Quality matters offshore
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Abstract

This paper is based on the findings of a recent (2006) NCVER-managed DEST-funded project examining the quality of VET programs offshore, *Quality Matters: promoting quality improvement for offshore VET programs*. The project documents quality assurance systems for programs in two of Victoria University's partner institutes in China including various elements of Australia's quality assurance system that do or could support the quality of offshore educational programs (AQF, ESOS Act, NEAS, AVCC Code of Conduct, Victoria University Teaching and Learning Policies, ISO and AQTF). The relevance of the AQTF for some offshore operations is questioned as some Standards neither acknowledge nor measure the complex offshore context. Amongst other themes, the report examines partner perceptions of competency-based training, Australia's vocational sector, quality, and the need for equivalence and comparability. Cross-cultural issues in teaching and learning emerge as a key professional development need for all staff working offshore. A key message is that Australian industry-driven training packages do not provide the best educational program for entire cohorts of LOTEB (Language Other Than English Background) students, studying in China, whose sole intention is to articulate into English-language higher education programs. The project recommends that internationalised Diploma curriculum courses which have language and learning support embedded in each unit of study be developed. The conference theme of 'Evolution, Revolution or Status Quo? the new context for VET', is absolutely suited to a project that suggests that nowhere is the context so challenging, so demanding of change in VET teachers, so demanding of revolution in educational programs than the provision of VET in China.

Introduction

In 2005, Victoria University (VU) undertook a DEST-funded project to examine the quality of its VET programs in China. One of 15 projects managed by NCVER focusing on the quality of offshore VET delivery, *Quality Matters: promoting quality improvement for offshore VET programs* examines and documents quality assurance systems for VET programs in two of VU's partner programs in China. The project focussed on the Diplomas of Business and Information Technology. Both Diplomas are delivered in partnership with Chinese University partners. VU's VET programs in China use the "burst mode" of delivery whereby Australian teachers teach the first two weeks of a program, sometimes with the local teacher sitting in on the class, and then the local teacher delivers the rest of the program using resources provided by VU. Assessment is primarily the responsibility of Chinese partner staff although VU sets assessment. VU teachers coordinate the end of delivery – moderation, evaluation and administration. In part, the project set out to determine both if VU's offshore delivery was AQTF compliant and if the AQTF is an appropriate gauge of quality in a partnership arrangement in China. The project also examined China's regulatory context.

A range of international, national and institutional quality assurance systems, processes, frameworks and guidelines might apply to VU in its role as an Australian Registered Training Organisation (RTO) awarding VET qualifications to international students in China: International Organization for Standardization (ISO); Australian Qualifications Framework (AQF); the Education Services for Overseas Students (ESOS) Act;[1] Australian Vice-Chancellor's Committee (AVCC) Code of Conduct; Australian Quality Training Framework (AQTF); and VU's own Teaching and Learning Policies and Procedures. But.how relevant, appropriate and effective are these quality systems or frameworks for VU's VET programs in China? And, further, can Training Packages be sufficiently contextualised within AQTF limits to render them appropriate for the different cultural and industrial setting in China?

Literature review

The Executive Summary of *Transnational Education Providers, Partners and Policy* begins succinctly: 'Offshore programs are controversial' (Davis, 2000: 1).[2] Davis's study refers exclusively to higher education transnational programs but, in some respects, the delivery of training packages is more controversial. VET's increased focus on quality in the last decade had not, until recently, included offshore operations. Marginson (2005) notes that offshore educational operations have 'escaped proper scrutiny by policy makers, by regulators, up to now'. Quality offshore is of pedagogical, commercial and diplomatic significance for Australia. China is a market that has grown considerably for Australian educational providers. Offshore education is important to what VU does as a university and VU is aware that the quality of any offshore VET program impacts on *all* VET providers operating in the region.

The development of training packages by industry bodies and their endorsement nationally by the National Quality Council (NQC) is a key quality assurance mechanism underpinning the AQF. Training Packages specify the sets of industry competency standards, comprised of units of competency, aligned to relevant AQF qualifications. They include guidelines for assessment to support national consistency. How relevant they are for offshore delivery is a matter for discussion.

