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Australian Skills Quality Authority

ASQA

Strategic review of online learning

Final report

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ASQA

Executive summary

The Australian Skills Quality Authority (ASQA) is the national regulator for vocational education and training (VET) and supports the delivery of quality VET by ensuring consistency with the nationally approved *Standards for Registered Training Organisations (RTOs) 2015* (the Standards). Our purpose is to ensure quality vocational education and training so that students, employers, governments, and the community have confidence in the integrity of national qualifications issued by training providers.

Introduction

The Strategic Review of Online Learning in the VET sector was undertaken to address a regulatory risk identified in ASQA's Regulatory Strategy 2020-22 and in the 2021-22 Regulatory Risk Priorities. We have undertaken this review to analyse the opportunities and risks of online learning and to identify the nature of our regulatory response.
It has taken place at a time of growing importance of the sector's response to COVID-19 pandemic, as well as digital technologies for innovative delivery of education services, and a skilled labour force identified as central to this growth (Productivity Commission 2022).

The coronavirus (COVID-19) pandemic has accelerated the sector-wide expansion of online delivery. In general, prior to the COVID-19 pandemic, online learning was one mode of delivery used in the Australian VET sector but in a limited way. In response to the pandemic, most providers made significant changes to increase their use of this mode of delivery and many invested heavily to ensure quality continued. Similar changes also took place in the tertiary sector (TEQSA 2021).

While there is no one-size-fits all approach adopted by providers to online delivery, the conditions brought by the COVID-19 pandemic forced a rethink of assumptions for many about what could be delivered online.
Notably, the early 2021 survey ASQA undertook of providers' shift online found that 62% of those who shifted in response to COVID-19 were likely to employ more blended learning in the future (ASQA 2021).

Providers of English Language Intensive Courses for Overseas Students (ELICOS) reported transitioning to fully online (31.4%) and blended (35.8%) modes of delivery. Of all the survey respondents, nearly 30% of providers delivering to international onshore students moved to fully online, and nearly 90% moved to offering some training or assessment online. Providers delivering to international offshore students had over 25% move to fully online and over 80% move at least some training or assessment online.

The shift was particularly significant for Education Services for Overseas Students (ESOS) providers who pivoted from a position of only being able to offer a small portion of training and assessment online (or none, in the case of those delivering ELICOS), to being able to temporarily offer courses fully online.

The legislative and regulatory frameworks governing the Australian international education sector have a primary focus on face-to-face delivery in Australia. The existing ESOS framework requirements on online and overseas study are Standard 8 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code), which explicitly limits online study by international student visa holders to no more than one third of their course, and at least one face-to-face unit in each study period. The *ELICOS Standards 2018* (ELICOS Standards) Standard P1 requires a minimum of 20 hours of face-to-face scheduled course contact per week because of the importance of cultural immersion and student welfare in achieving the learning outcomes.

ASQA and TEQSA announced flexibility in regulatory arrangements and requirements to enable providers to support students to study online either in Australia or offshore. As long as the student remained enrolled with their provider, and the assessment requirements of the course allowed it, the location of the student and the mode of delivery would not prevent the student from attaining an Australian qualification.

ASQA

Methodology

The review engaged with students through focus groups, implemented a provider survey of the VET sector's use, experience, and perceptions of online learning jointly administered with the National Centre for Vocational Education Research (NCVER), and consulted ASQA staff through a workshop and focus group series. ASQA also held a webinar series and published an insights paper series that can be found on ASQA's website here.

ASQA also commissioned two research pieces to explore both the constraints on, and the opportunities of, delivering two qualifications from the most-impacted training packages delivered partly online. These qualifications are:

- CHC33015 – Certificate III in Individual Support
- SIT30816 – Certificate III in Commercial Cookery

The report features a small number of vignettes from this research to showcase short scenarios that illustrate what may be possible for online delivery. The research can be found here.

Findings

The review found that whilst quality VET can be delivered online, taking into consideration the requirements of the training product, the student cohort, the skills of the trainer and assessor, and the tools, technologies, and processes for delivering online, the challenges, opportunities and risks vary depending on those factors. There is no single issue or feature that is an indicator of greater or lesser risk to quality.

The rapid shift online by many providers during the COVID-19 pandemic, however meant that some had limited or no experience in that mode of delivery. This has increased the prospect of some providers operating in the market with immature risk assessment and self-assurance systems in place to assure quality outcomes for online or blended delivery.

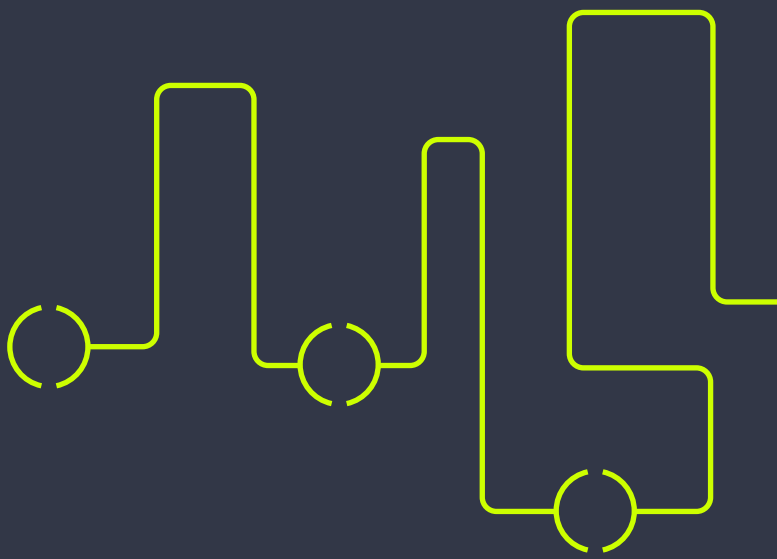
Risks for online delivery for students include:

- not ensuring they are appropriately prepared for, and supported to, undertake learning online, and not sufficiently taking into account the student's literacy, language, numeracy and digital (LLND) skills
- not taking into account the student's learning style
- not being equipped to meet the delivery mode's technological requirements for participation
- students not being informed of, or sufficiently understanding, the mode of delivery being offered.

