## **AVETRA**

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**2012 AVETRA Conference**

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**Guaranteeing what in a contestable training market ?**

Abstract

The Victorian Government introduced the Victorian Training Guarantee (VTG) as a key policy reform to reorganize VET provision in 2008. Since then the evolution of a training market has been shaped by the shift from a ‘purchaser-provider’ arrangement to a fully ‘contestable’ open market regime. These changes are having far reaching impacts on VET in terms of provision and student experiences. These changes have brought a shift in emphasis with students positioned as consumers and with providers (public and or private) being treated uniformly as market entities.

This paper draws upon submissions to the recent (2011) Essential Services Commission, VET Fee and Funding Review to consider the impact of market approaches to the Victorian VET sector. Many of the submissions made to the review highlighted the costs of a fully ‘contestable training market’. Of the sixty-three submissions to the review, Registered Training Organisations and their representative bodies made thirty-five. In these submissions it was consistently maintained that the VTG represented a significant disadvantage to current and prospective students. Submissions by students poignantly illustrated and provided examples of the nature and character of the unintended inequities in this brave new market context.

This paper argues that consumer protections are urgently needed to ensure more equitable approaches to VET provision.  In order to achieve  improved consumer protections, the paper will argue that cooperation as a core principle is important. For a training market to imply guarantees and be premised upon a robust assurance of quality education this will only occur when a contestable market is arranged through a principle of cooperation.

Introduction

As part of its election commitments the Baillieu Liberal coalition promised a review of VET fees. This was done in order to consider the impacts of the introduction of the Victorian Training Guarantee (VETG). The VTG enshrined a tiered fee structure for VET provision in the State. The review was conducted by the Essential Services Commission and was known as the *“Inquiry into Vocational Education and Training Fees and Funding Arrangements”*. The inquiry received sixty-three submissions and held several public consultations.

The terms of reference for the inquiry included examining the design of the funding mechanism and fee structures and how they contribute to the core objectives of the Victorian Training System. The terms of reference also sought to examine the efficiency and effectiveness of Government funding mechanisms and fees structures. The review adopted the following five principles to determine both the design aspects and the efficiency and effectiveness of the fees and funding arrangements, simplicity, certainty, efficiency, consistency and adaptability. As presented through the inquiry these principles would underpin the VET training market/system as it operated out of Victoria. This paper will argue that the principles adopted by the inquiry did not go far enough as a basis for examining the design aspects of, and the efficiency and effectiveness of the VET fees and funding arrangements. The principle of cooperation was overlooked and ignored. Cooperation is central in any market context and is fundamental to an education market where the exchange of goods and services must be qualitatively robust for value and worth to exist.

The formation of a ‘contestable training’ market where choice is expanded and the quality of the VET experience is increased it will be argued can only occur in a context where cooperation is a cornerstone principle. Yet in the three or so years of the operation of the VTG that has created a contestable training market the submissions to the inquiry revealed an atmosphere of insecurity, division and suspicion in Victorian VET. This was made clear through all of the submissions that either call for a reconsideration of the VTG through the protection of special circumstances and interests. The unanimous point raised in all of the submissions was that the eligibility criteria for accessing government-subsidized training have actually proved to be detrimental to participation in VET.

Consequently the Inquiry into VET fees and funding did not fully address the impacts of the VTG on VET students or providers. It did however provide an opportunity for a point in time public airing of the impact of the fees and funding changes associated with the VTG. The submissions to the inquiry revealed what impacts the VTG has had for a range of VET stakeholders.

