

*Adult, Community and Further Education (ACFE) Board*

Submission to the Essential Services Commission

**Vocational Education and Training Fee and  
Funding Review Issues Paper**

*June 2011*

## Introduction

The Adult, Community and Further Education (ACFE) Board is a statutory authority established under the *Education and Training Reform Act 2006*. The ACFE Board's statutory roles include planning for and promoting adult learning, allocating resources, developing policies and advising the Minister for Higher Education and Skills on matters relating to ACFE. The ACFE Board requires all Victorian adult community education providers it supports to be registered with the Board.

Through the ACFE Board, the Victorian Government provides funding to approximately 320 Adult Community Education (ACE) providers and two Adult Education Institutions for delivery of education and training programs to people over school-leaving age.

In 2010, nearly all ACE providers (98 per cent) offered pre-accredited training<sup>a</sup>, nearly half (49 per cent) offered training in accredited courses<sup>b</sup> and a small number (9 per cent) offered apprentice-traineeship programs.

This submission is made by the ACFE Board in response to the Essential Services Commission Vocational Education and Training (VET) Fee and Funding Review Issues Paper, with an emphasis on VET fee and funding as it relates to ACE providers in a mixed market model which includes purchased support and demand driven accredited training.

## Significance of the Adult, Community and Further Education sector

ACE providers in Victoria are community owned and managed and operate on a not-for-profit basis with a focus on the local community. A key strength of ACE environments is the flexibility to tailor activities to meet the individual needs of learners.<sup>1</sup> ACE particularly appeals to learners who have had limited access to prior education, have experienced disadvantage or whose needs may not be met by more formal educational institutions.<sup>2</sup> In 2010, 38 per cent of ACE learners were living in low socio-economic status localities, 25 per cent were unemployed and 19 per cent were from culturally and linguistically diverse backgrounds. A total of 20 per cent of ACE learners in 2010 had multiple sources of disadvantage<sup>3</sup>, with 81 per cent from at least one of nine identified hard to reach learner groups<sup>c</sup>.

ACE providers generally receive funding from local, State and Commonwealth governments and various private sources, for the delivery of mixed services of which education must be one primary focus. Nearly half of the ACE providers contracted by the ACFE Board in 2010 were Registered Training Organisations (RTOs).

The importance of the ACE sector has been highlighted at a national level, with recognition that the sector makes a significant contribution to the engagement of disadvantaged learners and

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<sup>a</sup> Pre-accredited training refers to government funded courses purchased by the ACFE Board that lie outside the formal VET system and are designed for learners to gain confidence and skills, particularly in language, literacy and numeracy and employability skills.

<sup>b</sup> Accredited training provides learners with competencies or full qualifications that are nationally recognised under the Australian Qualifications Framework, and transferable.

<sup>c</sup> Hard to reach learner groups tracked by the ACFE Board include: culturally and linguistically diverse, those with a disability, disengaged youth, early school leavers, Indigenous learners, those living in low socio-economic localities; males aged 45 and over, unemployed learners and vulnerable low skill workers.

<sup>1</sup> Allen Consulting Group, *The Economic Benefit of Investment in Adult Community Education in Victoria*, report to the Department of Planning and Community Development and the Adult, Community and Further Education (ACFE) Board, Allen Consulting Group, Melbourne 2008, p 22.

<sup>2</sup> *Ibid*, p 4.

<sup>3</sup> Department of Education and Early Childhood Development (DEECD), *ACFE Data pack 1*, May 2011.

provides pathways to further learning, community participation and work.<sup>4</sup> It is recognised that ACE providers contribute to economic development through improving workforce skills and participation rates.<sup>5</sup> ACE providers also contribute to community development in a variety of ways, including improving mental, physical and emotional wellbeing, contributing to social cohesion and facilitating local networks.<sup>6</sup> The Organisation for Economic Cooperation and Development has recently published a paper which recognises the benefits of non-formal learning and recommends that non-formal and informal learning outcomes which lead to further study or employment be appropriately recognised in policy frameworks.<sup>7</sup>