Risk related to training and assessment include:

- insufficient digital literacy skills of trainers and assessors
- training and assessment that it is not suitable and/or is not being delivered effectively online
- training and assessment not designed or adapted for online delivery
- online delivery does not meet the requirements of the training product
- insufficient checks and balances in place to assess a learner's competency or verify the authenticity of the learner.

The review also found that many students prefer the flexibility of blended learning, and this expansion and preference bring opportunities for providers to expand their offerings and provide students with more choice across the market.



Regulation

The review identified the following provider accountabilities and relevant clauses of the Standards for regulatory focus and assurance of quality outcomes:

- giving accurate and accessible information about mode/s of delivery to prospective students, particularly, that the information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and accurately represents the services it provides (Standard 4.1 (a)) in relation to blended learning or learning fully online
- ensuring that all trainers undertake professional development in the fields of knowledge and practice of vocational training, learning and assessment (where appropriate, taking account of the digital literacy skills of trainers and assessors) (Clause 1.16) and support RTOs to self-assure their practice in complying with this standard
- ensuring each learner is properly informed and protected when considering and undertaking blended learning or learning fully online (Clause 1.2, 1.3, 5.1 and 5.2), including, where appropriate, the suitability of any proposed use of asynchronous (self-paced) learning.

ASQA has committed to five actions as a planned program of work to address risk, and support providers to self-assure against the required Standards and to continuously improve the quality of VET delivered online including through provider education and ongoing proportionate monitoring of the risks of online delivery. These actions support ASQA's purpose to ensure quality VET through our regulation and partnership with others, so that students, employers, the community and governments have confidence in the integrity of national qualifications issued by training providers.

ASQA has also identified policy considerations to be raised through our engagement with the Department of Education and Department of Employment and Workplace Relations.

Actions arising from the review

Examination of identified risks and key clauses of the Standards will inform ASQA's regulatory approach and support quality outcomes through the following actions.

Action 1.

Through our integrated, planned and risk -based approach to regulation ASQA will undertake performance monitoring of a sample of providers delivering products of concern online, including a focus on specific provider responsibilities under the Standards. We will report on the outcomes of these regulatory activities including sharing insights with the sector.

Action 2.

ASQA will strengthen existing education products and develop new guidance to support providers to self-assure their operations and continuously improve performance against the Standards in the context of risks of online delivery. ASQA will test these products with stakeholders to ensure they're fit for purpose and deliver on intended outcomes.

Action 3.

ASQA will develop guidance for its quality assessors to support consistent application of the Standards and ensure assessment practices keep pace with innovation in relation to online delivery.

Action 4.

Ordinarily, English language qualifications delivered under the ESOS Act cannot be delivered fully online, because of the importance of cultural immersion in achieving the learning outcomes. Explicit allowance for fully online delivery of these qualifications was made by ASQA and TEQSA as a temporary measure in response to COVID. Support for ELICOS providers and a planned approach to return to compliance with the ELICOS Standards should be considered in consultation with stakeholders.

Action 5.

ASQA will consider the risks associated with delivering online learning and the self-assurance systems in place to assure quality outcomes for online or blended delivery when considering the overall level of risk for an applicant or registered provider, and the broad range of regulatory approaches to respond to the relevant risks identified.

Consistent with ASQA's Regulatory Operating Model (ASQA 2021, p.9), these actions will involve actively engaging with stakeholders and the regulated community to work collaboratively to enhance quality VET delivered online.

Policy considerations

Policy consideration 1.

ESOS Agencies should monitor the data sources available to understand achievement of learning outcomes, student support and wellbeing required of ELICOS providers. This will provide greater assurance of market maturity and inform any future policy settings.

Policy consideration 2.

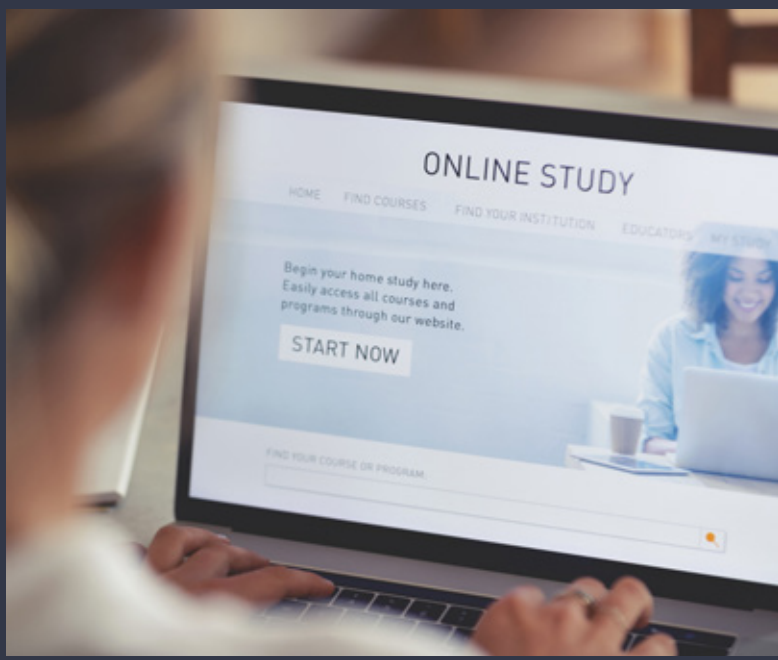
The Department of Education to consider ways in which the outcomes intended by requirements set out in Standard 8 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code) and the ELICOS Standards can be safeguarded whilst not constraining expansion of English language training by ELICOS providers.

