

Valuing recognition of prior learning

Selected case studies of Australian private providers of training

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Key messages

The study set out to provide insights into the way eight private registered training providers in Australia understand, promote, use, support and value processes for the recognition of prior learning (RPL). The key messages relate to access to information, costs, policy issues, and assessment and auditing processes.

- The RPL process and supporting information need to be clear, concise and jargon free.
- The administrative costs associated with RPL, both in time and money, appear to be a significant disincentive for both candidates and providers and may be adding to the disadvantage experienced by equity groups.
- Effective RPL requires experienced professional assessors able to make informed professional judgments.
- The 'shelf-life' of qualifications and experience used for the purpose of RPL needs to be addressed, particularly in those industry areas like information technology where change is both rapid and pervasive.
- There is concern regarding the differences in standards of assessment among training providers, which may be a problem if a student is seeking a significant amount of RPL towards a qualification carrying the name of a new provider.
- The focus for assessment of RPL candidates should be on their capacity to perform 'the task' in the workplace to industry standards, not the elements of competency underpinning the task.
- The RPL process itself has the potential to provide students with positive outcomes, such as helping them understand their strengths, weaknesses and interests, and improving their confidence and motivation to learn.
- Information gained through the RPL process can be useful in assisting employers to maximise the potential of the candidate (their employee) within the business, and has the potential to aid the development of learner-centred training programs.

Executive summary

The nature of work and employment is changing rapidly and pervasively. As a result, there is an increasing emphasis on lifelong formal and informal education and training as a critical component in ensuring a highly skilled workforce that maintains and demonstrates currency of knowledge and skills. In this context, recognising the prior learning of students undertaking vocational education and training (VET) can make a significant contribution to providing the sort of responsive, relevant, and integrated learning necessary for the present and ongoing maintenance of a quality Australian workforce.

This research uses a case study methodology designed around a series of interviews with key personnel to provide insight into the way eight registered private training providers from across Australia understand, promote, use, support and value processes for the recognition of prior learning (RPL).

What is RPL?

There is no clear agreement among writers, researchers and major policy-influencing agencies regarding what RPL is, does or encompasses. Views vary from quite tightly defined notions of RPL as access to a training program or qualification, through to conceptions of it being a reflective process that can directly influence the nature of learning and the process of training. For the purposes of this study, then, RPL was considered to be a process that can:

- ✧ provide advanced standing into a training program or towards a training qualification
- ✧ contribute to the enhancement of learning and teaching in vocational education and training
- ✧ service both system/institutional and personal goals and needs
- ✧ support social growth, access, social justice, and lifelong learning.

Factors influencing RPL processes

The overriding issues highlighted by the staff interviewed for this study are the following:

- ✧ The RPL process and supporting information need to be clear, concise and jargon free. Complexity, as well as the appearance of complexity, appear to be major disincentives for students seeking RPL, and it further seems that many providers will not be motivated to promote and implement RPL as a valued process for students if they themselves must interpret complex, often imprecise and jargon-riddled policies and documentation.
- ✧ The administrative costs associated with RPL are seen to be a significant disincentive for both candidates and providers, and may be exacerbating equity concerns regarding access of disadvantaged persons. The concerns of providers towards the volume and impact of the administrative demands made upon them by 'the system' cannot be overstated. The issue, however, does not appear to be the amount of paperwork *per se* but rather the significant amount of that paperwork that does not appear to the providers to contribute in any obvious way to the quality of the training they provide, or to the quality of the training at a system level. There is also a significant concern among some of the providers interviewed that the cost of RPL has the greatest impacts on many of the disadvantaged people whose access to training it is supposedly assisting.

- ✧ The approach now commonly taken in the audit of registered training organisations against Australian Qualifications Training Framework standards is seen to be inappropriate and to devalue 'professional judgment', which is considered the most powerful assessment process for RPL purposes. It is the strong and pervasive opinion of those interviewed for this study that the audit process explicitly devalues professional judgment by highly qualified assessors by generally demanding comprehensive, detailed presentation of evidence with respect to elements of competency and generally rejecting subjective, holistic observations made of the performance of workplace tasks.
- ✧ The 'shelf-life' of qualifications and experience used for the purpose of RPL, particularly in some industry areas, requires consideration. The interviewees expressed concern that the rate, pervasiveness and depth of change in some industry areas—for example, sound, video and information technology—are such that even quite recently acquired qualifications and experience may no longer reflect accepted industry practice or standards.
- ✧ Considerable concern is expressed about the significant and obvious difference in standards among training providers when the national training agenda mandates the acceptance of assessments by all other registered training providers. This is not seen to be a major concern when the candidate is only seeking RPL for a small percentage of a training program because providers generally believe they can 'compensate for deficiencies before graduation'. It is, however, seen to be a major problem when the candidate is seeking a significant amount of recognition towards a qualification that will carry the name of the new provider.
- ✧ There is a concern about the increasing difficulty that RPL candidates will have validating experience as businesses move to electronic record keeping as paper files of all but the essential industrial relations and workplace conditions information are frequently discarded. This might leave candidates in the position of not being able to formally validate relevant experience if they cannot access electronic files.
- ✧ RPL can be a powerful process to assist student career planning. It can help candidates understand where their strengths, weaknesses and interests lie, particularly if the process has included direct interaction with workplace supervisors and mentors. This can help them map not only appropriate careers but also appropriate pathways for attaining their goals.
- ✧ RPL can have a significant impact on learner confidence and motivation. Through the RPL process, candidates can come to realise how much they already know and can do, and thus may try a qualification or training program that they otherwise might not have attempted, or at least would have approached with trepidation.
- ✧ RPL can assist significantly the development of learner-centred training programs. It can provide information and insights regarding what candidates already know and how each candidate learns best, which allows trainers to tailor the teaching–learning process to match learning styles.
- ✧ RPL can provide significant assistance to employers regarding the potential contribution of the candidate to the business. It is seen as a very effective way of assisting senior staff of the business to understand the existing knowledge, skill and experience of the candidate (their employee) so that, in turn, the business can make maximum productive use of the employee.

Key themes

The following key themes, with significant implications for training policy, are argued to span these issues:

- ✧ There are significant advantages of RPL that lie in the potential use by students, trainers and employers of the information gained through the process itself, not just in the advanced standing that it may provide towards a qualification or program of study.

- ✧ Effective RPL requires experienced professional assessors able to make informed professional judgments.
- ✧ The current high administrative costs of RPL and the subsequent cost impost on candidates may be operating to decrease the relative access of candidates from disadvantaged groups.
- ✧ There is a perception that it is not worth the effort to promote RPL because of the amount of paperwork that will need to be completed to fulfil the requirements of the auditors.

Background

Purpose of the study

The purpose of this study is to provide insights into the way that a small selection of registered private providers of training in Australia understand, promote, use, support and value processes for the recognition of prior learning (RPL).

It is hoped that the practices, perceptions, strategies, issues and challenges presented through the eight case studies will assist training providers and policy-makers to improve the access of learners to, as well as the quality and effectiveness of, RPL.

Context for RPL

The nature of work and employment is changing rapidly and pervasively in a global economy where the fundamental sources of wealth have moved from the ownership and exploitation of natural resources to the created resources of knowledge and communication (Lunn forthcoming; Smith & Riley 2003; Stewart 1997). Competitive advantage now lies in the ability of businesses to respond rapidly and flexibly to change (Howkins 2001). Consequently, workforces are varied by 'hiring and firing', redistributing work, outsourcing or subcontracting in order to secure the right mix of expertise (Department of Industry, Science and Resources 2000; Karpin 1995; Worldwide Study on Innovation 1999).

As a result, there is an increasing emphasis on lifelong formal and informal education and training as a critical component in ensuring a highly skilled workforce that maintains and demonstrates currency of knowledge and skills (Graham 2003; Lunn forthcoming). The traditional notion of obtaining one set of skills or qualification(s) that would suffice for a lifetime of permanent employment, generally with the one employer, is no longer the dominant model (Howkins 2001; Nicolescu 2002). As Ellyard (2002) notes, the employee of the 21st century increasingly must be a job-maker, not just a job-taker.