There is evidence that ACE providers contribute to positive outcomes, with 83 per cent of learners in 2010 indicating that they were achieving their study goals.<sup>8</sup> Research into outcomes for ACE learners shows that among unemployed ACE learners, 68 per cent reported that their study had taught them skills to get them a job and 58 per cent had obtained a job. Among employed learners, 73 per cent reported that their study helped with work tasks, 61 per cent reported that study taught them skills to help get them a better job, 47 per cent reported that it helped them get a new job and 26 per cent said that their study helped them to set up or run a business.<sup>9</sup>

Over recent years, the ACFE Board has commissioned significant research into the ACE sector, in areas including the economic benefit of investment in the ACE sector, retention of hard to reach learners, and pedagogies for life and employability, which further emphasises the value of ACE.

Under the new skills system, ACE providers face new opportunities and challenges in responding to and or competing with market demand, managing new learner eligibility requirements, attracting new learners into higher qualifications and contesting for funding.<sup>10</sup> As a result of the recent reforms, the ACE sector is now operating within a mixed market model which includes purchased pre-accredited training and demand driven accredited training.

In response to the principles for the review outlined at section 2.3 of the Essential Services Commission issues paper, the ACFE Board suggests that the following additional principles be added to the terms of the review in examining the efficiency and effectiveness of the current fee and funding arrangements and in assessing any alternative models:

Access and Equity – the arrangements for funding and fees should increase access and participation and lead to equitable outcomes for all learners.

Measurability – the impacts of the new arrangements, including the impact on the number of learners from high needs cohorts must be able to be measured.

<sup>4</sup> Skills Australia, *Skills for Prosperity: a roadmap for vocational education and training*, Commonwealth of Australia 2011.

<sup>5</sup> Allen Consulting Group, *op.cit.*

<sup>6</sup> *Ibid.*

<sup>7</sup> Organisation for Economic Co-operation and Development, *Recognition of non-formal and informal learning pointers for policy development*, March 2010.

<sup>8</sup> DEECD, *op.cit.*

<sup>9</sup> Centre for Post-compulsory Education and Lifelong Learning, *ACE Longitudinal Study – Final Report – Stage 3*, report to the Adult Community and Further Education Board, University of Melbourne 2006.

<sup>10</sup> Adult, Community and Further Education (ACFE) Board, *The Changing Face of Community Business – ACE Providers Business Survey*, ACFE Board, Melbourne 2011.

## Pathways for learners

Over 65,500 ACE learners were enrolled in accredited and pre-accredited VET courses during 2010. Another 34,000 were enrolled in non-VET enrichment programs taking the total number of people who participated in ACE programs during 2010 to almost 100,000.<sup>11</sup>

One of the key features that shapes the ACE sector and distinguishes it from the rest of the VET sector in Victoria is the delivery of pre-accredited training. Another distinguishing feature is the delivery of community learning projects that focus on the skills development of whole groups in the community rather than individual learning. The ACE sector includes many non-RTOs and is a significant support for the early engagement of disengaged or disadvantaged learners in local community settings through both these forms of engagement, including in rural and regional Victoria.

Pre-accredited training lies outside the formal VET recognition system and is designed for learners to gain confidence and initial vocational skills through short programs of study of at least 20 hours duration. The courses must have vocational intent to be government funded. Many learners move on to nationally accredited programs or to paid or unpaid employment. This early engagement re-establishes a link with learning for these individuals. Research has shown that developing motivation for learning and overcoming gaps in language, literacy and other foundation skills are important for educational, labour market and social participation.<sup>12</sup> Research has also shown that supporting early engagement of these learners results in significant savings elsewhere in government expenditure.<sup>13</sup>