The *Commonwealth Education Services for Overseas Student (ESOS) Act*, 'has become a de facto quality benchmark for the education export industry as a whole' (PhillipsKPA: 203). The *ESOS Act* was introduced to protect Australia's reputation in a burgeoning and competitive education market through registration of education providers. International students as consumers are offered some protection through the Act. The *ESOS Act* provides arrangements for dealing with student grievances and dispute resolution and ensures that student welfare and support services for international students meet nationally consistent standards. The *ESOS Act* works in conjunction with CRICOS (Commonwealth Register of Institutions and Courses for Overseas Students). Neither the *ESOS Act* nor CRICOS apply offshore. The *ESOS Act* covers students in Australia on a student Visa. Australia's international students who

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[1] The ESOS Act is relevant only in so far as "equivalence" between on- and offshore programs are concerned. Quite simply, because the ESOS Act does not apply offshore, quality assurance systems for international students are not equivalent on- and offshore. International students enrolled in the same Australian qualification *could* be treated differently, even by the same institution and not have the equivalent means of address.

[2] Quotations from secondary sources are in single quotation marks while quotations from interviewees are in double quotation marks and are usually anonymous.

enrol offshore are not covered and inconsistencies in quality between on- and offshore delivery may arise.

'The selection and operation of quality indicators is strongly influenced by contextual factors…[including] personal characteristics and background of learners, community influences, labour market and family factors' (Blom & Meyers 2003). For Australian VET programs taught in partner arrangements in China, the context is complex, layered and, to some extent, unknown by some Australian participants. VU knows little about how the quality indicators used in our Chinese partner institutes might compare with the AQTF. As Minister for Education, Science and Training, Julie Bishop, remarked: 'A global education sector is bigger than any single country's perspectives or policies' (Bishop 2006). A cooperative approach to quality is required.

Given Xu Yongji's belief that 'Education is a lofty social undertaking',[3] Australia's commitment to quality in transnational VET education needs to move beyond compliance with Australian industry-driven AQTF Standards in any case. Partnerships in China are seen as complicating quality assurance. As more is known about the regulatory and quality context in China, partnerships could more fruitfully be seen as enriching the quality assurance system. The AVCC Guidelines (2005) require that the offshore partner of an Australian university is 'subject to similar academic quality assurance processes as the university itself' (16). An OTTE auditor conducting VU's mock audit said that the AQTF deems offshore to be "just another campus". Whether these positions are tenable is questionable. [4]

The Standards of the AQTF neither acknowledge nor measure the offshore context and it is clear that the various stakeholders involved in the delivery of VET offshore (partners, students, local teachers, VU teachers and Australian industry) have 'quite different expectations of what the VET system should deliver' (*ibid*. 40). Entry into the labour market, a primary quality indicator of onshore VET programs, is not an appropriate quality indicator for the offshore programs of this study: successful entry and transition into degree programs is. Articulation is not a focus of Training Package development. Articulation between VET and Higher Education is cited as a problem for both the international student market and for individual overseas students (Schofield, et al. 2004: 7). As quality indicators, articulation and subsequent success in higher education do not feature in VET. 'Quality' is steeped in a particular VET culture of a particular political context and is not appropriate for any context. Quality indicators like achievement of competency and work readiness at completion of training may not be appropriate for offshore programs.[5] Smith and Smith (1999) warn that 'cultural imperialism…can attend the delivery of VET programs designed for one culture [and delivered] into another' (2). The AQTF should heed the need for cultural variations and ask, are rules about contextualisation and customisation flexible enough? Should all Standards apply all of the time? Is it even appropriate to deliver Training Packages offshore?

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[3] Australian Education International (Beijing) ran a 2-day workshop co-hosted by China's MoE: *Australia-China Workshop for Quality Assurance and Management in Transnational Education Delivery*. Xu Yongii's PowerPoint is at https://aei.dest.gov.au/AEI/MIP/CurrentMarketInformation/China/MarketUpdate/China06MUD01.htm accessed 11/4/06.

[4] William Thorn (2005) discusses the "relative responsibilities of authorities in an institution's 'home' country (the exporter) and those in the country of the consumer (the importer)" and the issues of legal 'reach', that is jurisdiction, and effective monitoring of regulations.

[5] Blom and Meyer (2003) note stakeholders' expectations of VET training includes achievement of competency, work readiness, cost effectiveness of training and extent of transformation and development of the individual (42). Of these, only the last two are appropriate for VU's current VET programs in China.