Context

For the past three decades, the market has become the metanarrative and, “dominant model for reframing the relationships between skills, supply and demand and for re-engineering the structure, culture and operations of the VET sector (Anderson, 1997, p.1). Throughout this period the TAFE system and later the training system came to be recognised as a market, this was especially the case after the Deveson Review (1990). The shift from understanding VET as an ‘education system’ to explaining and arranging it in market terms was not just a category change but a cultural shift associated with changes in public administration dating back to the 1980s. These changes subjected previously owned government agencies and enterprises such as health, education, and power utilities amongst others to ‘market logics’ (Karmel, Beddie and Dawe, 2009). In Victoria the VET market/system was given shape and form through performance agreements between government and providers (mostly public TAFE and ACE and some private) this arrangement exemplified a purchaser-provider market model with the government as purchaser and allocator of public funds (Anderson, 1997, p.24). Such an approach was based on centralised decision–making and planning that emphasised a supply-side marketised focus.

Through the recent contestability approach developed through the Victorian Training Guarantee (VTG) the market focus shifted to a demand-side market strategy where competition for funds is now underpinned by a commitment to user-choice. As Seddon (2009) maintained, “A demand-driven structure organises buyers and sellers, who make choices about investing in training products”. The difficulty in both supply and demand focused market approaches is that not all providers have the capacity to produce and provide any or all training products and experiences; and students on the other hand as consumers, are all different and in turn are seeking diverse options and choices for a range of purposes in situations. Cooperation is imperative in both supply-side and demand-driven structures yet is important for buyers or consumers who with the right information can access and have reasonable trust in a market that can and will be able to respond by providing or delivering what is being sought.

Consumer protections and cooperation

Instituting the precept of cooperation to underpin a VET market/system would bolster consumer protections in ways that do not presently exist. When there is choice and competition without cooperation there can be no guarantees of quality. Underpinning the possibilities of cooperation in an education market like that operating in Victoria is the recognition and acceptance that suppliers have distinctive characteristics and are diverse in character and therefore in what they can supply to purchasers. On the demand-side, consumers as existing and prospective students and those industries and employers that recruit VET graduates would therefore be better positioned to have trust in the ‘good will’ inherent in such a market/system. Critical sociologies (Sennett, 2012, Bauman, 2000) have theorised that mutual cooperation and competition can be combined. In particular these sociologies underline that cooperation involves forms of exchange. For Sennett (2012) cooperation is premised upon a spectrum of exchanges. This spectrum is made up of five different types of exchange; altruistic, win-win, differentiating, zero-sum and winner- takes-all.

Altruism is concerned with gift giving for selfless reasons and purposes, win-win exchanges are more reciprocal where efforts and benefits are shared by all parties gain. The differentiating exchange involves the establishment of territories and the definition of borders or zones of practice and activity. Through these forms of exchange cooperation is based on differences being encountered without sustained animosity through dialogue and recognising that each party has something to offer. Zero-sum exchanges involve gain at the expense of loss. These win-lose scenarios are neither total nor absolute in that the winner always leaves something for the loser. The final form of exchange outlined by Sennett (2012, p.72-85) is that of winner-takes-all where monopolies are established and total exclusion is achieved. In an education market where access is imperative for social and economic participation the extreme winner-take-all exchanges would inhibit an efficient or effective training market. While altruism may be a real and personable motivation in some aspects of education markets the social and economic necessities are never far away from such simplistic virtuous positions.

It is the three forms of exchange of win-win, differentiated and zero-sum that underpin and characterise contestable markets premised on cooperation. I want to suggest that win-win approaches while important to cooperation are premised upon a uniform and fixed notion of market exchanges while zero-sum exchanges on the other hand would inhibit the adaptability and dynamism of a contestable market. A contestable market that protects consumers through cooperation, lies in a dynamic context where there are a mix of buyers and sellers.