In the 2010 ACE Providers Business Survey, respondents from non-RTOs raised ongoing concerns about impacts on the demand for, and funding of, pre-accredited training and skills reform.<sup>14</sup> In regions where this funding has not met demand, subsequent participation by early school leavers (those who completed high school during Year 10 or 11) and learners who live in low socio-economic status localities has declined in local settings, suggesting that these groups may be at greater risk if local initial pathways are unavailable.<sup>15</sup>

In recognition of the ACE sector's unique role in supporting early engagement with the education and training system, including through many non-RTOs, the ACFE Board supports a larger, separate and ongoing funding stream to the sector to deliver pre-accredited vocational pathways leading to qualifications, as well as the provision of funds to support community engagement projects and wellness skills development for the disabled and non-working population. Pre-accredited training is currently funded at just below \$10 million per annum, community learning at \$1 million per annum, and there are no funds to support wellness skills activities.

An additional distinguishing feature of the ACE sector relative to other education sectors is its community focus, with extensive involvement of volunteers<sup>16</sup> and lower paid staff compared with private RTOs and TAFEs. In order to deliver quality pathways to higher needs learners, funding support from government is required on an ongoing basis to develop the business and education skills of the not for profit sector to ensure that staff are equipped to deliver effective

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<sup>11</sup> DEECD, *op.cit.*

<sup>12</sup> NSW Department of Education, *Framework for the Development of an ACE social inclusion strategy – Final Report*, January 2005.

<sup>13</sup> Allen Consulting Group, *op. cit.* p 36.

<sup>14</sup> ACFE Board, *op.cit.* It is estimated that 50 per cent of the Ace workforce is comprised of

<sup>15</sup> DEECD, *op.cit.*

<sup>16</sup> Allen Consulting Group, *op.cit.*, p 19.

learner pathways in local settings. Once-off four year funding for this purpose of around \$11 million is currently due to expire mid 2012.

## **Funding arrangements**

As noted in Section 5 of the ESC Issues paper, the current basis for VET funding is through the Student Contact Hour Model. Under this model, the base hourly funding rate varies depending on the level of course provided, and there is a higher rate for TAFE providers than other RTOs, justified by some on the basis that TAFE delivers public good outcomes.

The ACFE Board considers that the ACE sector, in delivering to a broad cohort of learners in a range of high need industry areas (in particular, literacy and numeracy, and aged care and childcare), and by providing an efficient market mechanism for responding to demand, also provides a range of public good outcomes. Research suggests that ACE creates individual and community outcomes and contributes to the economic and social sustainability of Victoria.<sup>17</sup> Outcomes for vocationally oriented ACE programs include organisations having greater access to skilled employees, and in the case of individuals moving out of unemployment, there is a public benefit in moving from receiving social benefit payments to contributing to the taxation system.<sup>18</sup> Non-market benefits are also considered to be substantial in estimating the value of ACE in Victoria, including public benefits such as increased social capital.<sup>19</sup>

The ACFE Board supports ACE RTOs competing to deliver accredited training to learners in a demand driven market, provided that it is on the same basis as other providers (this requires, for example, that fee concession Diploma places for eligible youth not be available solely at TAFE).

The funding and fees provided through the Victorian Government must be adequate to enable higher needs learners, those with low or redundant skills or those who have been out of the workforce for 12 months or more, to receive quality education which re-establishes them on the path to economic and/or social participation.

Consistent with the ACFE Board's support for a level playing field for all providers, the ACFE Board considers that there should be a single base funding rate for providers who deliver public good outcomes. This should include ACE providers including the Adult Education Institutions, CAE and AMES.

## **Supporting higher needs learners**

Higher needs learners are significantly represented in VET settings including ACE. In 2010 ACE made up 11 per cent of the Victorian VET sector but provided training to a disproportionate share of learners in disadvantaged social, educational and employment circumstances relative to its market share.<sup>20</sup> For example, in 2010, ACE provided training to 17 per cent of all unemployed VET learners. Further detail on hard to reach population participation rates and relative participation rates within the VET sector is at [Appendix A](#).