'China is perhaps the world's most over-hyped, under-analyzed and complex market for transnational higher education' (Garrett 2003: 1). With mass education in China increasing steadily since 1980, quality assurance poses a challenge. Quality in China is becoming more visible. Chinese enterprises are encouraged to pass the ISO 9000 accreditation and quality logos appear on everything from yoghurt to tissue dispensing machines. Quality of transnational programs is high on China's Ministry of Education's agenda. From mandating teacher certificates for teachers at all levels of education, to legislation and Regulations on Chinese-Foreign Co-operation in Running Schools (2003), Chinese interest in regulating education is clear; moreso if foreign partners are involved. Tao Hongjian (2005) mentions a 'crackdown on unstandardized practices'. But quality has to be more than catching 'dodgy' providers. In 2004, China's National Audit Office (NAO) audited 19 universities. Typically, this involved specially-appointed auditors setting up notices and a 24-hour hotline 'to encourage teachers and students to provide information about any inefficiency, waste, unreasonable charge…or serious crimes like corruption, bribery' (China Daily). Interestingly, this auditing enjoys a huge amount of popular support with the Auditor-General of the NAO, Li Jinhua, recognised as 'the person of the year' in 2004 (Qiwen 2005). The issues covered by the NAO undoubtedly affect educational programs but the focus of these very public audits is fiscal not educational.

Research Method

The project used a range of methods to both collect information and to develop quality and professional development resources. Consultations were conducted with managers, coordinators and teachers, VU's key agent in China and other relevant practitioners in the field on- and offshore. The Dean of each offshore partner institute made staff available for interviews during onsite visits. Follow up questions with individuals were done both via email and face-to-face. In addition to document analysis, interviews and literature review, the Business Diploma undertook a rigorous 'warts and all' mock audit by an independent OTTE-accredited auditor against the AQTF while an external consultant ran a cultural audit of all Diploma of IT resources (readings, PowerPoint slides, subject outlines, assessment tasks, learning activities, student handbook). Finally, a professional development program for teachers teaching in China was developed, piloted and evaluated. Offshore VET programs were also evaluated against the following VU Teaching and Learning policies and codes: Staff Code of Conduct; Student Assessment; Plagiarism; Student Progress; Quality and Planning; Admissions; Articulation; and Recognition of Other Learning.

Findings

In *Shaping our Future*, an objective for 2004–2010 is that 'Employers and individuals will be at the centre of vocational education and training'. VU's VET Business programs offshore place higher education at the centre of teaching. One coordinator offshore commented on the "tension between the prescribed structure of training packages" and what students want: "Students…don't want workplace skills, they want study skills". References in *Shaping our Future and VET* are always industry, Australia and Australians. The last objective is:

> **12. Facilitate access to international markets**
> - Vocational education and training exports increase, on-shore and off-shore.
> - Vocational education training standards are more harmonised with international standards (17).

The word 'off-shore' had not been mentioned before. In the key performance measures, no mention is made of the international cohort either on- or offshore.

Offshore operations appear here as an afterthought. International training markets can seemingly be well served by Australian VET programs with a few additions and/or omissions. 'Globalization presents Australian VET with a potentially large, new and diverse client group whose occupational, social and politico-legal environments are based on norms and standards that can differ considerably from the assumptions underlying the Australian competency-based model of training' (Moran & Ryan 2003) and we need to adapt our training to suit.

DEST (2005) insists Training Package developers 'Use a network of industry contacts to ensure learning is relevant to current workplace practice'; yet the level of international industry representation or influence in Training Package development is unknown. The ten Industry Skills Councils that provide advice between the VET system and industry do not systematically have international representation. A key role of the Industry Skills Councils is to provide 'accurate industry intelligence to the VET sector about current and future skill needs and training requirements'. It would be expected that scoping reports into industries produced by Industry Skills Councils might include reference to international perspectives and international benchmarking of current Australian practice, but how training packages might become 'more harmonised with international standards' is far from clear.