Contemporary employees require the capacity to work across a range of contexts and contents in 'a fully integrated and relevant way' which acknowledges that 'life, content, ideas, and knowledge are not divided into separate, segregated clusters' (Spady 2003, p.18). Consequently, training providers, policy-makers and curriculum developers need to acknowledge that the present, past and even future 'real life experiences' of those undertaking training are an inseparable and essential ingredient of a quality training program (Kearns 2001; Lunn forthcoming; Spady 2003). It follows, then, that recognising the prior learning of students can make a significant contribution to providing the sort of responsive, relevant and integrated learning frameworks necessary for the present and ongoing maintenance of a quality Australian workforce (Callan 2002; Kearns 2001; Spady 2003).

In this context, the Australian Qualifications Framework commits to supporting and developing training pathways that integrate RPL, with one of the key objectives listed on its web site being to 'help with developing flexible pathways … by providing the basis for recognition of prior learning, including credit transfer and work and life experience'.

Literature review

Defining RPL

On its web site, the Australian National Training Authority (ANTA 2003) defines recognition of prior learning as 'recognition of competencies currently held, regardless of how, when or where the learning occurred'. Evidence may include 'any combination of formal or informal training and education, work experience or general life experience', and may take a variety of forms, including 'certification, references from past employers, testimonials from clients and work samples'. The assessor must ensure that 'the evidence is authentic, valid, reliable, current and sufficient'.

The ANTA definition places a significant emphasis on the nature and processes of assessment, and is heavily focused on system and institutional administrative needs. It is essentially silent with respect to stating the purpose(s) of RPL, and makes no overt link between recognition and the learning/training process itself. The definition also does not provide any overt statement about how RPL can contribute to notions of access and/or equity. Interestingly, given ANTA's publicly stated policy position, the definition does not specifically identify a functional link between RPL and workplace learning or workplace competencies. In summary, then, the ANTA definition provides an administratively focused view of RPL, emphasising notions of rigour, standards and quality control but placing little overt emphasis on links between RPL and the quality of learning in vocational education and training (VET).

Wheelahan, Miller and Newton provide a somewhat broader perspective on recognising the prior learning of students, suggesting it is a process that 'assesses the individual's learning to determine the extent to which that individual has achieved the required learning outcomes, competency outcomes, or standards for entry to, and/or partial or total completion of, a qualification' (2002, p.4). Furthermore, they suggest it is 'an access mechanism when the normal education or qualification prerequisites are not present' (2002, p.4). In fact, they clearly separate the notion of RPL from that of credit transfer, which they define as a mechanism that:

> assesses the initial course or subject that the individual is using to claim access to, or the award of credit in, the destination course to determine the extent to which it is equivalent to the required learning outcomes, competency outcomes, or standards in a qualification.
>
> (Wheelahan, Miller & Newton 2002, p.4)

The Wheelahan, Miller and Newton definitional framework still is heavily assessment and qualifications driven, although interestingly, considerable discussion occurs later in their report regarding the potential links between both RPL and the enhancement of learning and teaching, and notions of improved access and equity.

The Australian Qualifications Framework Advisory Board suggests that RPL 'involves a case-by-case assessment of the individual's knowledge and skills, which may be derived from a whole range of learning experiences, including workplace learning and general life experience' (1997, p.13). While still being assessment driven, the board's definition further broadens the notion of RPL by overtly targeting the assessment of each individual rather than groups of individuals. The focus of assessment, however, is primarily technical knowledge and skills rather than generic employment attributes—potentially a major omission from the RPL process given the plethora of recent research identifying the importance employers and industry in general give to generic workplace competencies (Australian Chamber of Commerce & Industry 2003; Callan & Terry 1997; Hager, Garrick & Risgalla 2001; Gallois & Callan 1997; Kearns 2001; Senge et al. 1999; Smith & Navaratnam 2002).

The Department of Education, Science and Training (2003) definitional framework introduces the notion of purpose by asserting that individuals seek RPL for one of three reasons:

- ✧ to gain entry to a training program or qualification pathway
- ✧ to obtain credit for components of a training program

- ✧ to gain recognition for overseas qualifications (or a level of professional standing) that has not been endorsed through the National Office of Overseas Skills Recognition or another relevant statutory body.

The reasons proposed by the Department of Education, Science and Training (2003) for individuals seeking RPL, however, essentially reflect a system/administrative perspective that does not overtly consider the needs, expectations or motivation of individual learners. In particular, the above purposes of RPL proposed by the Department of Education, Science and Training do not encompass the actual processes of learning and training.

The Organisation for Economic Co-Operation and Development (OECD) review of the role of national qualifications frameworks in promoting lifelong learning also places a major focus on the link between recognising the prior learning of students and qualification outcomes, arguing for the need to 'improve opportunities for people to use their informal learning to gain recognised qualifications' (Young 2001, p.4). Furthermore, the OECD review adds the concept of articulation to the concepts of RPL and credit transfer, defining articulation as 'opportunities for mobility and progression between different types of qualifications and between qualifications for different occupational sectors' (Young 2001, p.4). Additionally, the OECD sees RPL (and the associated notions of credit transfer and articulation) as being 'intrinsic to lifelong learning', the creation of opportunities, and the provision of access (Wheelahan, Miller & Newton 2002, p.3). The OECD also asserts that RPL is itself a 'learning concept' that must be 'personally meaningful' and have 'social recognition and status'.

The OECD framework positions RPL as both an assessment and a learning process. It provides an holistic view that incorporates system and institutional demands and personal goals and benefits for individual students. It is also suggestive of a social capital model (Kilpatrick, Falk & Hamilton 2001) in that the process ultimately has the capacity to leverage continuous improvement for communities, not just individuals and the businesses that employ them.

The OECD 'framework' moves away from a 'definitional approach' which addresses what RPL is to a 'framework approach' which seeks to convey what it does. Smith and Keating (1997), who focus their discussion on the use of RPL, also adopt this approach. They broadly designate RPL as determining current competency in the workplace and as a learning process in its own right. Although they take the rather limiting view, particularly in lifelong learning, that the focus of the learning process should be on how the student best can meet the prescribed learning outcomes of the particular subject, course or training program.

In line with the definitional frameworks discussed above, Wheelahan, Miller and Newton note that 'the literature mainly focuses on supporting students through the assessment process' (2002, p.12). They comment that while 'the intention of incorporating RPL as part of a broader assessment process was to incorporate it holistically into learning and assessment', the result has been 'insufficient attention paid to the process of how prior learning can be included' (2002, p.12). Their paper develops the argument that the overwhelming focus of RPL on assessment may well limit the extent to which it is used because people may 'be unaware of what they know and the extent to which they know it' or 'not have the language to describe what they know' or 'not be able to move from the discourse of their everyday practice to the discourse required to substantiate their claims' (2002, p.13). Importantly, they claim that all three of their proposed reasons are 'more likely to disadvantage students from non-traditional backgrounds' (2002, p.13). This perspective is supported by Harris, who argues the importance of positioning RPL 'within the changing socio-economic and cultural conditions of late- or post-modernity and to see it as a social practice rather than as a set of seemingly innocent and benevolent procedures' (1999, p.124).

The major problem, argue Wheelahan, Miller and Newton, is that RPL, as practiced in the VET sector, primarily requires students to translate their industry-based practice into an academic discourse that requires students to understand and articulate notions such as 'competency standards, elements of competency, performance criteria, evidence and range of variables … codes, and

institutional processes' when their education and work backgrounds have not provided significant development of this specialised skill (2002, pp.13–14).

In the context of Australian vocational education and training, perhaps the most holistic definition of RPL is provided by Hager (1998). He defines RPL as a process for recognising:

- ✧ informal learning as credit towards formal qualifications
- ✧ among educators and trainers that other knowledge is valuable
- ✧ by the learner that learning has occurred (self-recognition)
- ✧ the significance of the many relevant contextual factors.

As with the OECD definition, Hager's definition overtly recognises the existence of a link between the RPL process and the teaching and learning processes in vocational education and training. Essentially, however, Hager's notion is that RPL can act as an adjunct to teaching and learning in vocational education and training, and so stops short of asserting that it can actually promote the quality and productivity of those processes.