ACE providers support positive engagement with hard-to-reach learners through their flexibility and innovation in the provision of courses to meet the needs of learners in a non-threatening

<sup>17</sup> Centre for Post-compulsory Education and Lifelong Learning, *op.cit.*

<sup>18</sup> Allen Consulting Group, *op.cit.*, p 10.

<sup>19</sup> *Ibid.*, p 42.

<sup>20</sup> DEECD, *op.cit.*

environment.<sup>21</sup> These higher needs learners require additional mechanisms to support learning, the assessment of skills, ongoing attendance and pathways to further study and employment. Additional resourcing would give due recognition to the time and importance of attaining foundation skills through both pre-accredited and accredited pathways as a first step towards re-engaging with the education and training system.

There are current VET funding weightings only for youth and Indigenous. The weightings ignore many higher needs learner groups and do not reflect the relative costs of delivering tailored training to learners experiencing barriers to workforce and social participation. They also do not allow for differences in the level of disadvantage and support required. The need for different levels of support and the costs associated with providing services to disadvantaged groups has been recognised in funding models outside of the education and training sector, such as in the NSW health system.<sup>22</sup>

In addition to supporting individual higher needs learners to access and succeed in education and training, recognition of the diverse challenges in addressing the needs of these groups is likely to encourage education providers to engage with vulnerable and hard to reach learners. For example, the average cost of service provision per supported student with a disability studying at the Centre for Adult Education was \$1,089 in 2010.<sup>23</sup> A similar amount [\$1,030 per youth studying VCAL in an ACE setting] was provided by the Department of Education and Early Childhood Development in 2011 in recognition of the co-ordination costs associated with these students, who generally have higher needs. Poor and sporadic attendance by learners in higher needs groups impacts on entitlements and provider payment, which in turn impacts on provider commitment to working with this cohort under the demand model. By engaging these learners, ACE providers contribute significant social and economic benefits to the communities in which they operate.<sup>24</sup>

The ACFE Board considers that the current weightings for youth and Indigenous should be replaced with additional fee support in the form of a participation incentive to support the engagement of high needs learners, with three levels of support available from low to high depending on the level of disadvantage and support required. Those learners experiencing barriers to workforce and social participation due to low skill levels, redundancy and/or non-recognition of skills generally require additional support.

The higher needs learner groups defined in recent recommendations to Ministers by the National VET Equity Advisory Council could be the basis for the additional support. The identified groups comprise: Indigenous Australians; people from socio-economically disadvantaged backgrounds; people from culturally and linguistically diverse backgrounds particularly new arrivals to Australia, refugees and emerging communities; people with a disability; people from rural, regional or remote locations or communities with high levels of disadvantage; people with less than Year 12 or equivalent level of educational attainment; those returning to learning after a long period of absence from study and/or work; reskilling following redundancy; people of working age who are neither working nor studying; or those involved in the criminal justice system.

NVEAC also refers to the need to monitor differences of age and gender. ACFE's current research notes that relative to population share youth and men over 45 are at risk in the

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<sup>21</sup> Adult, Community and Further Education (ACFE) Board, *Hard to reach learners: what works in reaching and keeping them?* ACFE Board, Melbourne, 2010, p 49.

<sup>22</sup> Department of Health, *NSW Health's funding approach – equity and efficiency*, 2005.

<sup>23</sup> Data sourced directly from Centre for Adult Education.

<sup>24</sup> Allen Consulting Group, *op.cit*, p 4.

Victorian labour market, with low skilled and unemployed men over 45 a particular target for re-engagement through ACE settings.