In a contestable context where not only competition and choice are promoted, cooperation premised upon differentiated-exchanges enables the appreciation of difference whilst affirming the distinctive value and worth of each party, interest group or organisation. Differentiating exchanges that characterise cooperation is where differences are known and mediated through negotiation and dialogue. Such affirmations enable the staking out of spaces and a clear articulations of missions and purposes that would resulting in more certainties in a contestable market operating through a principle of cooperation. The consequence of which is to diminish the destructive affect of invidious comparison riven by anger and aggression those two undertows of competition (Sennett, 2012). What could be achieved is competition with reason, logic and purpose. If the main evaluative tool in a consumer contexts is comparison (Bauman, 2000) comparisons of like with like is necessitated. Yet in the context of the VET market/system in Victoria ACE providers’, TAFE providers’, Private providers and the students who ‘buy’ education from these different suppliers cannot entirely compare their products, experiences or promises’ because they are different and distinct. Yet students can, do and will express their satisfaction or lack thereof about their experience and the quality of education encountered in these different contexts. Differentiated-exchanges have long characterised the VET market/system in Victoria, Australia and internationally. VET in schools, VET in the workplace, VET in ACE and through TAFE and private providers are comparable only to a point.

In 2010 the Australian government amended the Trades Practices law to more effectively enshrine consumer protections into Australian markets and its economy. The Competition and consumer Act (2010) and in particular sections 60 and 61 of the act outline the requirements of suppliers that “the services will be rendered with due care and skill”. The Act requires that suppliers (providers) supply services to a consumer on the basis of being ‘fit for purpose’. Researchers (Bessant, 2004, Kamvounias, 1999, 2005, 2006) have outlined the variable success of students challenging universities and tertiary organisations using consumer protection legislation. What the research does indicate is that there is indeed clear juridical acceptance that consumer law does apply to contemporary education contexts. Yet the research varies in views about whether courts are the appropriate place to resolve disputes between students, education stakeholders and tertiary organisations. Whether a contestable market approach free of the principal of cooperation exacerbates or can offer ways to better arrange a ‘fit for purpose’ skills development remains questionable.

Market design and the VTG

Achieving a fair, just and high quality VET depends upon cooperative, thoughtful and dexterous policy and systems or as others refer to it ‘market design’ (Cooney, 2008). Victoria in introducing the VTG has embarked on a path of ‘market design’. The market for Victoria is being constructed iteratively and incrementally because there is no recipe, formula or format by which an education market can be made. In the first four years of the VTG, fee charges, eligibility criteria, concession arrangements and funding mechanism have been adjusted, fixed and refixed, causing inefficiencies due to uncertainty and instability. The ESC inquiry into VET fees and funding represents an important policy episode in this path to an open and contestable VET market. While the notion of a ‘free market’ is as old as Adam Smith what a free and open market means for vocational education is still being made as the market principles evolve through design and policy levers. As it presently stands the fees and funding of VET in Victoria is not occurring through the ‘invisible hand’ of the market but is being engineered through government policy that has not fully taken account of the differentiated supply capacities of providers and diversity of the demand focused motivations of a widening pool of students as consumers.

The Victorian Training Guarantee allocation of government-subsidised tuition to students to undertake VET qualifications is presently occurring through restrictive eligibility requirements have been put in place. Those under 20 years old can access a government subisdised place yet those over 20 y.o. who already hold a post-school qualification cannot. The Victorian Training Guarantee segments VET qualifications, courses, and programs through the classifications shown in the following table.

**Table One: Qualifications and skills funding categories.**

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| Foundation skills |
| Skills Creation (Certificate I and II) |
| Skills Building (Certificate III and IV) |
| Skills Deepening (Diploma and Advanced Diploma) |
| Apprenticeships (Certificate III) |
| Traineeeships (Certificate II, III, IV & Diploma) |

The providers engaged in the VET provision in Victoria include public providers-TAFE institutions, Private (not for and for profit) providers, Adult and Community Education providers (ACE), the Adult Migration Education Services (AMES), secondary schools with VET in Schools programs, enterprises that are also Registered Training Organisations and in Community welfare and employment agencies that have registration as training providers. The market design aspect of the VTG rests upon qualification segmentation and the competition between providers for public funding. The distinctions and differences between providers/suppliers have not been effectively considered to build in efficiencies of scale in this contestable market context. Demand by prospective students/ as consumers will receive government subsidized support if eligible attracting different levels of support depending upon the qualification level.