In summary, then, there is no clear agreement among writers, researchers and major policy-influencing agencies regarding what RPL is, does or encompasses. Views vary from quite tightly defined notions of RPL as access to a training program or qualification, through to conceptions of RPL as a reflective process that can directly impact on understandings and applications of the learning process, both for learners and trainers. Consequently, it was regarded as highly likely that the training providers interviewed as part of this study would also hold a divergent range of views about the appropriate definitional framework for recognising the prior learning of students. For this reason, it was considered that an important contribution of the study would be to identify whether and how various private providers of training in Australia believe that RPL can:

- ✧ contribute to both advanced standing towards a qualification and the enhancement of learning and teaching in vocational education and training
- ✧ service both system/institutional and personal goals and needs
- ✧ support social growth, access, social justice, and lifelong learning.

Factors promoting effective RPL

There is a dearth of evidence-based information regarding the strategies, processes and practices that are likely to promote effective RPL (Bateman & Knight 2001; Pithers 1999; Ryan & Watson 2001; Smith 2000; Wilson & Lilly 1996). The assumption appears to be that RPL as a concept and as promoted is, in itself, the basis for effective implementation, and that if the outcomes are less than anticipated or desired, the trouble lies with imposed barriers rather than with any deficiencies in the implementation model itself. As Wheelahan, Miller and Newton note, 'several authors make the point that the promoted benefits of RPL are assumed to be actual benefits, but that very little research has been conducted to determine whether the claims have been realized' (2002, p.10).

The Australian Qualifications Advisory Board study (cited in Wheelahan, Miller & Newton 2002, p.10) found that 'the Australian literature shows that the take-up of RPL has been relatively low'—a finding supported by several other Australian researchers such as Keating, Kelly and Smith (1998), Pithers (1999), and Thomson, Saunders and Foyster (2001). Furthermore, the study found that RPL 'has not acted as a mechanism for social inclusion for disadvantaged groups' (Wheelahan, Miller & Newton 2002, p.13)—an allegation strongly supported by the Australian Indigenous Training Council's submission to the Nelson Enquiry into Higher Education (Andersen 2002). While targeting the failures of RPL provision, however, these reports do not offset their findings with any rigorous research-based evidence as to what might be factors that, individually or collectively, promote success, and why.

Interestingly, Whittacker and Cleary (2002) argue it is possible that much more effective RPL may be occurring than we currently know about but our existing recording mechanisms are not geared to capture much of what is actually happening in practice, particularly with respect to the learning process.

In summary, then:

- there is little in the literature that focuses on the factors that actually promote effective RPL
- RPL policy and practice in Australia appears to be running on the principle that RPL itself is its own promoter of participation
- less than effective RPL is generally viewed to be related to the presence of barriers, rather than a lack of promotional strategies or practices
- RPL generally is viewed as operating at a less than satisfactory level in Australia.

Factors inhibiting effective RPL

A number of major reviews and research projects have been conducted into the factors that inhibit the implementation of RPL in the context of Australian vocational education and training (Bateman & Knight 2001; Cretchley & Castle 2001; Hager 1998; Ryan & Watson 2001; Smith & Keating 1997; Wheelahan, Miller & Newton 2002). These studies generally agree that the key factors inhibiting the effectiveness of the RPL process in Australian vocational education and training include (in no defined order of priority):

- the excessive time and cost required to conduct recognition of prior learning using current approaches
- the time and cost impost required to support students through the RPL process
- staff concerns about validity, reliability, equivalence, and quality assurance in general often seen to result in an environment of excessive 'rigour' which in turn escalates cost and time, and acts as a disincentive to prospective students
- debate, often bordering on pontification, about whether recognising the prior learning of students is appropriate for all areas of training, often leading to it not being offered at all
- the significant level of staff experience and expertise needed to effectively conduct recognition of prior learning, which may be beyond the available resources of the provider
- the excessive cost of providing one-on-one staff assessment, as required by many current approaches
- staff and industry resistance to the concept (not 'traditional training', and thus 'not rigorous enough' or 'proper')
- variations in funding levels and policies across states
- state-level implementation policies that in some cases actually result in a significant financial loss to institutions to offer recognition of prior learning
- the effect on timetabling, viable class sizes and teaching processes, and the resulting cost burden, of having students provided with differing amounts of credit within a training program
- onerous bureaucratic procedures to be followed, particularly paperwork for audit requirements (often, it is claimed, in excess of the Australian Quality Training Framework Guidelines for audit)
- certain industry and professional bodies that stipulate—often without educationally defensible reasons—maximum amounts of credit through RPL
- the fact that it is still often easier and more time and cost effective (both from the perspective of the student and the institution) if the student enrols and proceeds through the course as 'normal'.

(See also Wheelahan, Miller & Newton 2002 and the Australian Qualifications Framework Advisory Board 2002 for a detailed review of the literature on RPL.)

Methodology

This study was designed around a series of one-hour face-to-face interviews with key personnel involved with recognising the prior learning of students at each of eight registered private providers of training from across Australia. All personnel interviewed were informed that the participation of their organisation in the project was voluntary and could be terminated at any time and the final report would not identify their organisation unless they consented in writing. Because of constraints on the scheduling and location of the case study research, it was not feasible to include formal interviews with relevant students in the research design for this study. Nevertheless, some of the providers were in a position to involve students with experience of the RPL process in informal discussions with the researcher. Generally, student opinion did not vary significantly from the perceptions of the staff interviewed.

The particular organisations were chosen because of their potential to provide a range of interesting and 'different' perspectives on the nature and effectiveness of processes for the promotion, implementation, and use of RPL. Selections were made on the basis of feedback received by the researcher from contacts in state training agencies, the Australian Council for Private Education and Training, and industry. The selections should in no way be viewed as representative of the practices or views of private training organisations across the nation, nor should they be viewed as a judgment by the researcher on the relative 'quality' of the organisations.

The eight organisations chosen for the case studies, with a brief statement to convey the major reason(s) for the choice, were the following:

- *Competency Based Learning* is a major provider of training in the power and electricity industries, both nationally and internationally. Its programs are frequently 'joint badged' with other training providers and/or universities, and thus its RPL processes must be extremely flexible in order to meet the scope of their application across institutions, sectors, states and even countries.
- *Martin College*, one of Australia's largest private providers of training, has campuses across Australia. It offers training in a wide range of areas, including business, management, marketing, legal services and information technology. It has a significant number of international students.
- *Business Success Group* is an organisation whose operations include the difficult environment of rural and remote locations across south-west Queensland. The particular challenges for recognising the prior learning of students across that operating environment are significant.
- *Hortus Australia* is a national rural industry training organisation that has established efficient and effective RPL as a cornerstone of its business. Its services are widely sought across the nation.
- *The Southern Cross Connection* is an organisation positioning itself as a major provider of training for the emerging area of aged care. Applicants for training in this industry usually bring with them a wide variety and depth of experiences, and have a great demand for RPL for those experiences.
- *ACNM Pty Ltd* is a major national provider of training from VET certificates through to higher education degrees in a wide variety of alternative medicine areas. Many of its students are already practitioners seeking recognition of their practice and competence, and many seek recognition of experience—not just qualifications—gained overseas.

- *JMC Academy* is a highly successful training organisation in the relatively new training area of entertainment technology. It is heavily industry based yet it has already established an international reputation for the quality of its students.
- *Captain Cook College of Hospitality Training* is a pseudonym for an established private provider of training in the field of tourism and hospitality. The organisation indicated a willingness to participate in the study but did not want its name publicly linked to the comments made. Captain Cook is located in a capital city. It has a rigorous yet flexible process for providing RPL to students, particularly those with a strong industry background. It markets the accessibility of RPL as one of its 'draw cards' for students.

