# The textual coordination of front line work in VET

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## Abstract

Many vocational educators put considerable effort into documenting their learning and assessment strategies to demonstrate that the programs they deliver comply with standards outlined in the relevant Training Package/s and the Australian Quality Training Framework (AQTF). At audit, these learning and assessment plans form an integral part of the documentation used to demonstrate organisational compliance and maintain RTO status. The paper explores the operation of these texts (Training Packages and the AQTF) using an Institutional Ethnography lens, as an accountability circuit which brings the front line work of vocational educators into alignment with institutional and governmental imperatives. In developing their learning and assessment strategies to address the national standards, vocational educators are drawn into a textually mediated process of self-governance in which they document their educational practice using categories set up to be read within the terms of the regulatory texts. The professional work of educators is then made accountable as their local learning and assessment plans are audited for compliance. When this study commenced in 2001, vocational educators described a shift in responsibility from the RTO to individual educators whose local learning and assessment plans are crucial to maintaining RTO registration. Paradoxically, this was accompanied by an erosion of professional freedom as educators reshaped their practice to meet the requirements of the national standards. Training Packages and the AQTF have since undergone multiple revisions, yet anecdotal evidence suggests that the experience of educators at the front line has changed little in respect to their interactions with these texts. This paper will briefly present the findings of the initial study, review the impact of current developments in the regulatory texts of VET, and foreshadow the next phase of this project.

## Introduction

> And I think as far as the language [of Training Packages] goes it *is* a language – it is separate to English. It is *separate* to English. It is a special language that you have to be *knowledgeable* about. (Jacqui)

> I've gone on training courses to find out what the [AQTF] standards mean. And sometimes the people who *taught* me, I've been talking to *another* assessor and they've said "Oh no, it's interpreted *this* way". So in other words, because of the way the language is structured, and because of the vagueness of it, the interpretation is a really major problem. … You're never quite sure if you're right. You go into an audit and you think, you've got your evidence piled up to the ceiling. And they didn't need 90% of it, so you've spent hours compiling evidence that they didn't need. But they needed all this other stuff that you didn't prepare. So that while they're there you're rushing around like a mad thing trying to get all the evidence that isn't there because it wasn't clear that that was actually what was needed. (Jessica)

In 2001 I set out to conduct a PhD project which explored the contrast between the complex institutional language of Training Packages and the vernacular of local workplaces in which Training Packages are activated. As an experienced workplace trainer and assessor, I was interested in exploring the phenomenon of people who are able to perform a job role being unable to recognise their knowledge or skills as described in the terms of the national competency standards relating to that job role. As I conducted interviews with vocational educators, managers, administrators, auditors, researchers and policy makers, I found that my interviewees were typically unable to talk about Training Packages without also talking about the Australian Quality Training Framework (AQTF). As my own understanding of my research topic and data evolved, informed by the work of Dorothy Smith and the theoretical lens of institutional ethnography, the focus of my study broadened to bring into view how regulatory texts such as Training Packages and the AQTF operate as a hierarchy of 'extralocal' texts that organise the learning and assessment practices enacted in local sites (Smith, D.E. 1987, p.3; 2005, p.185).

My PhD project concluded in 2005, and in its later stages as I began to report the findings through VET research conferences and professional development workshops I found that my analysis and conclusions were enthusiastically received by people working in the sector. Now working in the university sector, I have wondered whether VET has moved on since my study was conducted. There is a new process for Training Package development, and there have been several iterations of the AQTF with the 2010 Standards being described as 'transparent', 'simplified and streamlined', with a focus on 'outcomes' and 'quality assurance' (DEEWR 2010, p.3). Even the new *Training and Education Training Package* (TAE10) competency standards are written in active voice – very different to the complex passive voice constructions so heavily criticised by interviewees in my study. Surely the issues identified in my research have been bypassed by such developments.

Perhaps not. While I no longer work directly with VET texts such as Training Packages and the AQTF, I maintain close contact with the sector. Conversations with professional colleagues who are working in VET suggest that, while some of the language may have changed, the underlying issue of a hierarchy of regulatory texts coordinating and organising local learning and assessment practice remains as current and problematic as I found in my earlier study. It is time to revisit my research and embark on a new phase to investigate the ways in which the issues that I identified in 2005 have evolved.

**Institutional ethnography**

An approach to the social organisation of knowledge, institutional ethnography was introduced by Dorothy Smith and developed in a number of key works (Smith, D.E. 1987; 1990a; 1990b; 1999b; 2005; 2006). Institutional ethnography does not see power relations in terms of 'heavy handed and unitary' approaches (DeVault 1999, p.49), but rather as being pervasively structured through what Dorothy Smith calls the 'ruling relations'.