Industry is a key player in vocational education and training and the first objective of the national strategy for VET in Australia *Shaping our Future* (2004) is industry focused: 'However, there has been a change in emphasis…now it is recognized…that the needs of individual and communities needs to be addressed as well as the needs of industry' (Karmel 2004: 6). This is evident in offshore cohorts seeking articulation into higher education degree programs for whom Australian industry and business is not, in the short term at least, a focus. Differences between VET for industry and VET for individuals are pronounced and 'the rules governing the use of training packages need to be revisited to better accommodate the requirements of the international markets' (Moran & Ryan 2003: 58). Issues for VET in international environments include nomenclature, addition of other competencies, English language and the availability of real or simulated work environments. The capacity of offshore partners to provide relevant workplace outcomes for VET programs has repeatedly been questioned. Nomenclature is also problematic as in China, 'higher education qualification certificates [are] also known as diplomas of qualifications or graduation diplomas [and] are state-recognized evidences of their holders having received higher education' (CHESICC 2006).

In a complex and changing training scene with a diverse range of stakeholders, it is important to clarify the role and function of training packages in contemporary VET provision and to recall 'what Training Packages are not designed to do' (ANTA 2004: 42). They were not designed to address some of the issues this project has raised.

The growing educational exports to China highlight how very 'culture bound' (Moran & Ryan 2004) the AQTF and training packages are. And not 'culture bound' simply in the sense of being Australian but also in the sense of their focus on 'meeting the expectations of business and industry, and industry is often narrowly focused on equipping learners to function in the current work environment, rather than concerning itself with preparing learners for future work and the journey of lifelong learning' (Blom & Meyers 47). 'VET works for people giving Australians world-class skills and knowledge' states a heading outlining Australia's National VET Strategy in *Shaping our Future*. Whether 'Chinese' can or should simply be transposed for 'Australians' is highly debatable. Problems arise with the transposition of training packages developed with and for Australian industries to China: the industrial setting

is only one major difference that needs to be negotiated. Apart from relevant industry and legal aspects of the national/cultural separation between development and delivery of curriculum, such a model is a neo-colonialist mode of education where the centre dictates to the margin. Nationalization and localization of curriculum have long played a part of the decolonization process and it is ironic that imperial models are once again manifesting in China (Ziguras & Rizvi 2001: 154) – including in respect to quality. Tendencies towards globalizing the curriculum have been critiqued for the potential to 'impose the same standards everywhere, and this will dissociate education from the social, cultural and political origins of a country' (Hallak cited *ibid*.: 155). The structure of Australian staff developing curriculum without reference to the Chinese context which is then delivered by 'local' teachers in English mimics colonialist relationships outlined by Said wherein the local teacher becomes a 'surrogate' and inferior self (Said 1978: 3). Amid these concerns of colonialist tendencies, training packages' focus on work-referenced assessment and competencies worries both Chinese partners and higher education selection officers.[6] The AQF website states clearly that the focus of VET is learning in and for the workplace. VU's VET programs in China have articulation to higher education as the only goal. Training packages offered offshore by VU are pathways into higher education courses. They are delivered, assessed and constituted to prepare students for higher education subjects at VU and to maximise the credit available for students accepted into those degrees. They have been successfully doing this for over 6 years.

It is common knowledge that students enrolling in VU's VET programs offshore do not want a Certificate IV or Diploma qualification. They did not want to work in industry at that level either in China or Australia. Students enrol in VU's VET programs in China because they offer both preparation for and a Pathway into higher education programs. The Diplomas in IT and Business are pathways for students to higher education programs in China and Australia. The vocational outcomes of students are expected to be more professional, in keeping with aspirations of students and their parents and the cost of their education.

In support materials for teachers in the VET system, there is little on teaching NESB students or teaching offshore. A guide for VET teachers *Contextualising teaching and learning* (2005) speaks of the range of RTOs, the range of settings – classroom, industry, online – and says 'it will provide examples of good teaching practice in different settings'. At no point is teaching offshore mentioned. The following simplistic paragraph needs some unpacking in an offshore and even cross-sectoral setting: 'no matter where the learning takes place, the teaching activities reflect what happens in the workplace. This is because the teaching and learning is based on Training Packages and Training Packages are based on the skills and knowledge required in the workplace' (DEST 2005: 3). Ironically, this culturally loaded idea of 'the' workplace has not been contextualised in the guide for the growing market of China. The report defines contextualising as 'the activity undertaken by a teacher to make units of competency meaningful to the learner. This involves incorporating industry or enterprise work practices into the teaching and learning process' (6). VU's partner institutes are of little assistance in contextualising training packages for a Chinese industry context as these universities are predominantly academic and not industry referenced. Further, some of the competencies are specific to Australian industry and Australian law and cannot be customised easily. Interviewees thought that comparative approaches to some subjects would be more meaningful to students;

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[6] In a 2005 report (Woodley, C. et al) *Selection processes and pathways: TAFE to higher education*, selection officers expressed concerns about the "ability of TAFE programs to develop the academic skills of students and of TAFE grades to adequately reflect "academic ability"" (6).

