the most current information and credited units may not offer this.	<input type="checkbox"/> <sub>4</sub>
Students may not be able to meet regulatory or licensing requirements	<input type="checkbox"/> <sub>5</sub>
There could be greater risk of workplace accidents.	<input type="checkbox"/> <sub>6</sub>
There may be employer or RTO culpability if a learner is certified without mapping, and if there is a workplace accident	<input type="checkbox"/> <sub>7</sub>
The RTOs reputation may be at risk if the graduate doesn't have the required skills and knowledge contained in the most recent version of the unit.	<input type="checkbox"/> <sub>8</sub>
Anything else? <i>(Please specify)</i>	<input type="checkbox"/> <sub>9</sub>

Q.12. What do you feel are the positive impacts **on students** as a result of the automatic application of credit? *Please select all that you feel apply and add any others.*

The positive impacts	
Faster credit process	<input type="checkbox"/> <sub>1</sub>
Won't have to complete gap training	<input type="checkbox"/> <sub>2</sub>
Won't have to pay for gap training	<input type="checkbox"/> <sub>3</sub>
Gets the latest unit with no additional effort or cost	<input type="checkbox"/> <sub>4</sub>
	<input type="checkbox"/> <sub>5</sub>
Able to commence work in industry quicker (particularly in skill shortage areas)	<input type="checkbox"/> <sub>6</sub>
Other? <i>(Please specify)</i>	<input type="checkbox"/> <sub>9</sub>



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Q16. Is there anything else that you would like to comment about in relation to credit?

OPTIONAL QUESTION

.....

.....

.....

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HEADER 2: **Company profile**

ASK ALL

Q.17 How many people does your RTO employ, including yourself?

1-5 people	<input type="radio"/>	O <sub>1</sub>
6-10 people	<input type="radio"/>	O <sub>2</sub>
11-20 people	<input type="radio"/>	O <sub>3</sub>
More than 20 people	<input type="radio"/>	O <sub>4</sub>

Q.18. How many students did you enrol during the 12 month period from January 2022 to December 2022?

0-99 students	<input type="radio"/>	O <sub>1</sub>
100-249 students	<input type="radio"/>	O <sub>2</sub>
250-499 students	<input type="radio"/>	O <sub>3</sub>
500-999 students	<input type="radio"/>	O <sub>4</sub>
1,000 or more students	<input type="radio"/>	O <sub>5</sub>

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Please press the submit button to send in your responses.

Thank you for participating in this survey. The information you have provided will be kept confidential and de-identified and only the aggregate results will be provided to TAC.

REDIRECT ON SUBMIT TO: <https://www.tac.wa.gov.au/Pages/default.aspx>

LOAD UP FROM MASTER LIST (PROVIDED BY TAC SECRETARIAT):

Q.14 TRAINING PROVIDER TYPE

Q.15 ORGANISATION LOCATION: METRO/ COUNTRY

Q.16 LENGTH OF TIME THE RTO HAS BEEN IN BUSINESS

## 16.2 Appendix 2 - Questionnaire – TAC Stakeholder Credit Survey

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### TAC Stakeholder Credit Survey 2023

Good morning; my name is .....from Market Research Australia.

You will have recently received a letter via email from the Training Accreditation Council (TAC) informing you about a consultation that is being undertaken by TAC on credit; you will also have received some information about TAC's position on RTO requirements when granting credit for superseded equivalent units of competency. We are interested in your views on the impact of this position in your area.

The survey will take about 10 minutes to complete by telephone. As this is a consultation, the Council will be informed which Stakeholders have responded, however will not be able to identify individual Stakeholders from their answers.

Can you confirm that you are the correct person in your organisation to talk to about TAC and its policies?

If not, ask for the correct person and contact them.