### Locational thin markets

The ability to provide a consistent focus at the local community level is a unique component of the ACE sector's social and economic contribution.<sup>25</sup> The broad geographic spread of ACE providers enables accessible learning opportunities for a large number of Victorians, particularly those in regional areas.<sup>26</sup> While ACE makes up 11 per cent of the Victorian VET sector, this figure rises to 16 per cent in rural Victoria, which further emphasises the importance of ACE in these communities.<sup>27</sup>

There are a number of challenges that face education providers in rural areas, such as access to resources, a smaller pool of suitable trainers and a lower target learner population. Young people living in rural and remote locations are almost 50 per cent less likely to hold either a higher VET qualification or university degree than those in other areas.<sup>28</sup> ACE is often the only place people can go for adult learning in rural areas.<sup>29</sup> In 2010, 43 per cent of ACE learners were from regional areas.<sup>30</sup>

ACE providers in rural areas have indicated that it is difficult to find trainers with the right qualifications.<sup>31</sup> An additional challenge for rural providers is attracting learners in order to create viable class sizes. A total of 68 ACE providers in rural Victoria are delivering to less than 50 students.<sup>32</sup>

The Commission has identified the issue of thin markets where there are insufficient learners to justify an economic case for the establishment of learning programmes. The principle of equity suggests that despite their location, these learners should be provided with equal access to learning opportunities.

The ACFE Board supports the introduction of a rural weighting to address the disadvantage and additional costs of delivery for all VET providers in these locational thin markets.

### Eligibility arrangements

The ACFE Board considers that the current eligibility arrangements are not helping all Victorians who need support to access VET. The exemptions provisions mix industry and equity issues, and generally have been insufficient in ACE settings to respond to both (typically one exemption per ACE RTO is currently available).

The current eligibility arrangements fail to address the impact of qualification redundancy caused by industry downsizing or significant changes in employment requirements due to economic and industry restructuring, for example, the manufacturing sector in the Latrobe Valley. As discussed earlier, the ACFE Board recommends addressing re-skilling learners in

<sup>25</sup> *Ibid*, p 1.

<sup>26</sup> *Ibid*, p vii.

<sup>27</sup> DEECD, *op.cit.*

<sup>28</sup> ACFE Board 2010, *op.cit.*, p 14.

<sup>29</sup> Centre for Post-compulsory Education and Lifelong Learning, *op.cit.*

<sup>30</sup> DEECD, *op.cit.*

<sup>31</sup> ACFE Board 2011, *op. cit.* p 18.

<sup>32</sup> DEECD, *op.cit.*

such circumstances through new higher needs learner support arrangements. This would need to be accompanied by changed eligibility requirements in industries facing structural adjustment to enable re-skilling at level or below for those workers who find that preferable or necessary.

Data from ACE providers confirms that criteria under the Victorian Training Guarantee (VTG) are restricting participation by some equity groups. One ACE provider noted that their target audience has decreased due to eligibility criteria. Another provider commented that the eligibility criteria had excluded many of their previous participants who are unable to pay for an unsubsidised place in a course.<sup>33</sup>

There are cases of particular personal circumstances making learners ineligible for a government subsidised training place due to the up-skilling criterion. For example, a student who has completed a Certificate III in Volunteering is ineligible to undertake a government-subsidised course at the same level in Aged Care. Placing a qualification such as Volunteering into Foundation Skills would remove a barrier and enable learners to build and support employability skills without being a barrier to further skills development related to paid employment.

As another example, an individual who has suffered an injury or illness may not be able to use their current higher level qualifications for work. The impact of acquired brain injury on skills utilisation is one such circumstance. An individual who has had restrictions placed on them as a result of interaction with the justice system (for example, loss of a drivers licence) may also require retraining.

In addition to these factors, the concessions and tuition fee structure is further heightening disadvantage for some learners and is having a negative influence on student and provider decisions about course enrolments and course offerings.

The ACFE Board's position is that the current limited and capped exemption arrangements do not adequately cater for the full range of circumstances that may necessitate re-skilling, and as such suggests that exemptions should be abolished as a method of dealing with re-skilling. The ACFE Board recommends separate methods for dealing with industry and equity needs.

In addressing industry needs, the Board suggests that existing eligibility requirements should be revised so that higher level qualifications which no longer have industry recognition for any licensed occupation, or where the qualification is not likely to lead to work in the region, are not taken into account in determining eligibility.