Australian Business Law was suggested as an example of a unit of study that would benefit from a comparative approach. But, as one teacher commented, "You could end up failing someone on the basis of something that is not in the Training Package" if you try to make assessment relevant. Management and Marketing programs cover a range of 'other' content in training packages but insist that "it's integrated". For example, Management and Marketing teach a competency unit in *Forecasting Marketing Needs* and use that to develop skills and knowledge in Statistics and Maths to optimise students' credit in the Business degree. This sort of customisation is appropriate from the perspective of implementing 'appropriate learning and assessment strategies to meet the needs of each of its clients' (Standard 9).

'The concept of competency focuses on what is expected of an employee in the workplace rather than on the learning process; and embodies the ability to transfer and apply skills and knowledge to new situations and environments' (National Training Board 1992). That competency-based training 'is more contextually-bound than is often acknowledged' (Harris, et al. 1995: 5) is a problem for offshore delivery in China. In Australia, competency-based training has developed in a national context of training reform. There is no such context in China although it does seem to be emerging. Competency-based training may be appropriate for trades areas in China but it is more problematic at AQF IV and V when students are using training packages as Pathways to Australian degrees. Even at VU onshore, competency-based assessment has uncertain value at Certificate IV and Diploma level in the event of higher education selection.[7] Offshore VET programs suffer from attempting to both teach to a Training Package and prepare students for higher education. One teacher said the assessment was more geared to higher education – students had assignments and tests and were required to 'argue a position'. Not surprisingly, the 'mock' auditor noted the lack of vocational assessment. An evaluation into Business Management programs reports, 'the aim [of the program] is to incorporate some activity-based assessments….so that the training requirements of AQTF can be demonstrated at the same time as the needs of higher ed. can be met.' Despite VU's attempts to support students' academic goals, Chinese teachers said that Australian teaching was about "practical things" while the Chinese at higher education level wanted to "focus on theory". Chinese teachers were concerned about Diploma graduates' ability to cope in a degree. They agreed, however, that "students need to know…[the] world of work".

Interviews suggest mixed ideas about competency-based assessment offshore. Both the IT and Business programs grade students; that is, as well as being pronounced competent, students receive a percentage grade. VU's Student Assessment Policy requires that assessment that is graded have 'pre-specified, explicit criteria' and for 'each assessment task, all students must be clearly informed of the nature of the task, [and] the criteria used in the assessment of their work'. For competency-based assessment, a student must be deemed competent before a grade is given. Criteria for a graded approach might include statements about quality of presentation, timeliness of work, accuracy, adaptability and enthusiasm. Much of the current graded assessment offshore seems to be about what the student doesn't know or can't express in reasonable English. Explicit criteria for assessment is fairer to students and also assists local teachers in assessing student work. Explicit criteria for assessment also aids the moderation process.

Both mock and AQTF audits highlighted the need for assessment in some competencies to "include a simulation involving a client", to simulate the workplace.

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[7] Monash University will not consider applicants with VET qualifications unless they are graded.

The logistics of this is difficult but it is not just numbers and resources that lessen the likelihood of simulations. This approach to teaching was not valued: offshore staff complained that the program was too practical and not theoretical enough. There were concerns that vocational assessment did not prepare students for higher education. This echoes a suspicion, voiced by a Private RTO Manager in Moran and Ryan's study of the AQTF and transnational education, that it is VET's association together with the advance standing arrangements in Pathways with universities, that makes VET attractive to Chinese partners: 'If it weren't for the fact that we have these agreements with the unis…a lot of them wouldn't even bother to talk to us…AQTF qualifications and the (State) stamp of approval mean absolutely nothing' (2003, 50). Chinese university students do not want vocational qualifications. They want a Pathway: 'agreed articulation into Higher Education promotes client confidence and is an effective VET marketing tool' (Schofield, et al.: 7).