The interviews were constructed around the following ten open-ended questions:

- Please outline the general approach taken by your organisation for the granting of RPL. Why have you taken that approach? Does it vary according to the level of qualification or the amount of RPL being sought? How?
- How do you go about marketing RPL to prospective students? Why have you taken that approach? How successful do you think you have been? Why?
- What structures or processes do you have in place to support students through RPL?
- Who is responsible for RPL in your organisation? Why?
- What do you believe are the key factors that promote, or that could promote, effective RPL? Why?
- What are some of the things you believe a provider should avoid doing if they are to maximise the success of RPL?
- Do you think RPL is making as big an impact on training in Australia as perhaps it should or could? Why?
- Is the RPL you conduct in this organisation cost-effective? Please explain.
- Is the RPL you conduct in this organisation sufficiently beneficial from a student's perspective? How do you know this?
- Can you give one or two anecdotes of really successful instances of RPL; that is, cases which have really worked well, or worked in a particularly difficult set of circumstances?

The interview schedule was trialed with two private providers of vocational education and training and was found to be effective in providing rigorous and comprehensive information relevant to the purposes of the study.

The set of case studies was then analysed in order to identify dominant themes and issues regarding the effective implementation and use of RPL. As well, any particular processes, concepts or suggestions were looked for that might have the potential to have a positive impact on policies and practices at either system or provider levels in Australia.

The case studies

Case study 1: Competency Based Learning

Competency Based Learning is a Gold Coast-based company, primarily operating in the power and electricity industries. It has significant activity in most states and territories, and very substantial international markets. Much of its approach to training, particularly in off-shore markets, involves collaborative delivery and 'joint badging' of qualifications.

The focus of its activities is with companies and corporations rather than marketing and offering training for individuals. Competency Based Learning places an educational emphasis on helping companies and corporations develop processes for managing their own quality training systems.

Training for the electricity supply industry faced an interesting initial dilemma in Australia because workers in the area traditionally did not generally possess formal qualifications. The questions, therefore, were: 'How can trainers deliver qualifications they do not possess themselves? And how can trainers who do not have relevant qualifications develop the training resources in the first place?'.

Competency Based Learning solved the dilemma on the basis of work it had previously done with Shell in Boston. Shell had previously developed competencies for the industry in the United States, and Competency Based Learning—which is affiliated with a similar provider in the United States—had assisted in the delivery of the competencies. Consequently, as a company it received a special dispensation from the audit area of the Department of Employment and Training in Queensland to assess the competency of its own people in Australia. Once a team of local trainers had been accepted through this special RPL arrangement, they were then qualified to develop the relevant training package for the power industry and, in turn, to train and assess other trainers for the industry. The resulting training package consists of 58 units in electricity generation and 22 units in health, safety and environmental issues.

Competency Based Learning places the onus on individual candidates, in the workplace, to present evidence based on the standards for the purposes of recognition of prior learning. Candidates are encouraged to prepare a portfolio that outlines the element(s) of competency for which RPL is sought, the performance criteria required, and information on how they believe they achieved the necessary level of knowledge and skills. A list of referees, including a line supervisor who has worked in the field with the candidate, is required. The organisation follows up a review of the portfolio with an interview with the candidate and usually at least the line supervisor. Wherever possible, the process occurs at the actual work site, with the prime emphasis on the capacity to do the task in the workplace.

An interview with senior staff of Competency Based Learning provided the following insights and opinions:

- ✧ Cost ineffectiveness associated with RPL is a major disincentive. The major costs, however, are not in RPL itself, but in completing the massive administrative paperwork requirements. 'This is a very frustrating issue, not because audit is not important, but because so much of what they require, and how they require it, does not appear to value add to the quality of training for the candidate'.
- ✧ Much more emphasis needs to be placed on the professional judgments of direct supervisors for RPL, particularly where the quality of delivery is linked to legislated standards for the industry

(as is the case with power generation). Ultimately, 'many of the really important elements of practice can't be documented directly, and many of the tasks can't be broken up into bits to be recorded for assessment without placing question marks over the ability to still do the work-based tasks at the standard required by the industry'. This means the key emphasis for auditors 'should not be on the quality of the candidate, but on the quality of the assessor and supervisor'.

- ✧ There is too much emphasis on 'the one right way' for recognising the prior learning of students. Auditors often look for 'the evidence', rather than allowing the flexibility of practice and demonstration of quality that occurs in 'real workplaces'. Local environments and local issues 'require contextualised, not generic, solutions, and the quality employee demonstrates that'.
- ✧ If RPL is to be done properly, then 'we must be prepared to knock back assessments. Unfortunately, for too many providers, money making is corrupting integrity. Also, there is far too much looking after the mates with RPL—people getting credit that they simply don't deserve, and that's not just unfair, it's bad for Australian industry'.
- ✧ It may be useful not just to report how much recognition of prior learning occurs, but also to report success rates. Part of driving quality in RPL could be linked to notions of 'reasonable' success rates for applications. 'The provider who gives RPL to everybody should be investigated. So should the provider who hardly gives any RPL to anybody.'

Case study 2: Martin College

Martin College is part of Study Group, a major international provider of training programs with colleges in Australia, the United Kingdom and the United States.

In Australia, Martin College offers certificate, diploma and advanced diploma programs at campuses in Sydney, Parramatta, Brisbane, Cairns, Gold Coast, and Perth. Programs are offered in the following: management, marketing, legal services, executive secretarial, technology support, international business, travel and tourism, event management, business, graphic design and information technology. English language support is provided through its affiliate Embassy CES English Language Training Centres. Articulation arrangements have been established for Martin College graduates with a number of Australian universities.

Every student at Martin College is informed at the time of enrolment of the nature and availability of RPL and of the process for seeking credit. It is not, however, formally used as a marketing tool for college programs. The key message promoted to students is that RPL can reduce the cost and time of their training programs.

Martin College does not charge students for RPL assessments. If prior learning is approved, however, students are offered the option of picking up alternative 'subjects' of their choice for the same cost as the original course.

Generally, the college places a 20% to 25% limit on the amount of credit that can be given towards a qualification for prior learning. The director of academic studies could only recall one case in which the college granted a student an entire VET qualification on the basis of RPL, and that person had very extensive and extremely successful experience in a high-level managerial role.

The director of academic studies and the dean of students assume responsibility for oversighting RPL processes at Martin College. The college principal must sign off all applications. This rigorous process is deemed necessary to ensure credibility of the process with students and industry clients.

The director of academic studies provided the following reflections on the nature and use of RPL from the perspective of Martin College:

- ✧ It is often very difficult to be fair when granting RPL on the basis of reported experience because of the different tasks required of people doing the same job in different organisations, and the different levels at which people are expected by different employers to perform those tasks. Consequently, it is often necessary to probe the student's experience further. Wherever possible,

however, this is best done by setting an assignment that requires application, rather than by detailed 'testing', because, ultimately, what is important is the ability to perform the task at the required standard. For this reason, in skills areas, students are often simply asked to 'perform the task' for the college assessor.

- ✧ There is a particular issue with granting recognition of prior learning for students who have undertaken studies at Certificate II level at school because of sometimes quite significant differences in the standards that have been met. This particularly applies to the area of workplace communications.
- ✧ There is a significant issue with 'shelf life' and granting RPL on the basis of reported experience or past studies, particularly in industries experiencing rapid change such as information technology. In this respect, there is sometimes a distinct advantage in students undertaking the training course because they will learn 'new things and the latest ways of doing them'.
- ✧ RPL needs to be 'easy for the student and easy for the trainer'. One-on-one can be expensive if the base of prior learning and experience is complex and/or somewhat nebulous. In some cases, however, it can be very easy and cost efficient. For example, Martin College recently found it very easy to provide RPL for management competencies for a retired female army officer who possessed an army management qualification and had six years of detailed performance reports on her experience as a manager.
- ✧ The 'real positive of RPL is that it helps prevent students dying of boredom', which leads to absenteeism and/or a poor attitude to learning.
- ✧ A 'real strength of RPL is that it is, in a sense, a mini training needs analysis'. It provides direct feedback to students about what they can and can't do, and where their strengths and weaknesses lie. In this sense, it can be a powerful careers counselling process. It also provides invaluable feedback to teaching staff about 'what needs to be done to help students learn best, and about the most appropriate strategies for teaching particular students or groups of students'.
- ✧ The level of documentation required to be kept for the purposes of audit, and the focus of audit on 'the bits rather than the task', is a disincentive to providers to engage in RPL, particularly as many applications are best assessed by professional judgments which can not be easily or adequately described in the written form.