Policy consideration 3.

In developing policy in relation to the applicable Standards, the Department of Employment and Workplace Relations should consider provider responsibilities including trainers and assessors having the appropriate capability to conduct training and assessment online; ensuring the authenticity of online assessment; and appropriate training and wellbeing supports for students studying online. The review of Standards for Registered Training Organisations currently under development by DEWR is an opportunity to support quality assurance of training and assessment delivered online.

Policy consideration 4.

The current review of the Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS) led by the National Centre for Vocational Education Research (NCVER) could provide improved data and definitions to capture the diversity and characteristics of the online market. This would assist ASQA to better target our regulatory activities to address risk and support providers to deliver quality training and assessment online. The availability of up-to-date information on public websites linked to the AVETMISS data, namely My Skills and training.gov.au, is also critical for students, funding authorities and employers to make informed choices about training.



Section 1. Background

The coronavirus (COVID-19) pandemic has been a major catalyst of change for training providers and provision of training across the world. Australia's VET and international education sectors faced major disruption, and many providers shifted to online delivery to continue training while keeping staff and students safe. 'The acceleration in the uptake of technology by business and individuals has stimulated growth in remote work, online commerce, businesses' digital presence and innovative delivery of public services like health and education' (Productivity Commission 2022).

Prior to the commencement of the Strategic Review, between March and July 2020, more than 1000 providers—including around 450 Australian education providers approved to teach overseas students known as Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) providers—advised ASQA that they now deliver all or a number of their courses online, as a direct result of COVID-19. In addition, ASQA's analysis of provider behaviour between 23 March and 31 May 2020 identified that 554 providers added 1401 qualifications and/or units of competency to their scope of registration. Of these, 71 were also CRICOS registered providers.

Emerging issues at that time in relation to COVID-19 were reported to ASQA over a similar period by way of complaints including that in relation to online delivery, providers were not amending course content or resources to suitably deliver online training. Similarly, concerns from learners were raised in relation to meeting their work placement/practical components. In some cases, this may have resulted in learners receiving inconsistent advice and/or training and assessment.

ASQA continued to work closely with other Australian, state and territory government agencies and the sector to respond to the unique challenges presented by COVID-19, including implementing a COVID-19 Risk Monitoring Strategy to support providers in managing key risks.

ASQA's response was multi-faceted and included the development of extensive guidance to support providers in shifting to distance learning and online delivery, such as online resources and advice on managing COVID-19 training risks. These were refreshed as part of the strategic review and are available on a dedicated page on ASQA's website. The pandemic has highlighted the importance of education and training in helping business and individuals gain the skills or reskill in order to adapt to change. It has also highlighted some of the challenges the sector may continue to face in providing online education into the future.

1.1 Scope of the strategic review

The following activities were undertaken as part of the scope of the strategic review:

- research on risks and benefits associated with online and distance learning in the VET sector, including potential areas of innovation, and building an increased understanding of specific learning platforms and the range of technologies available for achieving learning outcomes
- consultation with stakeholders to identify and analyse benefits, opportunities, risks and barriers associated with the transition to online and distance learning during the COVID-19 pandemic, including:
  - understand the student experience of the transition to online learning and other impacts of the pandemic on training
  - the implications for quality training delivery, assessment and student engagement
  - any capability building of providers trainers and assessors for quality online learning
  - the extent to which providers intend to continue/extend their online and distance learning delivery.
- consideration of international education changes in online and distance learning, and any specific risks presented in this context
- internal consultation to identify the challenges, risks and opportunities for ASQA in effectively regulating online delivery and assessment, including identifying ways in which these challenges could be overcome, and the actions required to ensure ASQA is able to effectively regulate online learning without creating regulatory barriers to sector innovation and growth
- consideration of ASQA's approach across its regulatory functions, including education, monitoring and assessing performance, and ensuring the quality of online delivery
- development of education and guidance materials for providers released at key points during the strategic review (feedback loop webinars and the insights paper series) to support sector insights and learning
- development of this final report, comprising findings, actions and policy considerations that enable ASQA to promote and support the provision of quality online learning outcomes for the Australian VET sector.

Responding to sector feedback – clarifying face-to-face

As part of engaging with the sector during the strategic review, members of our Stakeholder Liaison Group (SLG) advised us that some providers were seeking clarification about what is permissible as face-to-face learning. ASQA engaged in internal consultation with performance assessment and other expert staff within ASQA to ask if there were scenarios or circumstances where face-to-face could include virtual mediums such as video calls.

This engagement identified that it may be possible in some circumstances, but that it is important to distinguish between whether the virtual engagement is synchronous (at the same time) or asynchronous (self-paced). Synchronous training can meet the requirements of being face-to-face, whether in a virtual (online) space or co-located in the same place. The advice was published as a 'tip of the month' in late 2021:

> ***Tip of the month*** *(ASQA Update November 2021)*
>
> *Did you know?*
>
> *Training that is defined as 'face-to-face' can be delivered online unless it is specifically mandated against in the training package. When making the decision to deliver training online, training providers need to be sure that processes are appropriate for your student cohort, the topic and activities, and that students are being appropriately engaged in live two-way feedback with a trainer.*
>
> *ASQA will provide more guidance on getting the best outcome from online learning and assessment in upcoming months.*
>
> **Please note, providers delivering to international students must deliver in accordance with the requirements of the National Code.*

1.2 What we did

Stakeholder consultations commenced in November 2020, including drawing on the advice and experience of our Provider Roundtable and Stakeholder Liaison Group (SLG). We established an SLG subgroup to support the review.

ASQA undertook engagement internally with a staff workshop in August 2021 and 7 follow-up focus groups between September and October 2021 with senior ASQA quality assessors and compliance officers. We complemented this engagement process with analysis of a sample of regulatory data, comprising 12 performance assessment reports and 7 complaints records. The detailed methodology and insights from this process are outlined in Appendix 1.