Q.1 Firstly, we would like to ensure that when we talk about credit for units of competency, we are all thinking about it in the same way. I would like to start by reading out a series of definitions of credit and ask that you tell me which ones you believe to be correct? *Interviewer read each one and the respondent will need to say yes or no as there are too many for him to select the most appropriate ones.*

Definitions of credit		Yes	No
1	Credit is a way to recognise formal learning a student has previously achieved.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
2	For credit to be granted – the RTO must see evidence of AQF <sup>1</sup> certification.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
3	The documentary evidence of a course completed could include: <ul style="list-style-type: none"> <li><input type="radio"/> an authenticated VET Testamur</li> <li><input type="radio"/> the original statement of attainment</li> <li><input type="radio"/> transcript of results</li> <li><input type="radio"/> Certificate.</li> </ul>	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
4	The RTO granting the credit must verify the documents to ensure they are authentic.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
5	Credit applies when the unit of competency has the same unit code and title.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
6	Credit applies when the unit of competency is equivalent to the earlier version.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
7	Credit should only be granted after the equivalent unit of competency has been mapped to the earlier version.	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
8	Credit should be granted for an older equivalent unit no matter how long ago the student achieved the original unit	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>
9	Credit should be granted for an older equivalent unit no matter how many versions of the unit have been released in the intervening period since the	<input type="radio"/> O <sub>1</sub>	<input type="radio"/> O <sub>2</sub>

<sup>1</sup> For your reference, AQF is the **Australian Qualifications Framework (AQF)**  
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student originally achieved it (i.e. there have been two or more iterations of the unit over the period from when they first achieved it).

- 10 It's an administrative process by the RTO – the student doesn't need to do anything  <sub>1</sub>  <sub>2</sub>
- 11 Do you have a different definition?  <sub>1</sub>  <sub>2</sub>  
(Please explain)

Q.2 If credit is granted automatically to equivalent units of competency without the RTO mapping to see if the learning outcomes are the same, what do you think are:

- a) The advantages of granting credit automatically for equivalent superseded units where the unit has been superseded twice or more and where it is not mapped.

*(Please probe fully do not read out, or prompt, multiple response)*

- Easy to upgrade employees to the most recent unit and/or qualification  <sub>1</sub>
- National employer's staff will be treated the same no matter where the employer is based – consistent across the country between VET regulators  <sub>2</sub>
- Means that what the student has previously achieved (irrespective of when it was achieved) is recognised  <sub>3</sub>
- The process is quick to do  <sub>4</sub>
- Able to meet industry needs quickly to address skill shortage areas  <sub>5</sub>
- Other: *Please write in*  <sub>9</sub>

- b) What do you think are the risks of granting credit automatically for superseded equivalent units where the unit has been superseded twice or more and where it is not mapped?

*(Please probe fully and do not read out or prompt, multiple response)*

- Students may not meet current industry requirements – for example they may not have the current required skills, knowledge, ability to operate relevant machinery, or awareness of health and safety requirements?  <sub>1</sub>
- Students will need to complete more training if credit isn't automatically applied.  <sub>2</sub>
- The cost may be prohibitive for employers if employees don't receive automatic credit.  <sub>3</sub>

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- Industry and employers may not be certain that students meet current industry requirements including the skills, knowledge, or workplace health and safety requirements. 4
- Students may not be able to meet regulatory or licensing requirements. 5
- There could be greater risk of workplace accidents. 6
- There may be employer or RTO culpability if a learner is certified without mapping, and if there is a workplace accident. 7
- As the RTO is responsible for certificating the student, will the RTOs reputation be at risk if the graduate doesn't have the required skills, knowledge contained in the most recent version of the unit. 8
- Students may be at risk if the RTO doesn't ensure the student has learnt or can do everything they need to be able to do for the qualification? 9
- The RTO will not be checking that what the student achieved previously is in line with current requirements. 10
- Other risk(s)? *(Please write in)* 99

c) Here are some factors which have been identified which you may or may not feel are risks associated with automatically granting credit for equivalent superseded units where the unit has been superseded twice or more and where it is not mapped.