Case study 3: Business Success Group

Business Success Group is a Toowoomba-based private training provider offering programs in assessment and workplace training, management, business, information technology, financial services, local government, community services, public services, telecommunications (call centres) and retail. The area serviced by Business Success Group includes the difficult environment of rural and remote locations across south-west Queensland.

Business Success Group is also a contracted New Enterprise Incentive Scheme (NEIS) provider for the Department of Employment and Work Relations. The scheme is designed to assist unemployed people establish new businesses. It provides income support to unemployed people who might otherwise be deterred from setting up a business. In this way it creates new, independent, small businesses that otherwise would not exist.

Business Success Group only occasionally has students seeking advanced standing through RPL, in part because it believes that it has been poorly marketed by 'the system' and thus is not widely known or understood, particularly outside major metropolitan regions. The organisation makes students aware of RPL at the time of enrolment, but does not market the process with any degree of enthusiasm because it feels 'uncomfortable about asking the students to pay for the service'. Significant direct (face-to-face or telephone) support is given to students seeking recognition of prior learning, particularly in terms of constructing and presenting their portfolios.

The directors of Business Success Group, along with senior members of staff, made the following observations during interviews:

- ✧ Recognition of prior learning is 'a relationship thing'. It works best when there is open communication between the student and the assessor, with the student genuinely believing the process is designed to significantly benefit him or her during the training program, and the assessor being in a position to fulfil that expectation.
- ✧ 'The system' is failing stakeholders, not just students, by making the process 'too hard, too complex, too slow, too costly'. Students with significant industry experience who are used to a business environment driven by rapid, relevant, high quality responses are 'often offended by how pedantic the system for RPL is required to be'.
- ✧ Quality RPL decisions require the training organisation to have detailed information not just about the candidate but also about the businesses for which the candidate has worked. If the training organisation makes a 'professional judgment' that the business is reputable and successful, then employer assessments can be given high credibility and additional assessment of the candidate can be minimised or perhaps even eliminated for the purposes of granting prior learning. Alternatively, if there are concerns about the quality of the business providing testimony about the quality of the candidate, then the training organisation must conduct quite a rigorous program of further assessment—including visits to the work site—before it can, with any degree of confidence and credibility, grant RPL. 'The system-required' processes and audit fail to take this into account.
- ✧ The evidence required for assessment is driven too heavily by the requirements of audit and 'its excessive emphasis on documentation'. If RPL is to work, there must be much less emphasis on paper-based recording and much greater emphasis on holistic assessment processes and the attendant requirement for 'professional judgment by professional assessors'. There is a 'ridiculous level of quite questionable detail' required by many auditors, resulting in 'quite inappropriate "black–white", "yes–no" assessments of workplace competence'. The Business Success Group believes that in spite of the rhetoric, 'professional judgment is devalued by 'the system', or at least by those who are administering it'.
- ✧ RPL should focus much more clearly on validating claimed workplace credibility rather than assessing at a theoretical level the elements of competence. There is a distinct difference between the person who is 'out there doing it' and the person who is 'seeking the basics necessary for accessing the workplace', and RPL—and in particular those who audit the process—should promote the flexibility necessary to professionally acknowledge that difference for the candidate.
- ✧ There is a real problem in that the paper-based recording requirements of RPL promote an 'academic dialogue for assessment' which often militates against highly performing employees who lack the 'academic skills to play the assessment game'.
- ✧ People who have been working for a long time often have difficulty validating much of their experience 'in writing' because many employers have simply discarded their 'old' paper-based personnel records when they have converted to electronic databases. Furthermore, it is often difficult or inappropriate to access private information from businesses for RPL claims, for example budget information from a restaurant.
- ✧ One of the really positive outcomes of RPL is the link it can have in promoting the confidence among students to undertake further training. The process can assist in 'proving' to a student 'what they have already done or achieved, or have the ability to do in the future'.

Case study 4: Hortus Australia

Hortus Australia is a registered training organisation operating in all states and territories of Australia and is the leading national provider of assessment services to rural industries. Hortus Australia received the 2000 National Assessment Award for 'exemplary assessment practices'.

Hortus Australia specialises in assessment and training for agriculture (including rural business management), amenity and production horticulture, land and natural resource management, administration, and workplace training and assessment. It also has some limited involvement with training for the seafood industry. The company is based in South Australia.

Hortus Australia actively markets the advantages of RPL, and ways of accessing it, through industry journals, presentations at industry conferences and workshops, and formal alliances with industry associations. In particular, it targets rural managers to 'champion' RPL with their staff, and to use it as a 'mini skills audit'. People who contact Hortus Australia seeking recognition of prior learning are sent a package containing all the required documentation and support information. Ongoing telephone support is provided to the person throughout the application and evaluation, and a free-call number has been set up for this purpose.

Usually, the prior learning assessment process culminates in a visit by a Hortus assessor to the candidate's work site so that the evidence presented in the portfolio can be evaluated in the context of the workplace. The interview/visit usually takes in the order of three to six hours, and candidates are provided in advance with indicative questions that will establish the appropriate breadth and depth of underpinning knowledge. Where employees are involved, the workplace assessment usually takes place in the presence of the line manager who can 'directly validate claims, act as an advocate for the candidate, and prompt the candidate if and when necessary'. Referees are contacted on specific issues, not to make general comments. They may also be sent a form to sign confirming the claims of the candidate. The focus of the whole process is what is expected by industry in industry, and that the candidates can demonstrate they meet those expectations. Partly for this reason, no time limit is set on the candidate for the presentation of evidence for recognition of prior learning.

Hortus Australia emphasises the quality of the workplace when making a decision about the validity of the evidence presented. For this reason the organisation asks, wherever possible, to be given a tour of the workplace. During this time the assessors informally evaluate the quality of practices at the work site which, in turn, allows them to judge how confident they can be in the candidate's supervisor's assertions.

Most of the RPL applications which come to Hortus Australia are at Australian Qualifications Framework level 4 or above. The company believes there are three major reasons for this:

- there is more personal and professional 'gain' for candidates at those levels
- many people in the industry now already have qualifications at levels 2 and 3, particularly with the VET programs now running in schools
- it is at the higher levels of the rural industries where workplace skills are most obviously exceeding the qualifications currently held.

Recognition of prior learning is directly overseen by the three directors of Hortus Australia as evidence of the importance the company puts on the process. Interestingly, of all the case studies conducted for this study, Hortus Australia was the only organisation to have put in place a dedicated evaluation and feedback mechanism involving relevant stakeholders in order to assess and improve the quality of its RPL processes. Furthermore, Hortus Australia has a formal process of probation and mentoring for staff who will be involved as assessors.

One of the directors of Hortus Australia made the following observations about the RPL process:

- The key to success is quality judgments by quality professionals, not massive amounts of documented 'evidence' that 'takes an inordinate amount of time, costs an inordinate amount of money, and ultimately, does not necessarily tell us much, or at least anywhere near enough, about what the candidate can actually do, and how well they can do it, in the workplace'.
- The process must, 'at all times and in all respects, be clear, precise and jargon free'. It must also be 'as flexible as possible to accommodate the different backgrounds of the candidates and the different environments in which they work and the different purposes for which they are seeking RPL'.
- Time taken is a 'critical element of RPL. Assessments should not be excessively long, but should be long enough to ensure rigour and quality'.
- There are still huge opportunities for implementation of RPL in the Australian workforce. For example, 'when the OECD says qualifications in rural Australia are low, they are referring to

formal qualifications and not the skills and knowledge of operators that could potentially be addressed through RPL'. Furthermore, it might be a significant medium for 'organisational development. It lends itself to enterprise agreements. It helps clarify staff functions at different levels, and job roles across the organisation'. It can be a 'strong motivator for encouraging self-improvement by helping make people feel valued for what they already know and can do', and a 'significant tool for change management'.

