

‘I see nothing has changed’: reshaping practitioner concerns about institutional language

Lauri Grace, Faculty of Education, Deakin University

Abstract

My PhD research revealed widespread disquiet that Training Packages are typically written in a complex and abstract institutional language form that excludes all but knowledgeable readers. Many practitioners and participants struggle to understand the units of competency they are trying to work with. In a national VET system which claims that decision making and policy development are based on consultation and research, how can this disquiet go unnoticed? This paper examines a sequence of five texts drawn from the review and development of the Training Package qualifications for VET practitioners. It argues that the impact of an excluding language form has been recognised and then subsumed in two separate review and development processes. When the first competency standards for workplace trainers and assessors were reviewed in 1997 much of the target population was found to lack awareness, familiarity, experience or expertise in using the standards. Yet the review is reported to have concluded that most users were satisfied with the language used in those standards. When the *Training Package for Assessment and Workplace Training* was reviewed in 2001 the complex language was one of the most common issues raised in unprecedented consultations and was identified as a significant accessibility issue. Yet the *Training and Assessment Training Package* responded by entrenching the use of this language as a compulsory assessable requirement and suggesting that individuals who have difficulty with the language may require training to improve their own (presumed deficient) language and literacy skills. Practitioner input was ‘written down’ but not ‘taken up’. The paper concludes that the concerns expressed by practitioners exposed to public critique fundamental issues about a Training Package that was a ‘lynchpin’ of the VET system and a key component of the ‘rules of the VET game’. But the concerns were reshaped and redefined in a process that was aligned to national VET policy rather than to local needs.

Introduction

The analysis presented in this paper arose from a PhD research project which set out to explore the contrast between the complex language of national Training Packages and the vernacular of local workplaces in which these texts operate. Within the context of a broader study, the paper uses extracts from a sequence of five VET texts to explore VET practitioners’ attempts to challenge the use of complex and excluding language in a particular Training Package. The analysis explores how practitioners are positioned in VET decision making and policy development, and it highlights the contradictions between national rhetoric of consultation and a record of official decision making in which the voices of participants and practitioners are silenced.

Research Method

Institutional ethnography provided the conceptual and methodological framework for my PhD project. Introduced by Canadian sociologist Dorothy Smith (1990a, 1990b, 1999), institutional ethnography argues that power in contemporary societies is

pervasively structured through texts that actively organise and coordinate local activities. An institutional ethnography study starts ‘with a sense of problem, of something going on, some disquiet, and of something here that could be explicated’ (Smith, D.E. 1999, p.9). It identifies an area of local practice and asks ‘what is happening here?’ explicating how organisations take up and activate ruling concepts as they engage with and implement ruling texts (Campbell 2003).

My study had its starting point in practitioner disquiet about the use of a complex and excluding language form in national VET texts, and it generated two levels of data. Interviews with VET practitioners and participants involved in workplace learning and assessment provided entry into local sites in which Training Packages are activated. Examination of texts drawn from the vast library of official VET reports, policy statements, procedural advice and practice guidelines revealed how those local sites are coordinated and connected to national government agendas. Drawing on the literature of institutional ethnography, the analysis presented in this paper has been informed by Dorothy Smith’s examination of two sequences of texts in which issues raised in one text were subsumed by a later text that provided an alternative account of the events described (Smith, D.E. 1990b, pp.120-158; 1999, pp.195-223). In both cases Smith took texts that had originally occurred in a definite sequence, laid them side by side, and undertook an analysis moving back and forth between them.

The paper explores extracts from five texts that were developed by different authors, for different purposes, and at different stages of the review of the *Training Package for Assessment and Workplace Training [BSZ98]* and the development of the *Training and Assessment Training Package [TAA04]*. As a VET practitioner I actively participated in consultations as part of this review and development process. I was particularly interested in the way language issues were being addressed, and I downloaded a number of key texts that were made available on the Internet as part of the consultation process. Issues relating to the use of VET institutional language arose at each stage of the review and development process but concerns expressed by practitioners were reshaped, pre-empted and overridden in the official ‘institutional account’ (Smith, D.E. 1990b, p.212). As a participant in the process I was aware that the *TAA04* Training Package as finally endorsed was a significant disappointment for those of us who had challenged the use of institutional language. But it was only as I laid the texts side by side and compared the approach each took to issues of language that I realised the extent to which concerns that had been clearly expressed throughout the consultations were reshaped and overridden in official responses.

I also realised that I had what may be a unique opportunity to explore this process. The texts that I downloaded as a participant in the consultations are no longer available on the Internet. The only text now available is the *Training and Assessment Training Package*. When this Training Package entered ‘textual time’ as a fully worked up account the traces of its development process were obliterated (Smith, D.E. 1990a, p.74). The *sequence* that renders the reshaping process visible no longer exists. The language issues consistently expressed in consultations have not only dropped off the agenda, the public record no longer contains any evidence that they were raised.