As it now stands in Victoria the Minster responsible for Vocational Education and Training approves the classification of courses and each year is charged with fixing the maximum hourly tuition fee. Concessions are available for all courses excepting those at Diploma and Advanced Diploma levels (Skills deepening). At this stage in Victoria’s radical market experiment, concessions are granted to those in receipt of a commonwealth health care concession card, a pensioner concession card and those with a Veterans Gold card but not at the diploma and advanced diploma levels. The amount of the concession fee varies by course level and is determined by the minister on an annual basis. Concession fees are also made available to prisoners in transition centres or young people on community based orders. Concessions are central to providing access to education to those who experience significant hardship and those whose attachment socially and economically is precariously insecure. This policy trajectory in Victoria is committed to user choice and user pays and the winding back of the State government commitments to public VET provision.

The review submissions and the key issues

Each of the sixty-three submissions to the ESC review of VET fees and funding contained information about the impacts of competition along with concerns emanating from a lack of cooperation in the market. Each of the submissions outlined the differences between types of provider and these were usually construed as divisions. The submissions included information about the perceived preferential treatment or lack thereof of different types of providers. This took the form of private providers speaking of the privileging of public TAFE providers, and vise versa.

The ACFE sector submissions raised issues about the lower level funding arrangements in the sector in contrast to that allocated to the public and private providers. A community provider does not have the scale of large public providers, and specialist private providers who are also differentiated by their particular focus and scale. The current market as arranged in Victoria based on contestability misrecognises that there can be no contest without cooperation. An unfettered market that does not know and recognize differences is socially, politically and economically irresponsible as it provides very little basis for cooperation and engagement. It results in costly and destructive practices that foster the exploitation of differences as divisions.

All of the submissions contained evidence of the uncertainty of the contestable market. While many submissions sought to argue for the potential of making places available for students through the VTG many bemoaned the complexity and opacity of contestability. It was the uncertainties and insecurities involved in the VTG that were made abundantly evident through the vast majority of submissions.

**Table two: Stakeholder type submissions by number**

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| **Submission** | **Number** |
| Adult and community education | 19 |
| Industry | 16 |
| TAFE | 11 |
| Individual | 9 |
| Private RTO | 5 |
| Secondary School | 1 |
| Local government | 1 |
| Research | 1 |
| Total | 63 |

In examining the submissions made to the Essential Services Commissions inquiry into VET fees and funding the unity of concern about a preoccupation with competition and choice at the expense of other principles was overwhelming. Providers (public, private, adult & community, enterprise), industry, students and community stakeholders all expressed reservations about the shortfalls and detrimental effects of the reform processes. This was evident in every submissions critique of the restrictive eligibility requirements premised upon student age, previous qualification held and the type of course being pursued. While the Victorian government has lauded the direction of these reforms through increased participation rates, all of the submissions highlighted the need to be vigilant about the quality of VET.

The following table outlines the submissions made by organisations and a summary of the key issues developed and presented in the submissions by the different stakeholders in the VET market/system. (See appendix one)

**Table three: submission stakeholder category and key issues themes of submission**

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| --- | --- |
| **Submission** | **Key Issues** |
| Adult and community education | * Lower funding * Learners with high support needs * Administrative Costs of contestability * Administration of VET FEE HELP * Geographic and local concerns |
| Industry | * Fees shock * Complicated market rules * Eligibility criteria locks out mature aged workers * Skill shortage areas require special consideration * Apprenticeship and pre-apprenticeship and VET in schools * Job Services Australia fees represented a loophole to VTG fees |
| TAFE | * Detrimental affects on enrolments * Pricing people out of VET * Out of synch with Higher education reforms and uncapped places * High compliance costs |
| Individual | * Student concerns * Teacher frustrations * Policy inconsistencies |
| Private RTO | * Eligibility criteria * Pricing of courses undercutting participation * Structural separation |
| Secondary School | * Ensure sustainability of VET in schools * Affordability of VET in schools |
| Local government | * Importance of VET for regional participation and development |
| Research | * Evidence based policy |

The rest of the paper will outline the key themes as raised by each of the submission types as presented in the table above. The themes selected are concerned with the specific impacts they relate to the different stakeholder groups.