In February 2021, ASQA launched a survey of the VET sector's use, experience, and perceptions of online learning as part of our strategic review of online learning ('the survey'). The survey was jointly administered with the National Centre for Vocational Education Research (NCVER[1]). It was distributed to all registered ASQA-regulated Australian VET providers on 19 February 2021 and was open for one month. A total of 1,247 responses were received, corresponding to a response rate of 38% of the ASQA-regulated VET provider population. This survey was designed to build understanding of the extent to which VET and English language training providers moved online in response to COVID-19. The survey examined the nature and range of delivery modes providers are using to deliver online learning. This included a focus on identifying whether there are regulatory barriers to sector innovation and growth in online delivery, and how the shift to online learning during COVID-19 might change the way VET is delivered and assessed in the long term. The survey's findings are reported on in our third Insights Paper here. We commissioned Griffith University to undertake analysis of qualitative responses to the survey which has further informed the strategic review, the full analysis is contained in Appendix 2.

To build on this analysis, Griffith University undertook targeted analysis of the possible opportunities and parameters of delivering online through two Certificate III-level qualifications: CHC33015 Certificate III in Individual Support and SIT30816 Certificate III in Commercial Cookery. We did this in response to feedback that the sector is seeking greater clarity about what the national regulator may or may not consider as acceptable training and assessment practices using an online delivery mode (whether partly or fully online). The results of this research are published on ASQA's website.

Exploring opportunities for innovation through Certificate III qualifications

We commissioned two research pieces to explore both the constraints on, and the opportunities of, delivering two qualifications from the most-impacted training packages delivered partly online. These qualifications are:

- CHC33015 – Certificate III in Individual Support
- SIT30816 – Certificate III in Commercial Cookery

The research drew on data from responses to the survey (described in detail in Insights Paper 3 here), training package enrolment data, as well as documents outlining requirements associated with the particular qualification. These documents included the training package itself and companion volume implementation guides. A key document was the specific unit/s of competency within each qualification.

1 NCVER publications that draw on the results of the ASQA-NCVER survey of providers' use, experiences and perceptions of online can be found here (part 1) and here (part 2).

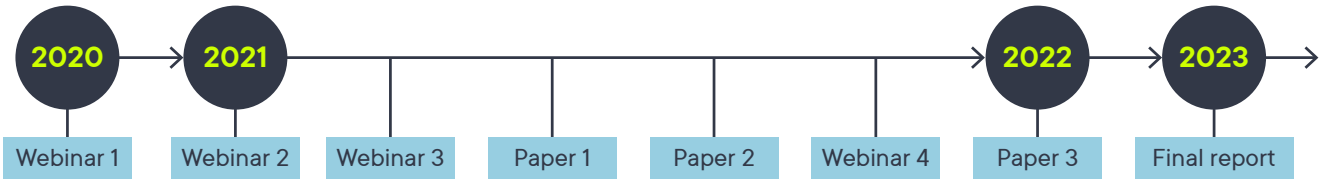
The focus on Certificate III qualifications was due to the importance of practical learning and assessment at this level. Practical application is involved in higher competency-based qualifications, but often base-level practical skills are assumed at that level and greater use of online delivery is feasible.

The research provides detailed insight into the ways providers did respond, or might have responded, to the challenges faced during the COVID-19 pandemic. This 'might have' responded aspect is valuable for its potential to encourage innovation in the sector.

Throughout the report we also feature a small number of vignettes from the research. The intention of the vignettes is to showcase short scenarios that illustrate what may be possible for online delivery.

ASQA gathered and shared information iteratively throughout the review. This included promoting continuous improvement and taking an innovative approach to engagement through the delivery of 'feedback loop' webinars between December 2020 and December 2021 and an insights paper series published periodically between September 2021 and April 2022. These papers were designed to provide and validate information back to the sector following a period of consultation. Three insights papers were published as part of this series. The in-depth research underpinning a planned fourth insights paper, relating to VET and student choice, has been incorporated into this final report instead of being published separately. These publications can be found on ASQA's website here.

Figure 1. Timeline of Strategic Review Engagement



The webinars and papers were designed to:

- be timely and responsive to the engagement and information considered and analysed at various points during the strategic review
- support providers in understanding and delivering quality online learning, including supporting provider self-assurance
- respond to challenges and/or information needs identified by providers or other stakeholders
- highlight best practice
- identify potential trends and/or future directions
- engage with the sector on the findings of the strategic review.

This final report builds on the insights of those papers, as well as original research we commissioned as part of the strategic review. We are publishing this research exploring the risks, opportunities and challenges of online learning to support the sector during the maturing of its use of online learning.

1.3. The VET sector and online learning

The COVID-19 pandemic has profoundly impacted education and training worldwide. Australian VET was no exception. In general, prior to the COVID-19 pandemic, online learning was a mode of delivery used in the VET sector but in a limited way.

Australian VET's first notable uptake and involvement with digital technologies for delivery and assessment was in the 1990s. At that time, e-learning as it was mostly known, became a distinct area for innovation. It was part of a range of policy initiatives collectively known as 'Flexible learning' that encouraged new types of delivery (Hodge 2020). In particular, the 'Australian Flexible Learning Framework' was the policy platform for this work. The framework actively promoted the VET sector's move towards e-learning.

Research suggests that in the period from the 2000s up to 2019, there was stagnation and arguably a small decline in VET online learning activity (Appendix 2). The COVID-19 pandemic has decisively reversed this in many industries and the general view is that this growth is set to become a longer-term trend (e.g. TEQSA 2021).

While there is no one-size-fits all approach adopted by providers to online delivery, the conditions brought by the pandemic forced a rethink of assumptions for many about what could be delivered online. Notably, the early 2021 survey ASQA undertook of providers shift online found that 62% of those who shifted in response to COVID-19 were likely to employ more blended learning in the future (ASQA 2021c).