In addition, there should be agreement sought for the Commonwealth Industry Fund allocations in Victoria to be prioritised to industry re-skilling, as well as to skill unemployed people in local areas to meet industry skill/growth requirements, without prior qualifications being a consideration. This would avoid overlap and duplication of Commonwealth and State funds.

In addressing equity needs, the Board suggests that the \$40 million in funds previously set aside for exemptions be provided to the VSC/ACFE Board Access and Equity Committee to support greater equity group participation across the entire VET system by provision of approximately 4,000 – 5,000 full and partial VET learner equity scholarships which are not covered by the VTG conditions. This would provide funds for equity scholarships for around 1.5 per cent of government supported VET learners.

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<sup>33</sup> ACFE Board 2011, *op. cit.*, p 8.

## Foundation category courses and the Victorian Training Guarantee

In the ACFE Board's view, the current Foundation category courses are not delivering fully on the VTG aim to provide students with low levels of literacy, numeracy and language skills to effective and unlimited support.

Evidence from ACE providers suggests that the full range of employability skills to support study at higher levels is lacking in the current Foundation Skills category.<sup>34</sup> One rural provider noted the absence of information technology qualifications to prepare students for higher level study. Other providers advocate that their Volunteering courses should be considered Foundation Skills to be supported by government. One way of addressing the issue of insufficient access to employability skills would be to extend the range of courses within the Foundation category to include basic IT and business courses.

There is also evidence that the cap on nominal hours within Foundation category courses is not supporting objective skills attainment. Evidence from ACE providers<sup>35</sup> suggests that the current nominal hours for Foundation courses is insufficient, particularly in basic literacy, numeracy and English as a Second Language courses where there may be significant barriers to learning that require a longer period of time within which to attain the necessary skills. There is also evidence that some courses may be inadequately structured for the volume of learning required by very disadvantaged learners, which could be addressed through more integrated course activity tailored to individual learner needs.

The Module Load Completion Rate<sup>d</sup> for adult education literacy and language programs in ACE settings is very low compared to results in the other industry areas delivered by ACE. In 2010, learners in adult education recorded the lowest MLCR of 46 per cent, with the very lowest completion rates in courses such as the Certificate in General Education for Adults and Certificate in Spoken and Written English.<sup>36</sup> These low completion rates may highlight the level of learning disadvantage to be overcome by these learners.

The ACFE Board suggests that entitlement in the Foundation category should be based on integrated course activity to meet learner needs. This could be achieved by revising the cap to 1000 hours and extending the range of Foundation category qualifications to include Information Technology, entry level Business courses and Volunteering.

## Payment arrangements

The current in arrears payments, which replace the prior ACFE even monthly up front payment across the course of a year to any provider contracted, are acting as a disincentive for not for profit ACE RTOs with limited cash flows to participate in the VTG. Payments based on monthly fluctuations in participation do not match most ACE providers' expenditure patterns.

For example, YNH Services in Yarrawonga has indicated that the changed funding model has had a significant effect on its cash flow. As a provider offering a large proportion of courses in Aged Care and Childcare which involve practical placements as part of the assessment process, there is a significant initial outlay for the provider before receiving payments which are spread over the length of the course. YNH Services has taken out an overdraft as part of its risk management strategy.

<sup>34</sup> Anecdotal evidence from ACE providers gathered by ACFE.

<sup>35</sup> *Ibid.*

<sup>d</sup> MLCR – ratio of completed student contact hours within assessable modules

<sup>36</sup> DEECD, op.cit.