Discussion

What is clear from the outset is that the submissions represent a spread of stakeholders who were motivated to make a written submission. Interestingly the largest number of submissions from provider groups came from the Adult and Community Education sector with nineteen submissions followed by TAFE and private RTO’s with a combined number of sixteen. Together with the submission from the secondary school thirty-six providers and several individual submissions from students and teachers alike all sough to make the case for a more inclusive and fairer contestable training market.

The Adult and Community Education sector has a 13% share of government funded VET activity, with TAFE having 61% and private sector having 26% (Allen, 2011). Of the nineteen submissions made to the review from the ACE sector the eligibility criteria and concession fees were raised as an ongoing concern. The submissions emphasised that the learners in the ACE sector usually have higher learning support needs and that many of the people they provide education to are not equipped socially or intellectually to attend large TAFE or private providers. The ACE submissions queried the lower funding they were allocated at the Student Contact Hour (SCH) rate which is less than that allocated to TAFE/Private RTOs. The inconsistency of this allocation it was argued did not take into account the intensive education and training work undertaken by the sector given the teaching requirements of those attending ACE providers. The eligibility criteria were described as restrictive and unnecessarily complex with the segmentation of qualifications into five categories adding further complexity. There were also suggestions made that the offerings in the foundation category need to be expanded.

Concern was expressed in several submissions that a preoccupation with completion rates would marginalise many ACE learners and that the benefits of participation was being devalued. This was seen to be especially the case for ACE providers working intensively with a range of ‘hard to reach’ learners in metropolitan and regional and rural settings. The funding and fee structures were identified as working against intensive engagements with learners with extra support needs. Learners with intellectual disabilities or acquired brain injuries, it was pointed out required continual education opportunities to reinforce learning and that the possibilities for such approaches were being undermined by the funding and fee arrangements. The less formal culture in many ACE providers the submissions argued enable vulnerable people to access VET in environments responsive to and useful to their personal and local contexts.

Industry submissions expressed concern that the unintended consequence of the VTG was that it impeded lifelong learning and reskilling. An example of the limited effects of the eligibility criteria is poignantly made in a submission from the building industry.

*‘*Sally’, a 21 year old, has been working in a café since leaving school 4 years ago. She wants to improve her earning capacity and change career through becoming a plumber, realising the benefit of having a trade in an area that has great potential. The best way to enter this industry is through a pre-apprenticeship – a Certificate II in Plumbing. During her first year of employment at the café Sally’s employer put her through a 6 month Certificate II traineeship in Hospitality. Sally is now ineligible for government funding and what would have been a $600 course is now $2000, on her current income she cannot afford this fee (Building Industry Consultative Committee).

Another submission argued that low cost training would not guarantee or result in high quality skills outcomes. The point being that fee hikes were also a disincentive to increase targets for those achieving qualifications as specified by government targets. A major concern was that the VTG would not address or ameliorate the consequences of skills shortages.

An industry submission from the dairy industry raised the issue of ‘fees shock’ and was actively negotiating through its submission and other activity for the re-categorisation of its skills to a lower qualification level to make skills development more affordable. What was once a $387 program had increased to $2,272 (Dairy industry). Another submissions from the building and housing sector were also concerned about the eligibility criteria of prior qualifications foreclosing the option of a government subsidized place and suggested that a ‘sunset clause for prior qualifications’ be adopted to make the criteria more flexible.