> When I write of "ruling" in this context I am identifying a complex of organized practices, including government, law, business and financial management, professional organization, and educational institutions, as well as the discourses in

> texts that interpenetrate the multiple sites of power. A mode of ruling has become dominant that involves a continual transcription of the local and particular activities of our lives into abstracted and generalized forms. It is an *extralocal* mode of ruling. ... It involves the construction of the world as texts, whether on paper or in computer, and the creation of a world in texts as a site of action. (Smith 1987, p.3)

Institutional ethnography sees official texts as being neither passive nor neutral; texts actively organise and coordinate local activities (Kinsman 1997, p.216). Organisational knowledge is textually mediated. Work is coordinated, organised, and made accountable through text-based practices, and the *way* these texts are enacted at the local level is part of the meaning that they carry (Campbell 2003, p.3; 2006).

This approach to exploring and understanding the operation of texts makes institutional ethnography a powerful lens through which to explore VET. While the historical roots of vocational education in Australia lie in technical education with a documented history dating back to the 1800s (Murray-Smith 1965, p.172), the national VET sector in its present form has only existed for around 20-30 years. Under the division of legislative powers outlined in the Australian Constitution, the power to make laws in relation to education is a state, not a commonwealth, responsibility. Prior to the 1970s, non-university training for employment encompassed trade training through state regulated apprenticeship systems, technical education provided by state based technical schools, and (largely unregulated) workplace training (Smith, E. & Keating 2003, pp.6-13). In response to world economic conditions in the 1970s and 1980s, a succession of regulatory and funding agreements between national, state and territory governments saw the progressive emergence of a recognisable Vocational Education and Training sector largely aligned to national government policies and priorities. The Australian Qualifications Framework, national Training Packages and the AQTF (together with a 'maze-like array' (DET Qld 2003, p.1) of policy statements, funding agreements, legislation, procedural guidelines, statistical collections, research reports, newsletters, Internet sites, and review and consultation reports) theoretically provide a framework for the issuance of vocational qualifications characterised by nationally consistent qualification levels, content, delivery and assessment. Viewed through an institutional ethnography lens, this sector of education represents a complex of organised practices largely established through a process of generating a hierarchy of texts that construct VET as a site of action. From the outset, the focus of my PhD study was firmly on Training Packages – one of the forms of text that make up the national training framework.

Another aspect of institutional ethnography that resonated strongly with my research project was the fact that institutional ethnography starts from where people are in their everyday lives, and focuses on 'looking out beyond the everyday to discover how it came to happen as it does' (Smith, D.E. 2005, pp.1-2). Institutional ethnography:

> is committed to discovering *beyond any one individual's experience* including the researcher's own and putting into words supplemented in some instances by diagrams or maps what she or he discovers about how people's activities are coordinated (Smith, D.E. 2006, p.1).

Marie Campbell describes experience as the 'ground zero' of an institutional ethnographic analysis; 'analysis begins in experience and returns to it, having explicated how the experience came to happen as it did' (Campbell 2006, p.91). An

institutional ethnography study has its origins in 'a sense of problem, of something going on, some disquiet, and of something there that could be explicated' (Smith, D.E. 1999b, p.9). From this beginning the institutional ethnographer looks at the how and why behind the phenomena being investigated, asking questions about 'how things work' and 'how it's put together' (Campbell 2003, p.11).

My PhD study had its origins in the sense of disquiet and disjuncture I felt as a workplace trainer and assessor, when I repeatedly had to rewrite national competency standards into local workplace vernacular to make those standards accessible to workplace supervisors, trainers, assessors, learners, and assessment candidates. At the time I had been taught that competency standards were industry-developed descriptions of the knowledge, skills and attitudes required to perform particular roles to the standard of performance required on the job. If that were the case, how could I explain my experience that people who performed these roles in the workplace, supervised and managed people performing the roles, and even trained staff in the performance of the roles would typically pick up the competency standard for a familiar job role and struggle to make sense of it? When I raised this concern in conversations with other VET staff, the only answer offered was that the people I was working with were either not yet competent (for how could they claim to be competent if they didn't even understand the competency standard), or perhaps they were *technically* competent, but had deficient language and literacy skills. Certainly there were instances where these explanations 'felt' right. But when I began to work with university qualified (sometimes at postgraduate level) staff members seeking a Certificate IV or Diploma, the standard explanations simply did not work. There was clearly something happening here, and I set out to explore the language of Training Packages as an issue of power rather than one of deficient workplace literacy.