During this strategic review we have found that the challenges and opportunities of this mode of delivery experienced in this recent period of growth are not dissimilar to those identified during e-learning period. In particular, the observation that online learning is often characterised by features that can be experienced *both* as beneficial and as a challenge (Brennan et al. 2001, p. 65). These 'tensions' include, on the one hand, benefits such as:

- online delivery of VET can create a community of learners
- online delivery can facilitate new and exciting modes of communication between learners and facilitators
- online delivery can require small modifications to previous pedagogies.

On the flip side, those benefits can also be experienced as challenges, for example:

- online delivery of VET can create learner isolation
- online delivery can further isolate those already isolated by distance, socioeconomic circumstance and other equity barriers
- online delivery can require completely new ways of teaching and training.

The findings of this review, and the actions and policy considerations, engage with the dual nature of these tensions. For example, enhanced education and guidance material will be designed to encourage providers to take account of the needs of each individual student.

The next section touches on ASQA's engagement with this evolving mode of delivery as a mode of delivery that is an increasingly common feature of the VET landscape.

1.4 ASQA and online learning

Prior to the COVID-19 pandemic, there were some views expressed that ASQA was not supportive of providers utilising online delivery methods. For example, there was a view expressed that ASQA saw online delivery as an inferior mode of delivery; and/or that ASQA inconsistently regulated VET online. For example, in a NCVER 2019 report about online delivery of VET qualifications (p.51), some interviewees noted the following concerns:

> 'Despite the claim that the formal regulatory approach for online courses did not differ from that for courses delivered via other means, some of the interviewees firmly believed that regulators, and more specifically, some auditors, have negative views on online delivery. Some interviewees stated:
>
> *We want ASQA to treat and judge face-to-face and online fairly, equally. You can't assume everything has happened correctly in face-to-face either, but it might be more onerous for online.* (Compliance area)
>
> *It's catch 22. ASQA and the government encourage the use of technology, but auditors hate it.* (Fitness)
>
> Negative perceptions of online training were deemed unfair by interviewees as there was also a view that online learning and assessment is often better than that done face to face:
>
> *Online assessment has been under a lot of scrutiny and so a lot of effort has been put into it. It's often better than written assessment in face-to-face courses which can be poor.* (Leadership and management)
>
> *Another perception is that the government thinks because it's online it's not thorough. It's not online learning, it's learning using online functionality. It can be extremely thorough.* (Fitness)'

Despite reforms to the way ASQA regulates there are a range of views that linger in relation to ASQA's approach to performance assessments in general, including online delivery. This can impact in a range of ways. For example, it could relate to practice that is undertaken in anticipation of what 'posture' the regulator might take. A 2022 publication, *Unpacking the quality of VET delivery* (NCVER 2021) reports findings from engaging with RTOs, includes an example of this. That report included feedback that 'it is very difficult to innovate and experiment with new delivery practices in what is seen as a tight regulatory environment'. This was based on the advice of that RTO's compliance team. One provider explained:

> We have a really digitally smart teacher who developed QR codes to support students with online assessments during COVID. But to get our compliance team to consider this as a new way of doing things was incredibly challenging because they didn't want to risk changing anything (NCVER Guthrie and Waters 2022, p.27).

The reasons why and in what circumstance a provider adopts a strict compliance posture in relation to online delivery will be multifaceted. Nonetheless, ASQA *does* support those types of innovations provided they comply with the *Standards for RTOs* and obligations as a registered training organisation (RTO).

The extent of change in perceptions towards online delivery can be measured in a range of ways. For example, a comment (italicised for emphasis) made in a past ASQA strategic review, *Training for the White Card for Australia's Construction Industry* (2013) (the White Card strategic review) about the potential for identity fraud in online learning is one such measure:

> The use of an "accredited third party" to verify the identity of the person sitting the assessment appears to provide the strongest assurance of identity *if online delivery and assessment is to continue* (ASQA 2013, vii) (italics added for emphasis).

That comment is a reminder that, not quite 10 years ago, there was no assumption that online delivery and assessment would be a feature of the VET sector going forwards. Fast forward to late 2021, and the title of ASQA's fourth webinar, *Moving and staying online* (ASQA 2021), captures a very different sentiment. We know that online delivery and assessment will be a feature of the VET sector going forwards.

1.5 The pandemic and online learning

The COVID-19 pandemic had a significant impact on the education sector worldwide. The changing nature of the pandemic and subsequent health advice required both providers and students to continually adapt to evolving modes of delivery, new teaching methods and technologies.

In Australia the need for education to shift to an online delivery model was determined by public health advice and legislation issued by the Australian State and Federal governments. Density limits and social distancing requirements positioned face-to-face learning as a potential public health risk and where possible necessitated the need to move eligible courses to online learning.

In January 2020 the World Health Organisation (WHO) declared the novel coronavirus (COVID-19) a 'public health emergency of international concern', advising countries to prepare public health measures to supress and control COVID-19 cases and contain potential outbreaks (WHO 2020). On 11 March 2020 the WHO Director-General declared COVID-19 a global pandemic, instructing countries to activate their emergency response mechanisms (WHO 2020).

To limit the spread of COVID-19, the Australian Government applied border control measures to limit the number of travellers into Australia. These border control measures were continually tightened throughout the pandemic with a complete international travel ban enacted for non-Australian citizens on 19 March 2020 (Parliament of Australia 2020).

Australia's border closures had a significant impact on the vocational and higher education sectors preventing international students from studying onshore. Where possible, providers were able to allow international students to continue their studies remotely through utilising online learning technology.

The detection of new variants of concern such as Delta and Omicron had further impacts on the international student cohort. The scheduled border opening of 1 December 2021 was delayed until 15 December 2021, to allow the government to better understand the potential health impacts of the Omicron variant.