- ✧ The process can benefit candidates in helping them collate and present evidence of knowledge and skills that, in turn, can help in other areas of their work, such as with preparation of job applications.
- ✧ RPL can be a significant advantage to a business by providing managers and supervisors with detailed information about the knowledge, skills and experiences of their staff which is well in excess of their pre-existing knowledge but may be constructively and profitably used by the business at a future time.

Case study 5: The Southern Cross Connection

The Southern Cross Connection is a relatively small private training provider operating out of the Gold Coast, Brisbane and Gympie in south-east Queensland. Prior to this year, the core of its business was the offering of the Certificate IV in Assessment and Workplace Training, the Diploma in Training and Assessment, and the Diploma in Business (Frontline Management).

From 2004, however, people operating in the area of aged care will need a formal qualification at certificate III level. Consequently, the organisation is establishing a major focus on the delivery of the Certificates III and IV in Aged Care and Disability Studies. Given the extent to which the industry depends on older volunteers with significant experience in supporting the aged, and the increasing extent to which the federal government is funding aged care in the home, RPL is viewed by the Southern Cross Connection as a critical process for its training activities.

The Southern Cross Connection promotes RPL as an integral part of its marketing strategy. Much of this marketing involves talking to potential students in their workplaces, so that a mechanism for providing advanced standing for what they are doing and what they have done has significant relevance and impact because it is being discussed in the physical and emotional environment of where they work.

The Southern Cross Connection provides the 'standard' portfolio development option for those seeking RPL. It also, however, exercises two other very interesting approaches:

- ✧ People in the aged care industry who are seeking a Certificate IV in Assessment and Workplace Training are offered the opportunity to assist in the development of course materials for aged care training and are given appropriate credit towards the certificate IV for their contribution.
- ✧ The interactions occurring during professional development sessions run for aged care workers are monitored for the extent to which they can provide information which can contribute to RPL.

Senior staff of the Southern Cross Connection raised the following issues about RPL during interview:

- ✧ Workers in the aged care industry have been doing many tasks extremely well for a very long time, but they have been doing many of those tasks intuitively. It is important to recognise existing areas of competence as a way of encouraging what is largely a volunteer workforce to participate in the new, regulated qualifications regime. Of equal importance, however, is the need to provide strong support to aged care workers so they can recognise and value what they already know and can do.
- ✧ Setting students an assignment that asks them to apply what they already know towards the solution of a particular problem or issue has been found to be a very effective way of finding out the 'intuitively held' knowledge of many people.

- ‘Shadowing’ the student in the workplace, recording what is done and why, has been found to be a very effective mechanism for identifying existing knowledge and skill.
- Effective RPL which genuinely reflects the on-the-job knowledge and skill of the candidate requires significant judgment by an experienced, professional assessor. The excessive emphasis on what can be recorded on paper ‘results in a blinkered and inadequate understanding of the competencies actually and demonstrably held by the student, and significantly discounts the professionalism of the assessor’.
- The administration costs associated with audit ‘are killing the system. It costs the provider an excessive amount of money to meet a range of audit requirements, and to collect a mass of information, most of which has no obvious value-add to the quality of training’. There is also a concern that a very significant percentage of government training funds are diverted to supporting the ‘audit empire within the bureaucracy’ rather than delivering quality training experiences for vocational students.
- If auditors are to assist providers to conduct truly relevant and effective RPL, then ‘the auditors themselves need significant experience and knowledge—up-to-date knowledge—about effective teaching and learning’. Presently, we have too many auditors who ‘think that “good” training is what they experienced at school or college. Just as bad are the auditors who keep peddling the policy words but have no practical experience of making the ideas work’.
- A significant problem for students seeking to access RPL is literacy levels. Much of the marketing material, particularly from government agencies (including many technical and further education [TAFE] colleges), is so steeped in educational jargon that it ‘scares many high-performing workers away by making them feel inadequate’.
- If RPL is to be a learning tool, not just an administrative process, then ‘both those doing the assessing and those auditing the process need to have a good understanding of the nature of learning’.

Case study 6: ACNM Pty Ltd

ACNM Pty Ltd—trading as Australian College of Natural Medicine (Queensland and Western Australia) and Melbourne College of Natural Medicine (Victoria)—is a registered private provider of training in the areas of natural medicine and beauty. Nationally recognised and accredited courses are offered from certificate IV to advanced diploma levels at campuses in Queensland, Victoria and Western Australia. The college also offers degree courses that are accredited through the offices of higher education in Queensland and Victoria.

Students are informed about the availability of recognition of prior learning and the mechanisms for accessing it through a range of materials provided before and at enrolment. The procedures are detailed in student and staff handbooks, and in the college’s *Policies and procedures manual*. Students can apply for RPL on the basis of formal education and training, informal training (such as industry-based courses), work experience, and life experience (including family responsibilities, hobbies, community involvement and volunteer work). Students are given informal advice about the likelihood of success of an application prior to formal submission. A fee applies for the assessment which is less than one-third the cost of undertaking the equivalent program of study.

The candidates are required to complete an application form, submit an application with accompanying documentary evidence, and enrol as a student (to obtain a student identification number). Applications are reviewed by an RPL assessment panel, consisting of a dedicated assessor, a course expert (relating to the applicant’s chosen course of study), and if considered necessary, a person(s) with relevant industry and/or technical expertise. Applicants may be asked to attend an interview with the panel and/or demonstrate their proficiency if not completely obvious from the documentation. An appeals mechanism is in place for candidates who are unhappy with the decision of the assessment panel.

ACNM Pty Ltd has an internal policy of not granting more than 75% credit towards a degree qualification and 66% towards a VET qualification through recognition of prior learning. This is to provide sufficient time for the college to be sure that all graduating students attain the professional standards set by the college.

The head of teaching and learning at ACNM Pty Ltd made the following observations about the RPL process:

- Prospective and new students have little if any knowledge about RPL prior to coming to the college or accessing the ACNM Pty Ltd web site. As a consequence, there would seem to be a need for better marketing of the advantages of RPL at the 'system' level.
- There are difficulties in developing and maintaining appropriate RPL forms that satisfy the particular needs of the students, the college, and the auditors. Access to standardised forms would help overcome this area of frustration.
- The assessment of applications intrudes excessively into the professional time of academic staff at the college, particularly where candidates have extensive experience and supporting documentation.
- There is a lack of clarity and consequently significant confusion regarding how recognising the prior learning of students and the recognition of current competencies relate in the context of training packages.
- In some instances, the process has allowed ACNM Pty Ltd to identify people who can assist delivery by the college in areas other than the intended program of study. 'For example, one student applied for RPL towards a course in acupuncture, and was found to have a strong nursing background in areas of benefit to the college, and so was employed'.
- ACNM Pty Ltd is able to demonstrate consistency in recognition of prior learning decision-making to auditors because the college keeps a 'national precedents list' providing details on the amount of RPL previously provided under a range of circumstances.

Case study 7: JMC Academy

Founded in 1982 by John Martin Cass, JMC Academy is Australia's largest music and entertainment technology training provider, offering certificates, diplomas, advanced diplomas and degrees in association with the University of New England and the University of Sydney. The academy's specialised programs include audio engineering and sound production, digital animation, digital television production, music performance, and music business management. Located in Sydney and Melbourne and offering cutting edge courses in state-of-the-art training facilities, JMC Academy is committed to providing quality graduates for the music and entertainment technology industries. The academy has over 400 students at its Sydney Campus and over 300 students at its Melbourne campus. Examples of successful recording artists produced in its studios include Something For Kate, Even, Rail, Ali Moto, Little River Band and Nick Cave.

Students at the academy are given information about RPL at the time of enrolment, including an application form. RPL is not part of the general marketing for the academy, although the process is highly valued. There is no charge for the assessment of material presented for RPL at the academy. If a skills test is requested, either independently or at the suggestion of the academy, a nominal fee of $85.00 is charged to cover essential costs.

Until now, JMC Academy has been using accredited courses rather than training packages, although that situation is set to change. Most of the RPL requested and granted is focused on the first year of study, largely because school leavers already have many of the computing and communication skills contained in the first year of the training programs. There is little RPL for the second or subsequent years of study largely because of the dynamic nature of the industry meaning that students are addressing knowledge, skills and ideas they would not previously have been exposed to in any substantive way.