The fieldwork for my project involved 33 interviews loosely structured around a number of broad questions that I sent to each interviewee in advance. 27 informants were interviewed as VET practitioners, and 6 as VET participants, but as VET staff are required to hold VET qualifications there was some unavoidable overlap between the two groups and several interviewees chose to speak from both fields of their experience. Interviews were conducted with informants in NSW, Qld, WA, SA and ACT. VET practitioner roles included front line training and assessment, Training Package development and review, policy development and administration, research and consultation, industry advice, and AQTF audit and oversight. VET participants included training course participants and applicants for or recognition of prior learning. Between them the interviewees had experience with a total of 25 Training Packages.

I did not set out to examine the language of Training Packages as somehow being independent of the local sites in which they were being implemented. Each interview set out to explore the language issues encountered as each interviewee interacted with these texts in particular local sites – to explore the texts as 'situated in the local courses or sequences of action in which they are read and come into play' (Smith, D.E. 1999a, p.74).

As I conducted my interviews, asking questions about people's experiences working with Training Packages, their answers repeatedly strayed into discussion of the AQTF. Exploring the use of complex institutional language (dubbed by some

interviewees 'VET-Speak') in workplace learning and assessment programs where the educators themselves described their frustration about the barriers to participation arising from such language, I perceived an emerging theme of 'the AQTF made me do it'. Initially I was frustrated about this theme, as I had not consciously set out to research the AQTF. But starting with the everyday experience of vocational educators and exploring 'how and why' things happened as they did, brought into view the forms of power located in the operation of the AQTF as a frontline regulatory device that coordinates the work of vocational educators (Smith, D.E. 2005, p.193). When I analysed the data and asked 'what is actually happening here?', the operation of the AQTF in coordinating the professional practice of vocational educators came clearly into view.

**Findings and discussion**

From the wide range of texts that make up the VET regulatory framework, this discussion will focus on just two: Training Packages and the AQTF. In the *High Level Review of Training Packages*, Kaye Schofield and Rod McDonald (2004, p.8) stated that 'Training Packages reflect some of the most fundamental principles and policies on which the national VET system has been built (the 'rules of the VET game')'. They described Training Packages as being 'intimately intertwined' with other parts of the VET framework, and noted that they operate 'in a symbiotic relationship' with the Australian Qualifications Framework and the AQTF (Schofield & McDonald 2004, p.8). The 'symbiotic relationship' between Training Packages and the AQTF was strongly reflected in the interview data from my own study, with these two levels of text emerging as two levels of an 'intertextual hierarchy' (Smith, D.E. 2006, pp.79-87): Training Packages govern the *content* of VET programs, and the AQTF defines standards for the *delivery* and *management* of those programs. Together these two levels of text establish what institutional ethnography terms an 'accountability circuit' that governs almost every aspect of the work of vocational educators.

Institutional ethnography argues that individuals and organisations take up and activate ruling concepts in the local activities and procedures that they adopt as they engage with and implement ruling texts (Campbell 2003). Liza McCoy (1999, cited in Smith, D.E. 2005, p.174) argues that 'accountability circuits' are a form of coordination in which the activation of texts brings front line work into alignment with institutional imperatives. In accountability circuits 'work is tied into text and text into work'; texts occur in and are activated as part of frontline work (Smith, D.E., 2005, p.184).

Vocational educators in my study activated Training Packages and the AQTF in their frontline work in a range of ways. The AQTF standards in operation in the closing stages of my study were those defined in the 2005 iteration of the quality framework. The AQTF 2005 actually established the Registered Training Organisation (RTO) as the entity responsible for developing the procedures, processes and documentation required to achieve and maintain compliance (ANTA 2005). While largely invisible within the text of the AQTF Standards, vocational educators in my study revealed that in practice they were responsible for developing significant parts of the documentation required for audit. Central to this was their work in developing local training and assessment plans for each qualification or unit of competency that they delivered or assessed.