Findings and Discussion

Text 1: Review of the national competency standards for VET practitioners

The first national competency standards for workplace trainers were endorsed in 1992 followed by standards for assessors in 1993 (NAWT 2001, pp.21-24). Prior to 1996 competency standards and qualifications were separate but related texts. Competency standards were developed and endorsed at national level, and Registered Training Organisations (RTOs) used them as the basis for locally developed ‘accredited courses’ leading to VET qualifications. In 1996 Training Packages brought competency standards and qualifications together in a single national text for each industry. In 1997 the national competency standards for workplace trainers and assessors were reviewed as part of the development of the first Training Package qualifications for VET practitioners (NAWT 2001, p.25).

While my attempts to access a copy of the review report were unsuccessful, citations appear in a later text. The 1997 review is directly quoted as stating that:

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

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

Text 2: Review of the BSZ98 Training Package

The *Training Package for Assessment and Workplace Training* was endorsed in 1998. Training Packages in general have been described as reflecting ‘the rules of the VET game’ (Schofield & McDonald 2004, p.8). This particular Training Package was described as ‘a lynchpin of the current VET system’ because it not only provided the competency standards for VET practitioners, it was also seen as ‘providing the structural supports for national quality assurance arrangements of RTOs’ (NAWT 2001, p.1). The special status of the *Certificate IV in Assessment and Workplace Training* qualification is inferred in the way that VET practitioners throughout my study rarely used its full title, typically referring to it as ‘the Certificate IV’ or simply ‘the Cert IV’. There are many Certificate IV qualifications available in VET but only one of these is commonly referred to and recognised as ‘*the Cert IV*’.

The *BSZ98 Training Package* was formally reviewed in 2001. Reviewing this Training Package and then developing, validating and obtaining endorsement for the *Training and Assessment Training Package* spanned four years, beginning with the first round of review consultations in October 2000 and concluding with the endorsement of the *TAA04* in October 2004 (ANTA 2004a, title page; NAWT 2001, app.2). The consultations undertaken as part of the initial review were unprecedented. Approximately 1000 people including VET practitioners, managers, consultants and personnel from VET authorities participated through face-to-face consultations or

questionnaires, and there was an ‘extraordinary level of unanimity from workshop to workshop in identifying key issues, needs and gaps’ (NAWT 2001, p.13).

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

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

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

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

The complexity and inconsistency of language creates a perception that the Training Package is not user-friendly. It also represents a significant accessibility issue that will need to be addressed. A common suggestion by workshop participants is to rewrite the units in plain English. (NAWT 2001, p.44)

While acknowledging a need to maintain ‘essential technical language’, the review formally recommended that ‘the existing units of competency be thoroughly edited and revised in plain English’ (NAWT 2001, p.v). This report indicates that concerns about language had been written down. An examination of later public texts that emerged from the development of the *TAA04* Training Package provides little indication that the concerns were taken up.

Text 3: Public comments on the draft TAA04 Training Package

The development of the *Training and Assessment Training Package* involved functional analysis workshops, research, face-to-face consultations, and input provided online (BSTA 2004, p.16). In addition, VET authorities had direct input to the development process. A teleconference between national, state and territory VET authorities reviewed the recommendations arising from the review of *BSZ98* and agreed to proceed with development of the new Training Package ‘in line with agreed and amended recommendations and actions’ (BSTA 2004, p.15). As there is no public record of the official response to each of the recommendations made in the 2001 review report, it is not possible to establish whether the particular recommendation to edit the units in plain English was agreed, amended or even rejected. An examination of public documents relating to the new Training Package reveals no further reference to this recommendation in any official text after this point.

The development of *TAA04* was overseen by a steering committee that included representatives of public and private RTOs, practitioner groups, higher education authorities, Industry Training Bodies, a State Training Authority representative, and ANTA, as is normal practice in Training Package development (ANTA 2004b, pt.1, ch.2, p.6; BSTA 2004, pp.12-13). In a significant departure from normal practice the development was also overseen by a reference group ‘comprising senior representatives of the Commonwealth, States and Territories ... to provide a focal point for State, Territory and Commonwealth input into the Training Package development and related issues’ (BSTA 2004, p.15).

The second draft of the *Training and Assessment Training Package* was made available for comment on an Internet site set up for this purpose (BSTA & NAWT 2002). The following examples are drawn from a number of public comments posted on that site addressing the language used in the draft Training Package.

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

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

These comments not only confirm ongoing practitioner concerns about the use of complex and excluding language, they also reveal an emerging concern that issues that had been raised in consultations had not been effectively responded to.