Senior staff of the JMC Academy made the following observations in relation to RPL:

- There are problems in providing direct credit from a training package into an accredited course, or vice versa. This is 'a particular problem where elements of competency, learning outcomes, etc., have the same or very similar names or descriptions, but do not mean the same thing in practice or application'.
- There are significant problems 'in a system requiring you to accept the assessments or qualifications from other providers when it is clear the standards of many of those providers are way below what you and indeed the industry generally consider acceptable'.
- Particularly in an area like music and entertainment technology, it is actually dysfunctional to the quality of training to have to focus on the audit requirement of documentation rather than the industry focus of professional judgment. Indeed, 'the time spent to provide the documentation is time lost to training—in other words, the current audit process is undermining the quality of the training'.
- Parents can pose a significant problem, particularly with young students 'fresh from school', by 'demanding high levels of RPL for their kids, even though the kids themselves want to do the training'.
- A particular difficulty for RPL is that the people who do the marketing and enrolments for training organisations do not always have accurate or comprehensive information 'about RPL and the concept of evidence'. This is a particular concern 'when evidence is simply promoted as providing a transcript'.

Case study 8: Captain Cook College of Hospitality Training[1]

Captain Cook College of Hospitality Training (not its real name) has been operating for almost ten years as a metropolitan-based private provider of training for the hospitality industry. The college facilities include its own 30-seat training restaurant and professional kitchen. Articulation arrangements have been established for college graduates with two Australian universities, as well as with some overseas hospitality training institutions.

The college offers accredited vocational training courses in hospitality management and operations at both certificate and diploma levels and services all levels of the hospitality industry, from 'fast food' operations to 'silver service'. It offers training in hotel and motel management, sales and marketing, convention management, café management, restaurant management, finance, human resource management, catering, and food and beverage preparation and service.

The Captain Cook College of Hospitality Training includes statements about the availability and benefits of RPL in its advertising literature. Furthermore, at the time of enrolment, every new student is advised of the process for seeking credit, and relevant forms and information sheets are made available. The key message promoted to students is that RPL can reduce the cost and time of their training programs.

The Captain Cook College of Hospitality Training does not charge students for assessment of portfolios for the purpose of RPL. A standard charge of $100.00 does apply if formal testing of claimed skills is negotiated as part of the process (usually in lieu of other formal evidence). The college places a standard 50% limit on the amount of credit that can be given towards a qualification by RPL, and any exceeding 50% of a qualification must be formally approved by the academic director. Recognition of prior learning at the college is generally managed by 'course coordinators'.

[1] The general manager of the college requested that the name of the college and any associated identifying information be kept confidential in the published report. Nevertheless, this case study report was forwarded to the general manager, who confirmed that the document accurately reflected the RPL processes and approach of the organisation, and her particular views on RPL.

The college has, in a sense, a sliding scale of the degree of rigour applied to assessments. If a candidate is only seeking a small amount of credit towards a qualification, the college makes the process 'relatively quick and easy' because it is argued that the appropriate standards will be ensured during the duration of the course. If the candidate is seeking a significant amount of RPL, the college applies 'considerable rigour to the process' because it is argued there may not be sufficient time for the college to ensure the appropriate industry standards can be met.

The academic director at Captain Cook College of Hospitality Training made the following observations regarding RPL:

- The amount of paperwork associated with assessments is 'a major turn-off for both the provider and the student, particularly when neither can see any particular benefits for their efforts'. The belief is that the paperwork is 'primarily a safety net for the auditors who have a fixation that quality is associated with the amount of information you record'. In turn, the paperwork is seen to 'generate most of the cost of the RPL process, which gets passed on to students, many of whom simply can't afford it'.
- The approach of auditors varies markedly from state to state. 'Generally, the auditors are reasonable people who are trying to help you. Only a few would actually qualify for the title "auditor from hell". They seem, however, to be locked into an accountancy rather than an educational paradigm by 'the system' that seems to believe the more control the greater the quality. Certainly, some states are much worse than others in this regard'.
- The college 'feels very uncomfortable about having to accept assessments and qualifications from other providers who we know simply aren't training students to acceptable industry standards'. The belief is that a provider should be able to 'reject direct credit transfer of competencies or elements of competencies where it is known appropriate standards have not been met'.
- The college has significant concerns about granting credit for formal learning or experience which occurred a significant time ago, particularly in industries experiencing rapid change such as information technology. Students may not be 'brought up to speed with the latest knowledge or standards for the industry' if such credit were granted.
- Much of the material used to market RPL, particularly from government agencies (including many TAFE colleges), is 'couched in educational jargon making it uninterpretable for many students, and does a good job of scaring many away'.

Issues and opportunities: Findings from the case studies

This section presents the ten overriding issues that, on reflection, appear to the researcher to lie across the information and suggestions made by the trainers, assessors and managers interviewed for this study. To some extent, comments made in this section also will inevitably reflect information derived by the researcher from the non-verbal communication during the interviews—body language, voice tone and nuances, and facial expressions.

It is not possible to generalise from just eight case studies of private training organisations that are themselves quite diverse in terms of location, industry focus and market niche. Nevertheless, the consistency and clarity with which the issues were raised across the eight organisations suggest that they are worthy of further research, debate and consideration for their possible contribution to policy and practice at both system and local levels.

The RPL process and supporting information need to be clear, concise and jargon free.

There appears to be strong evidence that complexity, as well as the appearance of complexity, are major disincentives for students seeking RPL. It is often a daunting step for people to seek to improve their qualifications by enrolling in a program of training, and this trepidation is likely to be amplified if they are confronted by a complex and time-consuming process expressed in training jargon. It is the clear perception of the people interviewed for this study that such jargon (which they frequently referred to as 'academic dialogue') and complexity are currently defining characteristics of the 'RPL regime'. It is also the clear perception of the people interviewed that the complexity and jargon are not necessary. As one provider stated: 'All it takes is for the person responsible for the RPL process to step out of the role of administrator, and put themselves in the role of the candidate'.

The jargon and complexity, however, are also seen to be evident in the processes, procedures and documentation provided by 'the system' to providers. It is unlikely many providers will be motivated to promote and implement RPL as a valued process for students if they themselves must interpret complex, often imprecise and jargon-riddled policies and documentation. Furthermore, it is the considered view of the providers interviewed for this study that the consistency of implementation of RPL 'across the system' would 'improve dramatically if policies, processes and accompanying information were reviewed to ensure they are clear, concise and jargon free'.

The administrative costs associated with RPL are seen to be a significant disincentive for both candidates and providers, and may be exacerbating equity concerns regarding access of disadvantaged persons.

Reportedly much, if not most, of the administrative burden and subsequent costs imposed on providers, and in turn on students, comes from 'the onerous, excessive and pedantic paper-based recording needed to be completed by providers in order to meet the requirements, or at least perceived requirements, of audit, or more precisely, particular auditors'. The antipathy of the providers towards the volume and impact of these administrative demands cannot be overstated. It is suggested by the researcher, however, that the issue does not appear to be the amount of paperwork *per se* (all those interviewed readily acknowledged the need for quality assurance checks), but rather the significant amount of that paperwork which does not appear to the providers to contribute in any obvious way to the quality of the training they provide, or to the quality of the training at a system level. Many providers believe the 'good' providers are being penalised in order

'to keep a check on the quality of the poorer providers', and there is a pervasive cynicism that much of the data is collected for reporting requirements of governments, the cost and effort of which they believe should be worn by the bureaucracy.

There is also a significant concern among some of the providers interviewed, supported to some extent by data they have collected, that the cost of RPL has the greatest impact on many of the disadvantaged people whose access to training RPL is supposedly assisting. This study was not able to pursue this allegation with any rigour, but there would appear to be sufficient logic in the allegations to suggest further research is warranted. Certainly, if the allegations are substantiated, it is an issue needing urgent consideration by those developing and implementing training policy.

The focus of audit with respect to assessment for RPL is seen to be inappropriate and to devalue 'professional judgment', which is considered the most powerful assessment process for RPL purposes.