Their starting point for developing a training and assessment plan was to 'unpack' the Training Package (an official term: DEEWR 2008). In the following vignette, Louise describes her experience in confronting a new unit of competency. As an experienced vocational educator in Community Services, Louise takes us through the work that she and a colleague undertook in 'unpacking' the unit 'Respond holistically to client issues' and deciding how to 'cluster' this unit with other relevant units for integrated delivery and assessment:

> For a start, what does that [unit title] mean? And you should *see* the bloody language in that! We were sitting there absolutely baffled thinking, "Now what do we do with this?" This is a catch-all unit. Basically you can use it to teach whatever you like. The language is – I just know the other day I was sitting there with my colleague at work. So we were looking at clustering, and how we'd cluster, and we were looking at that and we were scratching our heads, it had us absolutely stumped. In the end, we thought "Well it would cluster with anything, because it could mean anything!" … it had these great big long sentences that didn't mean anything to me. And we read them over and over and looked at each other, and between fits of giggles and what not, we sort of decided that it was just really – you know. [Reading aloud from the unit] "Evaluate the range of issues impacting on the client and on the delivery of appropriate services". What the *hell* does it mean? I mean, you could say, *discuss* the range of issues, or *identify* the range of issues, but *evaluate* the range of issues impacting on the client? And even if you just look at the meaning of the words "the range of issues impacting on the client" – the sky's the limit! … So what have we got? "Use observations, assessment tools and questioning to identify possible presenting issues". I mean [Pause] Well I guess it means you sit and observe someone and make notes about how they're behaving as part of an assessment process. *But that's not how we work*. And "assessment tools" meaning, when someone comes into an agency to get help, we have questionnaires that we go through, and impact sheets – I guess they mean that. And "questioning". I mean, we teach students "Don't fire questions at people". [Reading from the unit] "Seek information from a range of appropriate sources to determine the range of issues that may be affecting the client within organisations policies and procedures regarding autonomy, privacy and confidentiality". That is a *huge* sentence. Like it's three lines long, and I've got no idea what they mean. "Examine all client information to determine the degree to which other issues may impact on the possible services that can be provided by the organization". I mean, they've got *something* in mind, but I'm not quite sure what it is! So that's the first element. "Determine the course of action to be followed". Well that's fairly self-explanatory. "Evaluate the benefits of providing a brief intervention in facilitating the client to access other services". I mean, that just means [Pause] "*Evaluate* the *benefits* of providing a *brief intervention* in *facilitating* the client to *access* other services". That means decide whether you should refer the client to somewhere else. … I think so'. [read it aloud another 3 times, in a tone of voice suggesting increasing disbelief] (Louise)

Despite her experience as a Community Services educator, and despite being a knowledgeable reader of Training Packages and other VET texts, in this vignette Louise reveals the work she and her colleague had to undertake to make sense of a single unit of competency. Training Packages are typically not texts that can be simply picked up and read; educators must work to 'unpack' them. At the time of my study, many interviewees described working with Training Packages that were written in passive voice. While the unit Louise is working with is in active voice, it is characterised by abstract language, complex and unfamiliar terms, and long complex

sentences, characteristics that were also described by other interviewees in my study. Such grammatical forms are not commonly used in everyday speech, but are often used in workplace documents that highlight organisational processes and omit the agents who enact those processes (Darville 1995, pp.254-257). Richard Darville argues that reading and responding to such texts requires the use of 'organisational literacy'; beyond simply understanding the words on the page, the reader must recognise what has been omitted, and must also draw on background knowledge of how the text will be used in organisational processes. Working with Training Packages requires vocational educators to use the organisational literacy of VET to 'unpack' their units and translate them into the language of teaching and learning.

'Unpacking' this unit is the first step in a work process in which Louise and her colleague must develop a training and assessment plan that will be subject to audit. There are no currently less than 17 national publications available online to support AQTF implementation (Training.com.au, n.d). Under the AQTF 2007, an RTO may undergo an external AQTF audit as part of the assessment of its initial application for registration, during the first year of operation (a 'post-initial audit'), after its first year (a 'monitoring audit'), if selected as part of a 'national strategic industry audit', when applying to renew or increase their scope of registration, or in response to complaints (Commonwealth of Australia 2007). In addition to these external audits, RTOs are required to show that they conduct internal audits of their organisation's compliance with the AQTF Standards. The local training and assessment plan being developed by Louise and her colleague must be available to be examined if required as part of any of these types of audit.

As with Training Packages, at the time of my study the AQTF was written in complex and abstract language that required interpretation. Despite (or perhaps because of) the substantial body of material available to advise RTOs on their preparation for audit, vocational educators in my study described an uncertain process where the interpretation of the AQTF standards resulted in inconsistencies in audit decisions. Fiona explains:

> 'I was audited *four times* in my last job, and every single audit brought totally different things up – there was no *consistency* in the application of the standards! One piece of documentation I had, one auditor thought "That was *fantastic*! That's great, that's best practice", another auditor'd come in and go "*That's* not right, and I don't like this". I go "Alright, fair enough", you know. And I think that's that whole ambiguity with that is "What the *hell* do you want from me? Just *tell* me and I'll do it!" And I think that's the frustration from practitioners. They say they're not changing the goal posts, but they *do*, you know, *all the time*. It's like *guessing* games a bit'. (Fiona)

The potential implications of being found non-compliant in an external AQTF audit are significant, with the most severe outcome being the loss of registration for one or more programs offered by the RTO. Clearly such an outcome would have a significant impact on both educators and students involved in the programs.