Another ACE RTO, Narre Community Learning Centre, which has a total turnover of just under \$2 million per annum, has for the first time taken out a bank overdraft of \$150,000 to cover fixed expenditure in the period November to March when its training delivery is lowest. The Small Business Monitoring Service and ACE peak bodies have confirmed that a number of providers have had to extend credit arrangements in order to meet their up front cash requirements since the advent of skills reform.<sup>37</sup>

Payment arrangements and associated compliance are also contributing to a lack of diversity of choice of provider type in the Victorian Training System. Since July 2009, over 40 ACE providers have either given up their RTO status or chosen not to register with Skills Victoria to deliver the Victorian Training Guarantee. As part of the 2010 ACE Providers Business Survey, 32 per cent of RTO respondents indicated that there had not been opportunities so far under the new skills system. Issues or reasons why providers were unable to capitalise on potential opportunities included a lack of upfront resources.<sup>38</sup>

The ACFE Board suggests advance payment to all RTOs in January based on a percentage of the previous year's delivery pattern. Advance payment could then be deducted from actual delivery for July to December until reconciled. This would provide a better incentive than currently for ACE RTOs to participate more fully in the VTG, by guaranteeing a better cash flow while still requiring actual delivery to receive payment.

## **Conclusion**

The ACE sector plays an important role in the delivery of VET in Victoria. Recognition of the unique aspects of the ACE sector in providing both accredited and pre-accredited VET pathways is vital to ensure that the most disadvantaged learners have opportunities to access and participate fully in the Victorian training system.

The ACFE Board considers that any changes to fee and funding arrangements in the VET sector should ensure that the system supports positive and high quality outcomes for all learners.

The ACFE Board notes that the Department of Education and Early Childhood Development will appoint an expert individual or panel to seek feedback on the Commission's final report and recommends that ACFE is represented should a panel be established.

The ACFE Board would be happy to elaborate further on any parts of the submission.

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<sup>37</sup> Anecdotal evidence gathered by ACFE.

<sup>38</sup> ACFE Board 2011, *op. cit.*

## References:

Adult, Community and Further Education (ACFE) Board, *Hard to reach learners: what works in reaching and keeping them?* ACFE Board, Melbourne, 2010.

Adult, Community and Further Education (ACFE) Board, *The Changing Face of Community Business – ACE Providers Business Survey*, ACFE Board, Melbourne 2011.

Allen Consulting Group, *The Economic Benefit of Investment in Adult Community Education in Victoria*, report to the Department of Planning and Community Development and the Adult, Community and Further Education (ACFE) Board, Allen Consulting Group, Melbourne 2008.

Centre for Post-compulsory Education and Lifelong Learning, *ACE Longitudinal Study – Final Report – Stage 3*, report to the Adult Community and Further Education Board, University of Melbourne 2006.

Department of Education and Early Childhood Development (DEECD), *ACFE Data pack 1*, May 2011.

Department of Health, *NSW Health's funding approach – equity and efficiency*, 2005.

Essential Services Commission, *Vocational Education and Training Fee and Funding Review Issues Paper*, May 2011.

National VET Equity Advisory Council (NVEAC), *Equity Blueprint 2011-2016 Creating Futures: Achieving Potential through VET*, February 2011.

NSW Department of Education, *Framework for the Development of an ACE social inclusion strategy* – Final Report, January 2005.

Organisation for Economic Co-operation and Development, *Recognition of non-formal and informal learning pointers for policy development*, March 2010.

Skills Australia, *Skills for Prosperity: a roadmap for vocational education and training*, Commonwealth of Australia 2011.