Many of Australia's internal state borders were also closed with states and territories implementing border closures to restrict travel and minimise the spread of the virus within Australia. This led to contrasting experiences of the Australian education landscape throughout the COVID-19 pandemic. For example, education in the Northern territory was minimally disrupted while Victoria was impacted heavily with long and extended lockdowns (PWC 2020).

The online learning experience throughout the COVID-19 pandemic also highlighted the differing experiences between cohorts of students whose course content was readily able to transition to online study online and cohorts such as apprentices who were sometimes unable to progress their studies due to practical course requirements.

Workplace scenarios online: CHCCCS023 Support independence and wellbeing (Certificate III in Individual Support)

Research undertaken by Griffith University as part of this strategic review suggests enabling learners to draw on their lived work placement experiences could be facilitated online. This could include crowd-sourcing real scenarios to engage with and learn from. For example, if the focus is element 4 (support social, emotional, and psychological wellbeing), learners could be asked to contribute relevant scenarios that they have observed occurring at their work placement. They could then work in pairs or small groups to compare-and-contrast those lived experiences. This could be facilitated synchronously during a live online class, or asynchronously over a period of days. Guidance from the trainer could include identifying similarities and differences in the situation of the client/patient; in the intervention of the experienced carer that was observed; and what the learners perceive was done well and what should have been done differently.

The impact of the COVID-19 pandemic has been uneven from both a workplace perspective and online learning perspective. A report commissioned by TEQSA (2021) describes the varied experiences 'two-speed' economy and society.

> For consumers, there has been a major rise in demand for consumer technology (computers, TVs etc). For workplaces this has seen a major shift online, to working from home (WFH). For some sectors, such as knowledge workers, this has been relatively seamless, with the adoption of zoom meetings. For others, such as health treatment, there has been a hybrid adopted, such as telehealth plus more limited face-to-face consultation. But for many industries, WFH is not an option. This has included, for example, major parts of the food and retail sector, restaurants and cafes, construction and property, personal services and gyms. This is a two-speed economy and society – those able to carry on and those halted in their tracks. For higher education, COVID 19 restrictions in Australia coincided with the start of the 2020 academic year. This resulted in a sudden shift to online teaching. While largely achieved, quality was not always maintained. Nor did this mode meet the requirements of all courses (e.g. clinical courses), nor of all student cohorts. Online was also not possible for much of the research-based activity of universities, especially in the STEM fields (TEQSA 2021, pp.10-11).

The COVID-19 pandemic accelerated changes to online learning for both the vocational and tertiary sectors. While there were advances within the sector to enhance online and flexible learning opportunities prior to the COVID-19 pandemic, the requirement to rapidly move to online learning hastened these developments and provided the sector with a greater opportunity to expand both online and hybrid course offerings to provide greater course and study opportunities for both domestic and international students (TEQSA 2021).

The experience of online learning throughout the pandemic, and the rapid upskilling and investment in staff, resources, and infrastructure, can now be embedded into provider governance, staff development, training, delivery practices and review of student outcomes in a more systematic and sustainable way.

1.6 Online learning and VET sector reform

All Australian governments are committed to reforms to strengthen the training system to support Australia's immediate economic recovery. In acknowledgement of the importance of the VET workforce, reforms currently under way include development of a Blueprint for the VET Workforce to support, grow and retain a quality workforce. Work has previously included examining the quality and capability of the existing VET workforce through developing a VET Workforce Quality Strategy. The Australian Government's Department of Employment and Workplace Relations (DEWR), developed a draft VET Workforce Quality Strategy which included a focus on the importance of professional development of trainers and assessors' digital literacy skills. The Blueprint provides the opportunity to take a broader view, while still considering and incorporating feedback and proposed actions developed as part of the draft Quality Strategy. ASQA's role as national regulator will be to support the implementation of the Blueprint, including any focus on the ongoing professional development of trainers and assessors to enhance digital literacy skills, the development of high quality professional development resources in areas such as digital learning, learner engagement and teaching facilitation, recognition of prior learning, language, literacy, and numeracy (LLND) delivery, and teaching design.

1.7 ESOS and proportionate risk-based regulation

This strategic review has explored the challenges, risks and opportunities of online learning in the VET and English language sectors through a broad lens, but we note that for some Educational Services for Overseas Students (ESOS) providers, the shift online was a particularly significant change. For example, ASQA's 2021 survey of providers shift online found that nearly 30% of providers delivering to international onshore students moved to fully online and nearly 90% moved at least some training or assessment online. Providers delivering to international offshore students had over 25% move to fully online and over 80% move at least some training or assessment online. Providers of English Language Intensive Courses for Overseas Students (ELICOS) reported transitioning to fully online (31.4%) and blended (35.8%) modes of delivery.

Regulatory constraints on the shift to online were adjusted as part of ASQA's response to the COVID-19 pandemic. ASQA applied a proportionate risk-based approach which afforded temporary regulatory flexibility for fully online delivery to ESOS providers. This flexibility was applied provided that current and ongoing arrangements for students continued to maintain assessment and quality standards and were appropriately documented.

In light of the expected gradual return of international students to study in Australia, ASQA has announced that we expect that all providers will transition to compliance with the ESOS National Code by 30 June 2023, where it is safe and practical to do so.

Section 2. Findings and considerations

The VET sector showed strong resilience in response to the changes imposed by social distancing requirements during the COVID-19 pandemic. Section 2 describes the findings of ASQA's strategic review. Section 3 identifies the actions ASQA will take based on these findings.

Finding 1: COVID-19 accelerated the sector-wide expansion of online delivery and has shown that:

a) Quality VET can be delivered well online, taking into consideration the requirements of the training product, the student cohort, the skills of the trainer and assessor, and the tools and strategies for delivering online.

How providers responded to the shift online depended on a range of factors, including the:

- extent of providers' familiarity with the tools and pedagogy/andragogy of delivering online
- particular training product(s) being offered
- student cohort
- skill set of trainers and assessors.