In their work of developing training and assessment plans and other AQTF documentation, Fiona and Louise participate in self-governance by developing accounts of their professional practice in a form that makes that practice accountable to both internal and external auditors. They are entering a circuit of accountability in

which they report on their local activities in terms that are meaningful within the national VET regulatory framework (McCoy 1998, p.407). Vocational educators must translate their local learning and assessment activities into categories and terms that are set up to be answerable to the institutional texts of the AQTF and Training Packages, and in doing this they often find they must reshape their professional practice.

In comments like "What the *hell* do you want from me? Just *tell* me and I'll do it!" (Fiona) and "we were told over and over by our management that we could lose our RTO status … You just feel a lot of pressure, and you're backed into a corner as a lecturer" (Louise), vocational educators signify their reluctant acceptance that their decision making authority in the context of their own professional practice is constrained by formal reporting requirements against which they (and their RTOs) will be judged and held accountable. The paradox here is that, in developing this documentation vocational educators experience a shift in responsibility in which they become directly responsible for elements of maintaining their RTO's official registration, but at the same time they experience an erosion of autonomy in that they must shape their local teaching, learning and assessment decisions using the frames and categories of the institutional texts rather than their professional judgement as educators.

Several educators in my study expressed frustration about being required to adopt and document local approaches which they deemed to be poor educational practice, such as being required to develop learning materials for students based on large and complex institutional templates which were designed primarily to provide documentary evidence for AQTF compliance. Throughout my study, educators described the complex work they did in order to comply with reporting formats while still meeting student needs. For example, where RTOs had introduced a procedural requirement that complex mapping documents which were developed for AQTF audit purposes be included without amendment in student learning materials, various VET educators described strategies such as putting these documents at the very back of the student materials in the hope that most students would not read that far, handing them out as separate documents on coloured paper with the instruction that reading them was optional, or loading them onto a server and issuing students with the access link only. These strategies illustrate the work that vocational educators undertake in order to navigate accountability circuits while still attempting to exercise their professional judgement. Yet even as they undertake this navigation work, educators accept the inevitability of being required to reshape and document their professional practice at the local level in order to achieve compliance and maintain RTO registration.

**Future directions: where to from here?**

Reflecting back on my original study, and reflecting forward to the future of VET, I wondered whether the issues identified in and conclusions posed in my study were still current or had been bypassed by developments. When I commenced my study in 2001 the AQTF was in its first iteration. Since that time AQTF 2005 and 2007 have come and gone, and the standards for RTOs are currently set out in AQTF 2010. This iteration of the quality framework is (self-)described as 'simplified and streamlined', and its focus is (self-)identified as being on 'outcomes' and 'quality assurance' (DEEWR 2010, p.3). This would appear to be in contrast with earlier versions of the

AQTF which one informant in my study criticised as having "created a situation where compliance equals bits of paper … what bits of *paper* are going to get [the auditor] off their back" (Taryn).

Similarly, the Training Package Development Handbook has been substantially redeveloped, and now includes an explicit statement that units competency should '*Use plain English*: Do not use jargon; unclear language and terminology beyond workplace requirements may disadvantage learners' (Training Package Development Handbook Guidelines n.d., p.5). In late 2010 I attended an information session on the new Training and Education Training Package, and participants at that session noted that the TAE competency standards are expressed in active voice, once again in stark contrast to the passive voice constructions typical of the training packages that most informants in my study worked with. As one interviewee commented: "Passive voice doesn't *mean* anything – it's not *you*. Passive voice is somebody *else*" (Barry).

With all these changes, it is tempting to assume that the findings of my study must have been bypassed by events. Yet when I talk about my research in a VET context, I am approached by people at all levels and in all roles within VET to say that little, if anything, has changed – and occasionally someone tells me that their own experience is that AQTF compliance has become more complex, less clear, and involves even more 'bits of paper' and increased uncertainty. Clearly, assumptions made in the absence of current data cannot be sufficient. Ten years after the commencement of my PhD study, I am revisiting the issues explored there. Approval has been sought through the Deakin University Human Ethics review process for a study in which I will interview people who are working with current versions of Training Packages and the AQTF, to explore the experiences of educational professionals working in vocational environments today.

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