**Appendix A**

**Figure 1 Hard to reach population participation rates : 2010**

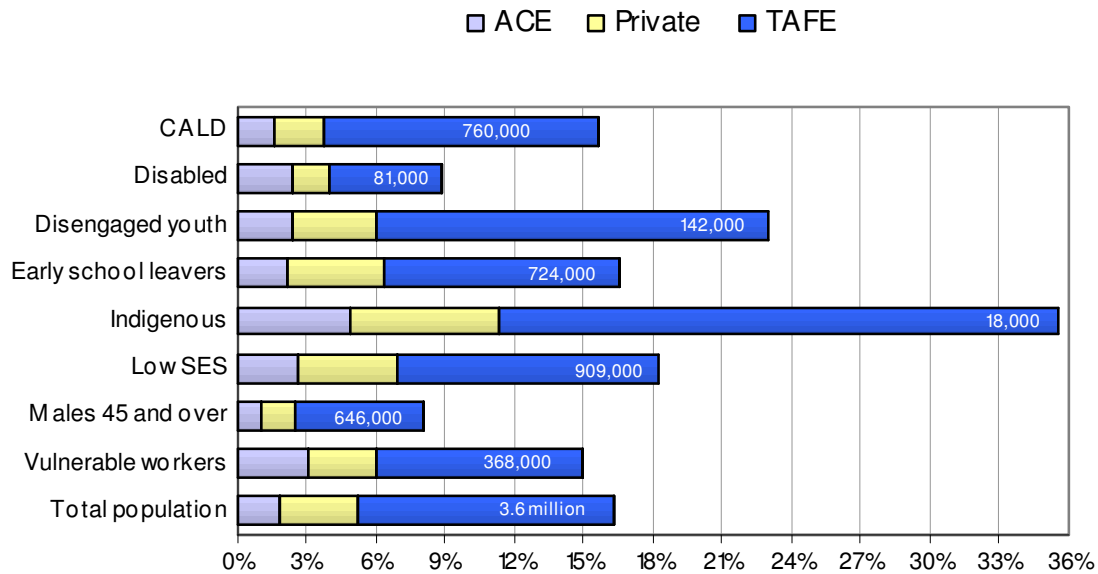


Figure 1 shows the proportion of hard to reach groups in the population attending VET courses across ACE, private and TAFE sectors.

**Figure 2 Hard to reach VET learner participation rates : 2010**

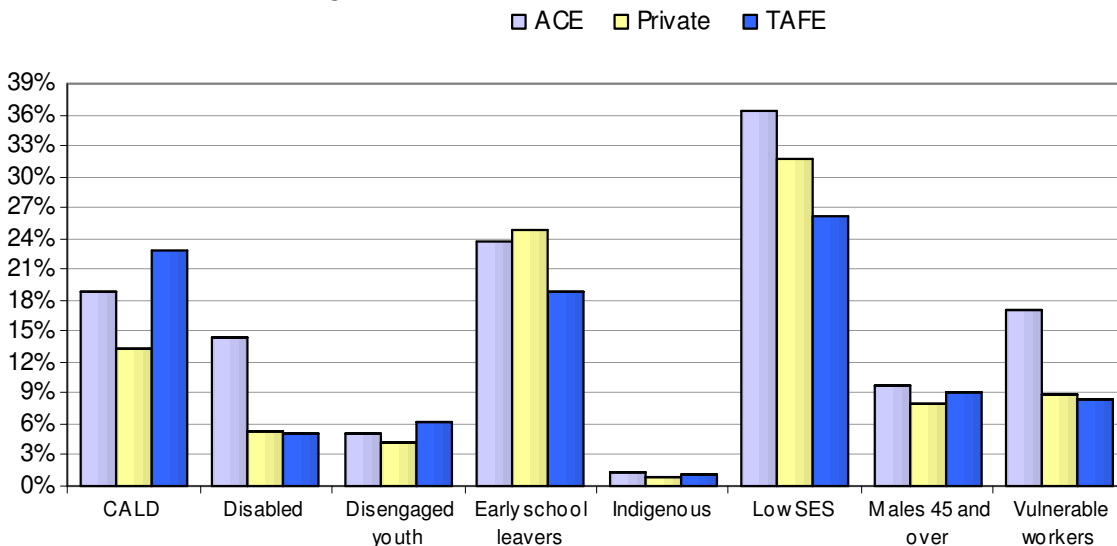


Figure 2 shows the proportion of hard to reach VET learners in the ACE, private and TAFE sectors. For example, TAFE has a larger proportion of learners from CALD backgrounds than ACE. ACE has a larger proportion of learners from a number of hard to reach groups, including low SES localities, vulnerable workers and learners with disabilities, than either TAFE or the Private sectors.