*Read out each statement and rate*

	No risk	Little Risk	Significant Risk
Student may not meet the current industry requirements – for example they may not have the required skills, knowledge, able to operate relevant machinery, or awareness of health and safety requirements.	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3
Students will need to complete more training if credit isn't automatically applied.	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3
The cost may be prohibitive for employers if employees don't receive automatic credit.	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3
Industry and employers may not be certain that students meet current industry requirements including the skills, knowledge, or workplace health and safety requirements.	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3
Students may not be able to meet regulatory or licensing requirements.	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3
There could be greater risk of workplace accidents.	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3

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There may be employer or RTO culpability if a learner is certified without mapping, and if there is a workplace accident.  O<sub>1</sub>  O<sub>2</sub>  O<sub>3</sub>

The RTOs reputation may be at risk if the graduate doesn't have the required skills, knowledge contained in the most recent version of the unit.  O<sub>1</sub>  O<sub>2</sub>  O<sub>3</sub>

Students may be at risk if the RTO doesn't ensure the student has learnt or can do everything they need to be able to do for the qualification?  O<sub>1</sub>  O<sub>2</sub>  O<sub>3</sub>

The RTO will not be checking that what the student achieved previously is in line with current requirements.  O<sub>1</sub>  O<sub>2</sub>  O<sub>3</sub>

Q.3a Within your industry or area of interest, are there any equivalent units which have changed so significantly that you feel need to be mapped by the RTO to the previous versions?

Yes  O<sub>1</sub>  
 No  O<sub>2</sub> [Go to Q4](#)

ASK IF Q3a = YES

Q.3b Within your area of interest are there any current units which you feel should have previous equivalent superseded units mapped against them due to the significant changes between the units? Please give me the unit code and name. *If don't know units or codes write in 'don't know'*

Unit code	Unit name

Q4. Are you aware of the new TAE40122 Certificate IV in Training and Assessment qualifications recently released?

Yes  O<sub>1</sub>  
 No  O<sub>2</sub> [Go to Q6](#)

ASK Q5a IF Q4 = (1)

(Please use the whole scale)

Q.5a What impact do you think TAC's position on credit has on trainers and assessors upgrading to the new TAE qualifications?  O<sub>1</sub>  O<sub>2</sub>  O<sub>3</sub>  O<sub>4</sub>  O<sub>5</sub>  O<sub>9</sub>

No impact Significant impact Don't know

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Q.5b Why do you say this? *(Please probe do not prompt)*

- No impact - Most of the units are not equivalent. <sub>1</sub>
- The Standards for RTOs don't mandate trainers and assessors need to upgrade to the new qualification <sub>2</sub>
- Other: *Please probe and write in* <sub>9</sub>

Q.6a Which of the following support resources would you find useful? *(Read out each, it is multiple response)*

Support resources for credit	
Workshops	<input type="checkbox"/> <sub>1</sub>
Webinars	<input type="checkbox"/> <sub>2</sub>
Podcast	<input type="checkbox"/> <sub>3</sub>
TAC Shorts	<input type="checkbox"/> <sub>4</sub>
Factsheets	<input type="checkbox"/> <sub>5</sub>
Animations	<input type="checkbox"/> <sub>6</sub>
TAC Update	<input type="checkbox"/> <sub>7</sub>
Users' Guides	<input type="checkbox"/> <sub>8</sub>
LinkedIn	<input type="checkbox"/> <sub>9</sub>

Q.6b Is there anything else that you would like to comment about in relation to credit?

No/ DK <sub>99</sub>

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THANK YOU for participating in this consultation about the application of credit for superseded equivalent units of competency. The Council greatly appreciates the time and effort which you have given to providing your views.

[STAKEHOLDER TYPE TO BE ADDED FROM THE STAKEHOLDER LIST]

### 16.3 Appendix 3 – Technical - Sampling and Data Collection Specifics

Component	Details
<b>Project Management Team</b>	
Research Solutions contact	Nicky Munro
Client contact	Grazia Stewart
Field company	Market Research Australia
Field company credentials	ISO 20252 equivalent
<b>Research Methodology</b>	
Data collection method <ul style="list-style-type: none"> <li>• RTOs</li> <li>• Stakeholders</li> </ul>	Online Telephone
<b>Sampling Methodology</b>	
Target population for survey	RTOs and stakeholders
Description of sampling frame	Lists of registered organisations and stakeholders
Source of sampling frame	TAC
List checked for duplicate entries	Where lists are provided by clients, duplications have been removed – 9 duplicates removed from the RTO list. Some replacements were provided for the stakeholder list.
Was an Access Panel used?	No
Methods used / appropriateness of the sample fit for purpose	The method of online surveys of RTOs may need to be reviewed for subsequent surveys as the response rate has been declining in recent years and may need to be boosted by a telephone surveys. The telephone survey of stakeholders worked well.
Was the sample blended (derived from multiple sources or interviews conducted across multiple modes)?	No
Sampling technique	The sample was a census of organisations and contacts, and all were invited to participate.
Was the sample quota'd?	No
Planned sample size	As many as would reply
Were there any problems encountered in sample selection?	No
Sample size achieved	RTOs n= 53 Stakeholders n=18
Do participants need to be approached again (for a future project)?	No
<b>Fieldwork</b>	
Briefing Method	The stakeholder telephone survey was briefed in person, with written briefing notes provided
Pilot study date(s)	A slow start to the survey to check for problems.