Text 4: Endorsement submission for TAA04

When the *Training and Assessment Training Package* was initially submitted for endorsement in June 2004 the endorsement submission identified the target audience as 'persons and organisations involved in the provision of training and assessment services ... both recognised training and assessment and non-recognised training such as in-house or product based training' (BSTA 2004, p.3). This gave the Training Package coverage extending beyond the full diversity of the national VET sector.

The endorsement submission described the development process as 'probably the most extensive iterative development and consultative process of any Training Package' (BSTA 2004, p.4). It also described the State and Territories Reference Group as 'a pivotal part of the development process':

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

On issues of language, the endorsement submission stated that:

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

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

Text 5: Assessment guidelines and units of competency TAA04

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

2.1 The *qualifications framework* of the selected Training Packages and/or accredited courses, including the *packaging rules*, is read and interpreted accurately

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

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

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

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

The use of italics within performance criteria indicates that further information about the italicised terms is provided elsewhere in the unit. The unit ‘work effectively in vocational education and training’ elaborates on performance criterion 1.6 as follows:

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

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

The formal requirement that participants demonstrate the ability to use the complex language of Training Packages is also embedded in the *TAA04* assessment guidelines:

English language, literacy and other skill requirements

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

In particular, advice about the underlying level of English language and literacy required to meet the outcomes of Training and Assessment Training Package (TAA04) units must be made clear prior to commencement of the learning and/or assessment process, and candidates who may have difficulty meeting these requirements must be provided with advice and options such as appropriate language and literacy skills training. (ANTA 2004a, pp.42-43)

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

Reshaping and overriding practitioner concerns

The sequence of five texts presented here indicates that the impact of an excluding language form has been recognised and then subsumed in two separate review and development processes. The analysis reveals how an issue raised in consultations has been reshaped and redefined in processes that were aligned to national VET policy rather than to local needs. The issue in question is a concern that individuals and organisations engaged in learning and assessment roles are often excluded by the language used in the qualifications for VET practitioners. When the first competency standards were reviewed in 1997, the review report *appears* to have uncovered this issue when it found that most of the target audience for the standards was unable to work with them. In response, the review seems to have reshaped the issue by deciding that only people who could demonstrate ‘sufficient expertise’ in working with the

standards would be authorised to speak and be heard in the review. This response shifted the focus from the appropriateness of the standards to the expertise of the people working with them and in making this shift any questions about the language of the standards were pre-empted. The language issue was again made visible throughout the Training Package review and redevelopment process that commenced in 2001. Once again the official response shifted the focus from the *suitability of the language* to the *characteristics of the people* who are trying to engage with it.

Narrative accounts and organisational responses

Practitioners engaging with the consultation processes contributed what they knew from their experience in local sites. But the authoritative descriptions generated from those consultations ‘wrote up’ the local experience in ways that established a rupture between the official account and the lived experience (Smith, D.E. 1984, cited in Campbell 2003, p.15). Practitioner input, such as public comments on the draft TAA04, were typically presented as narrative accounts grounded in local experience:

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

In contrast, official responses were written up using what Richard Darville (1995, p.254) called ‘organizational literacy’. In addition to the extracts presented above, the TAA04 assessment guidelines also state:

The TAA assessor is responsible for ensuring the integrity of the assessment process of the Training and Assessment Training Package (TAA04) units. Part of this responsibility involves the provision of initial advice to TAA candidates to ensure they are fully aware of the assessment requirements ... This advice ensures TAA candidates can make an informed decision about proceeding with training and/or assessment ... (ANTA 2004a, p.42)

The issue introduced in the public comments, that the language of the Training Package excludes particular individuals and groups, is still present in the official response but it has been reshaped. Practitioners identify the potential for this language to exclude as a matter of concern; potential students may ‘drop out’. The assessment guidelines present a very different emphasis; limiting access to people who are able to use this language is required to ensure the ‘integrity of the assessment process’, and individuals who are put off by this are making ‘an informed decision about proceeding with training and/or assessment’. The use of organisational literacy in the later text expresses the ‘mandate’ of the VET policy framework and ‘functions to claim actuality for organizational purposes’ (Smith, D.E. 1990b, p.153).

Establishing institutional language as an assessable benchmark

To be assessed as competent in the *Certificate IV in Training and Assessment* an individual must demonstrate that they are able to read and interpret Training Packages and communicate using acronyms, jargon and VET language styles and terminology. This benchmark is reflected in the language form used throughout the Training Package, which is itself characterised by acronyms, jargon, passive voice and language styles that were criticised in the consultations. It is a circular argument. By establishing this language as the *benchmark* for people involved in training and assessment it can be argued that using this language *within the Training Package* is appropriate to this audience. In turn, stating that the formal ‘LLN’ review confirmed that the language is *appropriate* to the audience gives some authority to the use of that

language as the *benchmark for competency*. The benchmark is established as an objective standard applicable in all local contexts in which vocational learning and assessment is undertaken and the circular argument leaves no room for this benchmark to be challenged by reference to the needs of particular local contexts.