Many other industry submissions were concerned that apprenticeships should be protected and that better incentives put in place for priority skill areas. One industry submission by an enterprise that is also an RTO expressed dismay they had to charge their own employees a fee and seemed perplexed by such a fees and funding system. Industry was also concerned with the impact of fees on pre-apprenticeships, school based apprenticeships and VET in schools.

A metropolitan TAFE in its submission argued that, “The funding model should encourage cooperation and regional participation and competition based upon quality of outputs (Holmesglen)”. Many of the TAFE submissions considered the VTG a “bold experiment” that may result in jeopardising the viability of skills education and training by deterring prospective students. Many TAFE submissions reported a decrease in their enrolments because of the fee increases. One TAFE explained that the funding of training did not reflect the true cost of training. While another TAFE submission argued there was a need for investment in training from industry and employers and not just the present focus on increasing student contributions.

Northern Melbourne Institute of TAFE (NMIT) made a strident submission arguing that, “the Skills Reform policy is a thinly disguised initiative to increase statistical VET participation across Victoria, regardless of training quality and integrity, and delivered at times on a user pays/cost recovery basis, regardless of the training requirements of industry and the needs of individuals across the life span. NMIT believed from the outset that this was an attempt to largely privatise the VET system by stealth based on unproven and spurious assumptions.

Nine individual submissions were made and several of these submissions were from teachers from ACE, TAFE together with students and one from a policy analyst and education journalist and commentator. One student expressed concern about fees and argued in an exasperation,

If the Government makes it so hard for lower class young people to get an education most of us will end up relying on the government for the rest of our lives (Erin Adams).

An individual teacher’s submission was equally concerned and wrote that the funding and fees structured that make up the VTG were not logical. The submission requested a need for better-informed policy or market design.

“I suggest that people making funding decisions need to come out and see what we do and talk to us about how we can put a better system in place where we are able to focus on the quality of our training rather than trying to make our training match an ill conceived funding model. I would also like to spend more time with each student than dotting i’s and crossing T’s because someone doesn’t trust that we are doing our job (Russell Masterson)”.

Submissions from private RTO equally critiqued the restrictive nature of the eligibility criteria and the equivalence between senior secondary certificates of education with a Certificate II. Both these points were the basis for claiming that the result would be reduced access and participation. The eligibility criteria were also critiqued on the basis of discrimination against older or mature aged workers being limited in accessing funded VET options. Private RTO’s reported an increase in enrolments from 2008 and argued for structural separation of funding allocation from public RTO’s. The submission by ACPET announced that

“Private training institutions are now arguably the ‘engine room’ of the Australian training sector”.

Such claims belie the contributions made by the ACE, TAFE, industry and enterprise aspects of the VET market/system. One submission by a private RTO argued that, “the non-subsidised cost of our most popular course (Diploma of Nursing) is “beyond the reach of the majority of our potential student demographic”.

Policy development processes and market design strategies in this instance are notoriously political and different stakeholders and interest groups seek to influence their directions through such reviews. Whether one type of provider or some sorts of student choices or industry preferences are more important than others, is always a matter for debate. Yet the important function of VET in offering education opportunities to diverse groups of learners in a breadth of vocational fields and through a range of organisations is central to growing the workforce skills base in Australia. The submissions from the groups as presented in this paper contain important critiques of the market and its haphazard character as it is currently struck. Yet the submissions also contained information that competition for the sake of competition has little real dividend in terms of quality. Such competitive jostling guarantees a contestable VET market/system that errs on the side of winner-takes-all, where the annihilation of important players in the VET market/system is enabled through a contest without cooperation.

Conclusion

The need for cooperation in striking a more just contestable VET market where increased access can be facilitated and not thwarted seems to represent a missed opportunity in the VTG. Consumer protection is imperative to a fair and healthy VET market/system that fairly and affordably increases the skills base of the workforce. This can only be achieved in a contestable training market premised upon policy and operational contexts characterised by co-operation. That is, cooperation between different parties and interests groups that shape and affect VET provision. With a broad range of provider types engaged in the VET market/system this would clearly depend upon the recognition and acceptance of the particularities of each group and its place in a contestable training market. Through the submissions made to the review it becomes abundantly clear that as it is presently set the VET market/system as arranged through the VTG does not enable this and at it’s worst repels just those people it seeks to attract.