The challenges, opportunities and risks of the shift online vary depending on the above factors. There is no single issue or feature that is an indicator of greater or lesser risk to quality.

> The delivery of online training is, and should be, influenced by the unique variables of the teaching context at hand. This means that trainers and designers should adapt the balance and nature of training delivery to factors such as: class size; the discipline being taught; the intake model (concurrent or staggered student start dates); the infrastructure available to educators and students; and student needs, expectations and learning intent (NCVER/Cox 2022, p.2).

In addition to these factors, the survey results indicated two general types of postures in response to the need to move online:

- providers that saw the moment as an opportunity to consider new ways or areas to deliver online
- providers that saw online as a temporary necessity during the pandemic, but not suitable for long term quality VET.

Providers from both 'response' categories may have had limited experience delivering online before the pandemic.

These two postures were also observed in the response from university educators who also needed to teach online due to the pandemic (Ubell 2022). Alongside this broad type of response, research found the availability of online tools was less influential on practice than the beliefs of VET providers and trainers about which teaching strategies are important or not important. These beliefs were influential, along with the knowledge of those trainers to enact those strategies with the online tools available to them (Cox 2020). This underscores the importance of beliefs or postures in how different parts of the VET sector have and will respond to online delivery.

These postures are an additional influence on views about when, and to what extent, quality VET can be delivered online. Analysis of survey responses has identified a belief among some providers that some qualifications 'cannot' be facilitated online, even though those same qualifications are being successfully facilitated online by other providers. It is possible that these postures are an influential factor in these different viewpoints. Other factors impacting on these diverse views could include the amount of time and resources available to invest in delivering training products online.

b) Many students prefer the flexibility of blended learning.

ASQA's consultations with students suggest that online learning is now central to many courses, and there are some clear benefits such as flexibility and accessibility. Most students indicated that blended learning modes work well for them, allowing flexibility and autonomy in how, when and where they study. While students identified many benefits to learning online, learning fully online is still considered a compromise by some. This is especially the case for those students that thrive in a face-to-face, social learning-based environment. It is also dependent on the content of the course. Our engagement with students and the associated findings are reported in Insights Paper 2 and the underlying research has also been published.

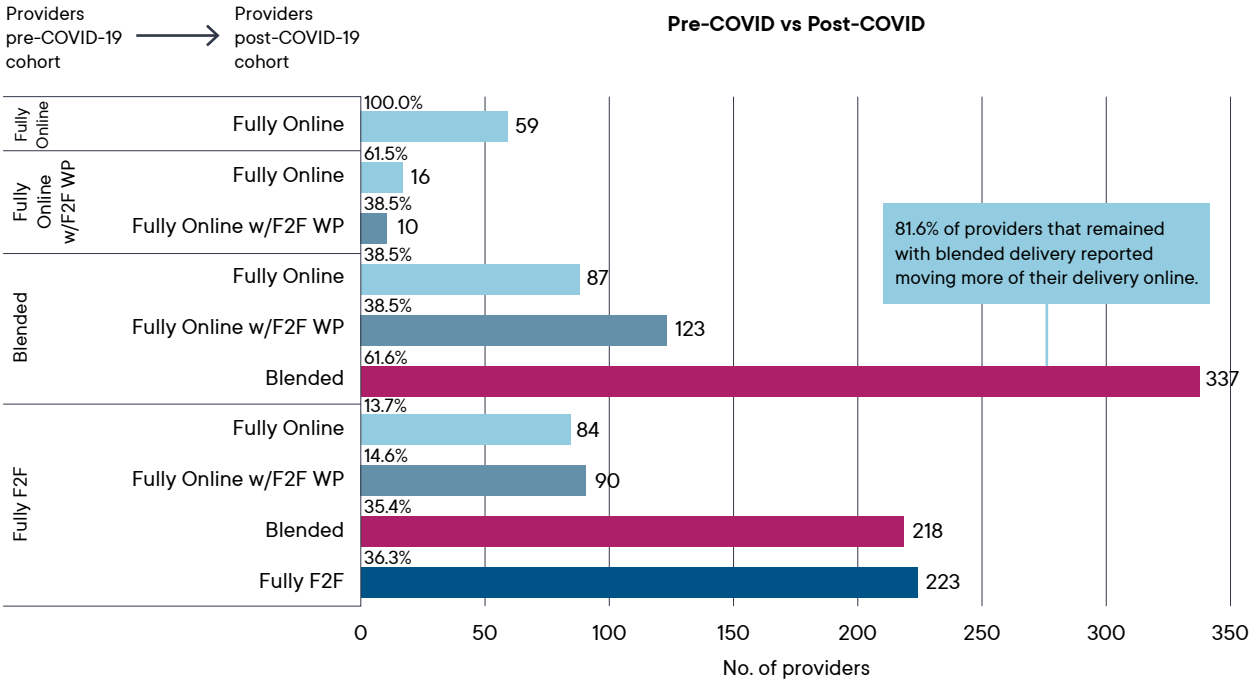
As online learning becomes an increasingly common part of VET, it is changing the nature of student choice. Some survey respondents reported that the transition to online delivery helped to bring VET to people living in rural areas, or even outside Australia. This allowed working students to access education and training at convenient times. The responses suggest that online delivery seems to have been more suitable for students who do not find traditional classroom delivery engaging. Responses also showed students in general did enjoy the flexibility and accessibility that came with the shift to online learning.

While flexibility and delivery mode have always played a role in student decision-making, students have told us those features have increased in importance since the start of the pandemic. Students are now able to make a more active choice (influenced by their own experiences) about the types of delivery mode for study. The choices available to some students, in some circumstances, has increased because of the expansion and uptake of online delivery.

As students place an increasing emphasis on flexibility and delivery mode in decision-making, they may require new or different information from providers to make the most appropriate and informed choice for their VET study.

c) The online mode of delivery brings opportunities for providers to expand their offerings and provide students with more choice across the market.