The general opinion of those interviewed for this study is that the major focus for the assessment of RPL candidates should be on the capacity to perform 'the task' in the workplace to industry standards. It is argued that most candidates for RPL are already operating in the workplace, and are seeking formal confirmation of their performance. The contention is that the most valid and effective way of confirming a candidate's capacity to perform tasks in the workplace to the standards required by industry generally is by the professional judgment of qualified assessors who also have strong industry credibility. As a consequence, it is argued that the focus of audit should be on confirming the capacity of the assessors to make credible industry-supported judgments. It is further argued by those interviewed for this study that it can reasonably be inferred that if a candidate can perform 'the task' in the workplace to industry standards, then that candidate must possess the elements of competency—implicitly if not explicitly—that underpin that task, and so it is an unnecessary burden on both the candidate and the training organisation to be expected to comprehensively test those elements of competency.

It is the strong and pervasive opinion of those interviewed for this study that the audit process explicitly devalues professional judgment by highly qualified assessors by generally demanding comprehensive, detailed presentation of evidence concerning elements of competency and generally rejecting subjective, holistic observations made of the performance of workplace tasks. The providers expressed 'considerable concern at the clear assumption made by auditors that comprehensive institution-based testing is the only defensible assessment of claims of workplace competence made for the purposes of RPL'. The pervasive belief is that audit is attempting to provide 'quality control for assessors who do not have the professional competence to make valid professional judgments', and in so doing, is actually 'undermining the capacity of good providers to conduct RPL in a highly valid and cost-effective way'. In simple terms, the constrictions applied by audit are seen to be a major reason for many private providers choosing not to promote RPL as a major component of the training agenda.

There is a considerable concern about the 'shelf-life' of qualifications and experience used for the purpose of RPL, particularly in some industry areas.

The concern expressed by those interviewed for this study is that the rate, pervasiveness and depth of change in some industry areas is such that even quite recently acquired qualifications and experience may no longer reflect accepted industry practice or standards. JMC Academy, for example, noted that sound and video technology is changing so rapidly that knowledge and skills gained just a couple of years ago may in some areas already be totally obsolete. This creates significant problems for providers when a candidate presents evidence of successfully completed study—if credit is granted, the candidate may not actually have knowledge of, or skills in, important aspects of the industry, but if credit is refused, the candidate may consider the provider inflexible and take their application elsewhere. The interviews conducted for this study suggest that this may become a particular problem for students undertaking VET in Schools, where knowledge and skills can be two or three years old at the time they exit schooling and seek further training.

There is a considerable concern about the significant and obvious difference in standards among training providers when the national training agenda mandates the acceptance of assessments by all other registered training providers.

Several of the providers interviewed for this study expressed considerable concern at having to grant credit for prior learning because a student had been assessed as competent (for a qualification, competency, or elements of competency) by another provider when it is obvious the student does not have the relevant knowledge and skills to the standards required by the industry. This is not seen to be a major concern when the candidate is only seeking RPL for a small percentage of a training program because the providers generally believe they can 'compensate for deficiencies before graduation'. It is, however, seen to be a major problem when the candidate is seeking a significant amount of recognition towards a qualification which will carry the name of the new provider.

There is a concern about the increasing difficulty RPL candidates will have validating experience as businesses move to electronic record keeping.

Several providers presented anecdotes about staff who had never thought to keep validated records of their experience because, at the time, the idea of undertaking a qualification, let alone providing evidence for prior learning, was not a consideration. Many businesses do not keep detailed records of staff participation in a range of professional activities. Furthermore, as businesses move to electronic record-keeping, paper files of all but the essential industrial relations and workplace conditions information are frequently discarded. This leaves candidates in the position of not being able to formally validate relevant experience, and assessors in the position of having to make a 'risk-assessment on gut feel' that they know will make them vulnerable with auditors.

RPL can be a powerful process to assist student career planning.

Several of the providers interviewed spoke of the assistance RPL can provide in helping candidates understand where their strengths, weaknesses and interests lie, particularly if the process has included direct interaction with workplace supervisors and mentors. This can help them map not only appropriate careers, but also appropriate pathways for attaining their goals.

RPL can have a significant impact on learner confidence and motivation.

Several of the providers interviewed spoke of the significant confidence boost candidates can experience when, through the recognition process, they come to realise how much they already know and can do. This can often motivate them to try, with enthusiasm, a qualification or training program they otherwise might not have attempted, or at least would have approached with trepidation. Confidence is identified in the literature as a key element in motivating adult learners to achieve success in any learning program (Keller 1998).

RPL can assist significantly the development of learner-centred training programs.

The assertion is that the process provides important information about what the candidate knows and can do in a form that can be of immense assistance to trainers. First, it is seen to be important that learners are not compelled to revisit knowledge and skills they already have. Second, it is argued that understanding the knowledge and skill base of each learner allows the trainer to build on those experiences in ways highly supportive to learning and the achievement of outcomes. Furthermore, it is argued by many of those interviewed that an effective RPL interview, particularly if conducted in the workplace, can provide significant insights into how each candidate learns best, which allows trainers to tailor the teaching-learning process to match learning styles.

RPL can provide significant assistance to employers regarding the potential contribution of the candidate to the business.

Many of the providers interviewed make every attempt to ensure at least direct supervisors and employers, wherever possible, participate in the RPL process. This is seen as a very effective way of assisting senior staff of the business to understand the existing knowledge, skill and experience of the candidate (their employee) so that, in turn, the business can make maximum productive use of

the employee. Not only does this have a potentially significant value-add for the business, but also it is seen by the training provider as helping cement a long-term business partnership. A further benefit suggested is potentially increased commitment and loyalty from the RPL candidate to the business as a consequence of the overt advocacy provided by supervisors and employers for the candidate in the process.

The major inhibitors of the effective implementation of RPL identified in the case studies are generally compatible with those identified in the literature review earlier in this report, namely: policy and procedural ambiguity and complexity; the impact of audit processes and requirements, real or perceived; excessive administration requirements, particularly with respect to paperwork; and concerns about validity, reliability, equivalence and quality assurance in general.

The case studies, however, generally present a much more positive view of RPL than generally has been identified in the literature. The literature has identified few factors that actually promote effective RPL, generally asserting that policy and practice in Australia primarily appears to be running on the principle that RPL itself is its own promoter of participation. The case studies, on the other hand, suggest there is a range of educational factors that can be very powerful promoters of RPL from the perspective of trainers, students and business. They also suggest that RPL, informally if not formally, may be a much more pervasive characteristic of the training system than is suggested by the literature.

Conclusion: The key themes

On reflection, four major themes appear to underpin the information and insights gained from the set of case studies presented in this report:

- ✧ There are significant advantages of RPL that lie in the potential use by students, trainers and employers of the information gained through the process itself, not just in the advanced standing it may provide towards a qualification or program of study.
- ✧ Effective RPL requires experienced professional assessors able to make informed professional judgments.
- ✧ The current high administrative costs of RPL and the subsequent cost impost on candidates may be operating to decrease the relative access of candidates from disadvantaged groups.
- ✧ The major dysfunctions associated with the RPL process, and the major reasons underpinning a reluctance among private providers to promote it as an important adjunct to training pathways, may be significantly and causally linked to the 'delivered' focus of audit in the context of RPL assessments, and the associated nature and level of reporting required, or at least believed to be required, of providers by many auditors. In simple terms, there is a perception that it is not worth the effort to promote RPL because of the amount of paperwork needing to be completed to fulfil the requirements of the auditors.

The last two themes in particular would seem worthy of further research and analysis in the context of training policy development and implementation. The social justice issue raised in the third theme has an intuitive logic suggesting it may well be an unintended consequence of the RPL process. Nevertheless, research is needed to confirm whether the issue has broad impact across the training system, and also to provide a better understanding of the nature of the problem and of cost-effective options for its resolution.

The fourth theme—the focus and impact of audit as it is applied for the purposes of RPL—would seem to be an area of major significance for training policy, particularly if, as is claimed by the organisations involved in this study, it is having a marked negative impact both in terms of increasing access to training pathways and promoting educational quality.

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