Component	Details
Changes made as result of pilot	None
Research participant support	FOR SELF ADMINISTERED Participants were provided with the contact details of the project manager and the client INTERVIEWER ADMINISTERED The contact details of the project manager were available to participants on request
Screeners, questionnaire and /or discussion guide appended to report	Yes
Incentives or methods of engagement used for participants	None
Was the product/incentive provided by the client?	No
Any issues arising in the survey?	No
Survey Procedure for CATI:	
• Survey dates	17.3.23 to 14.4.23
• Questionnaire length / administration time	11 minutes
• Number of interviewers used	1
• Times of day interviews took place	Mon-Fri business hours
• No of call backs before number replaced	Up to 8, at least 3-4 hours apart and at different shift days
Survey Procedure for Online:	
• Survey dates	20.03.23 – 5. 04.2023
• Questionnaire length / administration time	It is not possible to calculate administration time as no respondents, completed the survey in one sitting, most stopped and started the survey, some left it open. Possibly seeking comments from colleagues or seeking information on courses to complete the questionnaire. The completion time varied between 10 minutes and two and a half hours.
• Administration process	Email of introduction from TAC Personalised email sent from Research Solutions embedded with unique link embedded
• Number of reminders to non-respondents	Two reminders to non-respondents at the beginning of the second and third weeks
<b>Data Collection Outcomes:</b>	
RTO survey	30% of RTOs
Stakeholders survey	72%
CATI research participant contact outcomes:	
• Interviews	18

Component	Details
<ul style="list-style-type: none"> <li>Final result - not available / away for duration of study / no response</li> </ul>	3
<ul style="list-style-type: none"> <li>Refusals preferred to talk to TAC directly</li> </ul>	2
Online survey by email invitation research participant contact outcomes (note below or delete):	
<ul style="list-style-type: none"> <li>Number invited to participate</li> </ul>	270 from 120 RTOs
<ul style="list-style-type: none"> <li>Completed survey responses</li> </ul>	53
<ul style="list-style-type: none"> <li>Bounced emails</li> </ul>	4
<ul style="list-style-type: none"> <li>Partially completed responses</li> </ul>	excluded from survey response dataset
<ul style="list-style-type: none"> <li>Outed out of all online surveys</li> </ul>	2
<ul style="list-style-type: none"> <li>Unavailable / away for the duration</li> </ul>	6
Was a router or similar method used?	
	No
Overall sampling error	
	+ %
Validation procedures:	
	Waived due to busy, reluctant sample; multiple calls to secure interviews; further calling may be construed as harassment.
Validity and Reliability Issues including:	
<ul style="list-style-type: none"> <li>How well the sample fitted the sampling frame</li> </ul>	Well
<ul style="list-style-type: none"> <li>Methods which may produce bias in participant selection</li> </ul>	Self-completion survey with 30% response rate may produce a bias towards those who have strong views on the issue.
<ul style="list-style-type: none"> <li>Possible sampling errors and how well the sample can generalise to the population</li> </ul>	This was a consultation exercise so generalising to the population was less critical than providing the opportunity for RTOs and stakeholders to consult on the issue of credit.
<ul style="list-style-type: none"> <li>Third party data to access any sample bias</li> </ul>	TAC has the samples so that the study can be replicated if required
<b>Data Coding, Analysis and Data File Treatment</b>	
Question order bias	
	None
Data coding	
	Procedure involves: <ul style="list-style-type: none"> <li>Review of first 50 questionnaires (or similar) to develop coding sheets based on common responses</li> <li>Additional codes created when more than 2% of the sample record common response</li> <li>Approval of coding sheet by Research Solutions Project Manager</li> <li>Validation of coding has been undertaken of 5% of the coded data.</li> </ul>