Unless cooperation is made a core component of a contestable market, the VTG will guarantee a VET market/system that produces disappointed students, unsatisfied skills requirements for industry and providers pitted against each other for no real gain. It seems that as a result of these reforms there are significant issues being played out in Victoria’s bold reform experiment that are challenging the viability of Victoria’s VET system. The policy emphasis on choice and competition is occurring with little regard for cooperation and the capacity of the Victorian VET market/system to protect consumers from unscrupulous and poor quality education. Ones needs look no further than the media reports over the last four years of international students not receiving proper education, exorbitant fee hikes not to mention the high profile closures of several RTOs. Without cooperation there can be no consumer protections or implied guarantees of quality VET in Victoria’s contestable environment.

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**Appendix One: Submissions to the ESS, *“Inquiry into Vocational Education and Training Fees and Funding Arrangements”***

1. Box Hill Institute
2. ACE DisAbility Network
3. Swinburne
4. [Gary Buckeridge](http://www.esc.vic.gov.au/NR/rdonlyres/218B25B6-B7F5-4186-BB1E-3F1FA470465C/0/GaryBuckeridge.pdf)
5. Confidential Submission
6. Australian College of Applied Animal Studies
7. Confidential Submission
8. Confidential Submission
9. Russell Masterton)
10. Victorian Farmers Federation
11. Adult Community and Further Education (ACFE) Board
12. Upper Yarra Community House Inc
13. YHN Services
14. Corporate Partners
15. The Victorian Automobile Chamber of Commerce (VACC)
16. Brotherhood of St Laurence
17. Erin Adams
18. Inner Eastern Local Learning Employment Network
19. Springvale Learning and Activities Centre Inc.
20. Confidential Submission
21. Inclusion Melbourne
22. Holmesglen
23. Association of Neighbourhood Houses and Learning Centres (ANHLC)
24. Glenroy Neighbourhood Learning Centre
25. Gavin Moodie
26. BRACE
27. Victorian Tafe Association
28. RMIT
29. Building Industry Consultative Council Industry Advisory Body
30. Holden Street Neighbourhood House
31. Careers Australia
32. Majorie Milner College
33. Volunteer Fire Brigade Victoria (268k)
34. Sunraysia Institute
35. University of Ballarat
36. Courthouse Community Centre
37. Victorian Food Industry Training Board
38. Thinkwest Cluster
39. Australian Education Union - Victorian Branch
40. Victorian Technical Education
41. Automotive Training Victoria
42. Dairy Industry
43. Northern Melbourne Institute of TAFE
44. Carter Holt Harvey
45. Gippsland Local Government Network Secretariat
46. Primary Skills Victoria
47. Otway Community College
48. Campaspe College of Adult Education
49. [Odyssey House](http://www.esc.vic.gov.au/NR/rdonlyres/A495A2BB-BCB7-494D-9B58-5F9CA7EE4E65/0/OdysseyHouse.pdf)
50. Community College Gippsland
51. Australian Education Union - Victorian Branch
52. Housing Industry Association
53. Forestworks
54. National Centre for Vocational Education Research
55. Leigh Cook
56. Rowville Secondary College
57. Victorian State Agriculture Provider Network
58. Australian Council for Private Education Training
59. Shearer Woolhandler Training
60. AgriFood Skills Australia
61. Albury Wodonga Community College
62. National Meat Industry Training Advisory Council Limited
63. GoTAFES

All submissions accessed and downloaded on the 18th December 2011 from http://www.esc.vic.gov.au/ESC/Templates/Consultations/ConsultationSubmissions.aspx