The AQTF is well known onshore and course coordinators at VU are compliant and beyond in many of the Standards. So what is known by partners about the AQTF and what quality systems are they working to? Both VU and its partner institutions have their own quality assurance processes. Chinese partners have institutional and provincial audits – and the Teaching Affairs Department in Chinese universities has a major role to play in evaluation of programs through administering student evaluations and arranging panels of experts to observe classes. A difficulty arises in mapping what each institution does and deciding on equivalence of quality outcomes. Also, much of the partner's quality processes are not public – that is, teachers reported that they only heard back from Teaching Affairs "if it was really bad". Further, naturally, most quality documents offshore are in Mandarin (although most of the graphs depicting quality outcomes are easily translated). Partnerships offshore do present challenges about conceptions of quality, responsibility for quality, purposes of quality assurance processes and systems and a broader issue around cultural differences. Partner selection is a key consideration at the outset and contracts are crucial in outlining responsibilities. The questions as to who admits students, approves program content, decides content contextualisation, appoints lecturers, evaluates teachers, sets and marks assessment and decides student appeals are all covered in contracts.

Of the 12 Standards,[8] 7, 8 and 9 provided the focus of interviews although others were considered. For example, Standard 2 (Compliance with Commonwealth, State/Territory legislation and regulatory requirements) is legally and culturally problematic. Consider 2.1 with its focus on Occupational Health and Safety, Privacy and anti-discrimination. Thorn (2005) mentions the quite basic issue of jurisdiction. The partnership arrangements mean that monitoring the legal elements of Standard 2 is limited or inappropriate. The example of Privacy demonstrates that some of these legal differences are also major cultural differences. VU's Student Assessment Policy says that VU 'is committed to protecting the privacy of its students…[and] ensuring the confidentially of any student work submitted for assessment as well of the grades and feedback arising from that assessment'. Interviewees teaching in China comment that students receive very public criticism of assessment so the whole class can learn. 'In the West criticism is frequently meant, and taken, punitively' (Biggs in Watkins & Biggs 1996) but the same is not necessarily true in China. Privacy does not just concern students but staff as well. A recent audit in on offshore partner institute by

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[8] Systems for quality training and assessment; Compliance; Financial management; Administrative and records management; Recognition; Access, equity and client service; Staff competence; Registered training organization assessments; Learning and assessment strategies; Issuing of qualifications; Use of logos; Ethical marketing and advertising.

Chinese regulators saw a local teacher publicly lambasted by auditors. A VU teacher commented that the "attack" was so comprehensive and severe that "really, suicide was his only option". We need to recall that not only is a public criticism a culturally constituted situation, but so too is the response to it.

China's Education Regulatory Environment

The Ministry of Education's 2003 *Regulations of the People's Republic of China on Chinese-Foreign Cooperation in Running Schools* states that all Sino-foreign partnerships must be approved by China's State Education Commission (SEC) and must comply with the General Provisions as approved by National People's Congress. Higher Education programs must run in accordance with the Higher Education Law of the People's Republic of China.[9] The SEC guidelines *Contemporary Regulation on Operation of Higher Education Institutions in Co-Operation with Foreign Partners* forms part of the 2003 legislation covering Chinese-Foreign Co-Operation in running Schools. Generally, the regulations require that Degree provision to be approved by the Ministry of Education while Diploma provision is to be approved by relevant local authorities (ie provincial authorities). Partnerships must have approval. More importantly, however,

- Foreign teaching and managerial staff must have a bachelor's degree, any relevant professional qualifications and at least 2 years teaching experience as a minimum
- Jointly-run operations must include programs required at Chinese institutions at the same level (eg moral studies, current affairs) (Garrett 2003).

Of most interest here are qualifications of foreign teaching and management staff. Many teachers in VU's VET programs offshore have a bachelor's degree and Graduate Certificates or Diplomas. Not all do and this is not a requirement of the AQTF. Clearly the Certificate IV in Training and Assessment together with a Diploma or industry experience is not sufficient to meet Chinese quality regulations regarding qualifications of staff.