The status of this Training Package

The Training Package that holds the qualifications for VET practitioners is accorded unique status as a regulatory text that encompasses some of the authority of both Training Packages and the Australian Quality Training Framework (AQTF). As a text it has the formal regulatory status of an endorsed Training Package but it also acquires some of the regulatory status of the AQTF in that it governs the implementation of all other Training Packages (NAWT 2001, p.1). Training Packages are an integral component of the ‘complex field of coordinated activities’ that make up the ruling relations of VET (Smith, D.E. 1999, p.79); they do indeed reflect the ‘rules of the VET game’ (Schofield & McDonald 2004, p.8).

As material texts Training Packages are exactly the same in every learning and assessment context in which they are used. They share the property that Dorothy Smith (1999, p.79) called ‘indefinite replicability’ but they are only activated as they are read by particular people in particular local sites. But the complex and abstract language is capable of many different interpretations. ‘Indefinite replicability’ will only be achieved if the people reading the texts in different sites read them in the same way. The Training Package qualifications for VET practitioners provide the vehicle through which practitioners learn to *read* national VET texts and to *organise* their professional practice to align to the texts in ways that will support the policy goal of national consistency. Through these Training Package qualifications VET practitioners do more than just learn how to plan and implement learning and assessment programs; they learn to align their activities to the particular requirements of the National Training Framework. It was this property that made the *Training Package for Assessment and Workplace Training* a ‘lynchpin of the current VET system’ (NAWT 2001, p.1).

The special status of this Training Package introduced a number of tensions and contradictions in the review process. The *Training Package Development Handbook* specifies that Training Package reviews must involve consultation across ‘the full diversity of the industry’ (ANTA 2004b, pt.1, ch.2, p.8). In reviewing *BSZ98* and developing *TAA04* RTOs and practitioners approached the consultations not just as providers but also as the primary target group for the qualifications. This industry input was well informed, provided by people who were knowledgeable readers of Training Packages and familiar with the VET context. But involving the ‘full diversity’ of a well informed industry in reviewing a Training Package that was a ‘lynchpin’ of the VET system and a key component of the ‘rules of the VET game’ exposed fundamental issues to public critique.

The VET sector is a widely diverse and complex federal system based on government agreements, with multiple layers of decision making and widely varying practices; the result is ‘a very dynamic system’ which is ‘inherently unstable’ (Smith, E. & Keating 2003, p.51). Practitioners and RTOs were aware of the contradictions inherent in the discrepancy between learning and assessment practice as it is enacted in local sites and as it is described in the Training Package standards. It is through the hidden work

of RTOs and practitioners in local sites that such contradictions are resolved and the 'inherently unstable' VET system takes on the appearance of working smoothly (Campbell & Gregor 2002, pp.20-23). When practitioners and RTOs participated in the review they made these contradictions visible. For the review and development process to take these issues on board and respond to them in a substantive way could have had serious implications for the system as a whole. To achieve the policy goal of national consistency the Training Package that contains the qualifications for VET practitioners *must* be consistent with other ruling texts such as Training Packages, the AQTF and the Australian Qualifications Framework (AQF).

Instead of responding substantively to the concerns and contradictions raised in consultations the development of *TAA04* reshaped the issues raised in ways that aligned them to the existing regulatory framework. Herein lies a major contradiction within the VET sector's claim that decisions are based on consultation. While consultation processes are aligned to existing conceptual frameworks and policy agendas there is little room for practitioners to raise fundamental contradictions and inconsistencies in the operation of the system at local level. This is reflected in the interview data from my study, which reveals a strong sense that VET consultation processes are not typically structured to effectively incorporate practitioner input and feedback, particularly input that is critical of current policy or practice.

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

Through my own experience as a participant in the review and development process examined in this paper I accepted, and still accept, that there was a genuine desire on the part of the development team to respond effectively to the language issues raised in the consultations. Yet analysis of the five texts examined in this paper indicates that there was never any real prospect of the language changing.

Conclusion

Much is at stake here. The language form that has been set as the benchmark for language use across VET and beyond is one which has been widely acknowledged as excluding and marginalising many of those who seek to engage with the national VET system. Prior to the endorsement of the *Training and Assessment Training Package* the language form was widely used but skilled practitioners were able to circumvent it and create spaces for meaningful learning for their participants. With the endorsement of this Training Package this excluding language form is now established as a benchmark that has regulatory status. As the 2001 review report noted, this is a 'significant accessibility issue' (NAWT 2001, p.44) but the VET system as it currently operates has proved incapable of addressing this issue in any way other than to entrench it.

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