Component	Details
Consistency checks	<ul style="list-style-type: none"> <li>• Preliminary data file checked by Project Manager using SPSS: <ul style="list-style-type: none"> <li>○ Frequency counts</li> <li>○ Relevant cross tabulations</li> </ul> </li> <li>• Data outside the range/duplicates or abnormalities investigated with Field Company prior to coding and analysis</li> </ul> <p>Responses checked for:</p> <ul style="list-style-type: none"> <li>• Appropriate responses to open ended questions</li> <li>• Low probability / fictitious responses</li> <li>• Inconsistent responses on batteries</li> <li>• Pattern of responses: Flatlining or random responding</li> <li>• Length of time to complete the survey</li> <li>• High % of unanswered questions / key questions not answered</li> <li>• High % of don't know or refused questions</li> </ul>
Data checked for duplications	<ul style="list-style-type: none"> <li>• Contact details checked name &amp; phone no.</li> <li>• Demographic profile</li> <li>• Open ended comments reviewed</li> </ul>
Were any duplications identified?	No
Treatment of missing data	<ul style="list-style-type: none"> <li>• Excluded from analysis and/or noted where relevant</li> <li>• Individual cases with excessive missing data excluded from sample</li> </ul>
Was sample weighted?	No
Any estimating or imputation procedures used	No
Methods of statistical analysis	<ul style="list-style-type: none"> <li>• Frequency counts</li> <li>• Descriptive statistics</li> <li>• Cross tabulations</li> </ul> <p><i>See Survey Research Appendix: Data reduction and data modelling techniques</i></p>
Statistical tests used	<i>See Survey Research Appendix: Statistical tests</i>
Data file provided to client	On request
De-identified data files retained	Kept for 5 years
<b>This project has been undertaken with compliance with ISO 20252:2019</b>	

## 16.4 Appendix 4 - Survey Research: Statistical Tests

<b>Test:</b>	<b>T-Test</b>
Use:	To determine if the means of a variable in two independent or two dependent samples are significantly different.
Data Assumptions:	<ul style="list-style-type: none"> <li>• Measure being tested is normally distributed within the two samples.</li> <li>• Data must be interval or ratio.</li> <li>• Variance of measure being tested is roughly similar (homogeneity of variance).</li> <li>• Appropriate version of the test chosen for independent or dependent samples.</li> </ul>
Test Measure / Cut-off Criterion:	<p><math>p \leq 0.05</math>            i.e. the difference between two groups has only a 5% probability of occurring by chance alone</p>
Issues to be aware of:	<p>The result should be both statistically significant and clinically or tactically or strategically significant. Be mindful of statistically significant differences where:</p> <ol style="list-style-type: none"> <li>1. The sample sizes are very large.</li> <li>2. Scores within the groups are very similar (i.e. the groups have small standard deviations)</li> </ol>

<b>Test:</b>	<b>Chi Square (Pearson's chi-square)</b>
Use:	To determine if two variables are related by more than chance alone.
Data Assumptions:	<ul style="list-style-type: none"> <li>• Data is from a random sample.</li> <li>• Data must be nominal, ordinal or interval.</li> <li>• Sufficiently large sample (absolute minimum <math>n=30</math>) &amp; adequate cell sizes (<math>n=10+</math>)</li> <li>• Observations must be independent.</li> <li>• Observations must have the same underlying distribution.</li> <li>• Data is unweighted</li> </ul>
Test Measure / Cut-off Criterion:	$p \leq 0.5$

<b>Test:</b>	<b>False Discovery Rate</b>
Use:	A multiple comparison correction technique used to adjust the results of tests of statistical significance to reduce the chance of finding results to be significant when there are no actual differences.
Data Assumptions:	The data assumptions are relevant to the original tests of significance being "adjusted"
Test Measure / Cut-off Criterion:	$q \leq 0.5$