'Universities have sought to become the 'gatekeepers' of quality as VET providers juggle between the curriculum-based requirements of degrees and the competency-based requirements of Training Packages' (Ryan & Moran 2003: 3). Competency-based training (CBT) works well to measure technical and procedural knowledge but is inadequate to measure conceptual and experiential knowledge (ANTA 2003). Such a statement can be debated indefinitely with competency-based training advocates stressing the adaptability of training packages and their capacity for contextualisation. But partner staff in China raised two major problems concerning CBT:

1. the extent to which competency-based training is achievable offshore
2. the incompatibility of competency-based versus curriculum based assessment

CBT may also be difficult to use in assessing and providing student feedback on their English levels as language requirements are general and referenced to the workplace. This last point about language is a matter on which the AQTF is almost silent. Apart from a requirement in Standard 10.3 that an RTO 'must note the language of delivery and assessment on AQF qualifications and statements of attainment issued if the delivery and assessment have been *entirely* in a language other than English' (emphasis mine), language is not mentioned. It is *the* key quality issue according to

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[9] The following websites have information on these regulations: Regulations of the People's Republic of China on Chinese-Foreign Cooperation in Running Schools: http://www.moe.edu.cn/english/laws_r.htm, General Provisions as approved by National People's Congress: http://www.edu.cn/20050127/3127991.shtml, Higher Education Law of the People's Republic of China: www.edu.cn/20050127/3127992.shtml

teaching staff. The ability of students in China to improve their English in China is limited by several factors: students "do not speak English anywhere" other than the classroom, numbers in class limit oral and speaking exercises and students' ability to attend activities such as English Corner[10] is limited by their "very tight" timetable.

Business and IT programs aim to provide students with the skills necessary to articulate and successfully participate in degree programs both off- and onshore. To that end, attention is paid not only to competencies in the training package but also higher education subjects for which students get credit. Australian culture, values and study styles are also embedded in the curriculum. In addition, a focus on English language acquisition is evident in several subjects although different contracts have different arrangements about minimum class sizes. Class size impacts on the ability to teach and test English, especially speaking skills. Large class sizes, passive teaching and learning styles and little structure, opportunity or time to practise English language communication skills can exacerbate this problem. Teachers employ various strategies in an attempt to overcome the lack of time and opportunity students have to practise English language skills and to help them master the academic literacies they need to succeed in their degree course. At VU, the preferred strategy is to embed learning and language skills in all subjects. It is imperative that language and learning skills are embedded in the content of each of the VET Diploma units of study.

English language proficiency is the key reason offshore students are identified as being at risk. The language of instruction in Victorian RTOs is English but the AQTF is not helpful about the language of instruction (Moran & Ryan) and some VET programs offshore are neither taught nor assessed in English. VU's VET programs, however, *are* taught in English and much is done to embed language and learning support into Management and Marketing in particular. All delivery by visiting teachers is in English and delivery by local teachers is in English although some explanations are offered bilingually. All assessment is in English. The quality of pathway arrangements from TAFE to higher education (both offshore and onshore) could be improved by embedded language and learning support and through professional development programs for both onshore and offshore teaching staff. In short, language teachers need to teach discipline and academic culture and discipline teachers need to teach language – quite explicitly. One VU teacher said that teaching was "wearying" as he had to be the "glossary man at the same time" but clearly attention to language is a basic teacher responsibility – particularly for this cohort.

Conclusions

With AQTF 2007 looming on the horizon for implementation in June 2007, some of the quibbles about the AQTF represented here may well be allayed. However, a major recommendation from this report, and one that a VU working party convened to respond to the recommendations endorsed, is that VU should not deliver training packages offshore when students are intending to articulate into degree programs. Instead, VU should develop curriculum that is internationalised, has language and learning support embedded in it and which is referenced to higher educational degrees. This will involve a major shift in program material which will need to be underpinned by VET teachers who are appropriately qualified to teach in both Chinese universities and to Australian higher educational curriculum to students who are global in their outlook and cross-cultural in their approach to learning.

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[10] Most universities have an English Corner. It is a student-driven group who meet weekly to practise English. Local English teachers sometimes attend to practise English, too. At one university, English Corner begins at 9:00pm. Given students' full timetables and the fact that many of them start classes at 8:00am, this is a bit late.

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