The 2021 provider survey found that most providers made significant changes to increase their use of online delivery in response to COVID-19. Many invested heavily to ensure quality delivery continued. Nearly two-thirds of providers who were not delivering any online learning pre-COVID-19, incorporated online delivery in some form in response to COVID-19. The biggest survey respondent by organisation type were private training providers (number=951), who went from 6.2% fully online (including face-to-face work placement) pre-COVID-19 to 38% post-COVID-19.



Source: ASQA-NCVER survey of providers shift online (2021)

A considerable proportion of providers (62%) who shifted their online delivery posture in response to COVID-19, indicated that they were likely to use more blended learning (a combination of digital learning and in-class, face-to-face learning) in the future. In addition, almost a quarter (22%) of providers stated they were likely to permanently shift more units/parts of qualifications online, and a further 11% were likely to permanently shift more full qualifications online. These responses indicate COVID-19 has influenced many providers to consider permanently shifting more of their training and assessment to online delivery.

The shift was significant for ESOS providers who, as a sector, were afforded the regulatory flexibility to pivot from a position of only being able to offer a small portion of training and assessment online (or none, in the case of those delivering ELICOS), to being able to temporarily offer courses fully online. Providers of English Language Intensive Courses for Overseas Students (ELICOS) reported transitioning to fully online (31.4%) and blended (35.8%) modes of delivery. Of all the survey respondents, nearly 30% of providers delivering to international onshore students moved to fully online, and nearly 90% moved to offering some training or assessment online. Providers delivering to international offshore students had over 25% move to fully online and over 80% move at least some training or assessment online.

Finding 1: Regulatory considerations

Online delivery will continue to be a common feature of the VET sector. We have found providers are in a strong position as we move to a new phase of the pandemic. They can make more informed choices about whether to continue or expand online delivery. This will include a decision about the balance of online and face-to-face learning for training, assessment, and work placements.

The expansion in online delivery and the flexibility around where and when study can be provided has had particular significance for international education. ASQA has been aware of this for some time, it is addressed in our strategic review into international education, *Protecting the quality of international VET and English language education* (ASQA 2019). We noted at the time that the 'strong demand from overseas students has seen an increase in the number of registered providers delivering VET courses to overseas students and offering English Language Intensive Courses for Overseas Students (ELICOS) or delivering training offshore' (ASQA media release 2019). We also found that the regulatory environment for VET providers delivering training and assessment to overseas students in Australia is complex. The move to online delivery due to the COVID-19 pandemic has further solidified demand.

ASQA applied a proportionate risk-based approach during COVID-19 which afforded temporary regulatory flexibility to ESOS providers delivering VET and ELICOS courses. This enabled full online delivery in certain circumstances in response to the pandemic. We note that there have been experiences and learnings from the rapid transition online during the pandemic that may be challenging to reconcile with legislative requirements for ESOS providers. ESOS providers have a higher degree of prescriptive requirements around online learning compared to VET providers. The legislative and regulatory frameworks governing the Australian international education sector have a primary focus on face-to-face delivery in Australia. The existing National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code), limits online study by international student visa holders to no more than one third of their course, and at least one face-to-face unit in each study period. ASQA has committed to work with TEQSA and consult on its current regulatory flexibility but the policy settings will need reviewing if these constraints are not to limit expansion of online options going forwards.

Perceptions of the value of online learning are shifting in response to changes in experience of online learning, for example, some survey respondents indicated the shift to online learning has given industries and regulators a better understanding of how online or blended delivery can be delivered well.

During our strategic review, some stakeholders told us they are unsure about the parameters for online learning. In response to this we designed our insights papers and feedback loop webinars to support providers navigate these challenges during the pandemic. While COVID-19 forced many providers, teachers, trainers, assessors, and students to rapidly adjust to new modes of learning, the pandemic presented an opportunity for creativity and innovation. Many respondents to the survey saw the new restrictions on their operations as an opportunity to revaluate their course delivery. This included designing training and assessment processes and any other areas with room for improvement. As the sector's maturity in online delivery develops and providers adapt their practices, we will continue to stay closely engaged, providing education and guidance activities. We will draw on other regulatory tools to address any known or emerging risks.

Survey responses provided an insight into the efficiencies and the positive benefits that stemmed from the major disruptions of the pandemic. Responses to the pandemic led to creativity and innovation in online teaching and learning development, including:

- refinement of Learning Management Systems (LMS) and online learning platforms
- updating and provision of new digital resources
- implementing fully online and blended learning
- implementing digital assessment.

Some survey respondents described strategies that involved delaying, suspending, or cancelling training and/or assessment. A common reason for this approach was that face-to-face delivery and assessment was a requirement (of training package rules or regulators – sectoral and/or industry) and that shifting any of these activities online was not allowed. Some responses suggest that providers may not have fully analysed or clarified the constraints, which potentially led to decisions that were not appropriate to the conditions. Challenges may have been overestimated and opportunities missed.

Clustering is an approach taken up by some providers in response to the COVID-19 pandemic. 'Clustering' of units for delivery and assessment (Clayton et al. 2015) is an established practice described in many companion volumes (for example SkillsIQ 2020). Rather than delivering units in linear sequence, providers delivered similar and complementary learning from different units concurrently. Evidence shows another practice that was adopted was 'stretching' units. When stretching units, providers allow some elements to remain incomplete until logistically convenient (stretching). The concept of stretching means that incomplete units do not necessarily stall overall progress. All the training and assessment elements that require simulated or actual workplace experience are held over until attendance is feasible. Meanwhile, training and assessment that can be facilitated online continues.

It is unclear whether clustering practices expanded because providers were innovating or because they were increasing their level of online activity which worked well for clustering. An NCVER report (2022) noted that the practice of changing the sequence of curriculum and bringing forward the theory components presented challenges for trainers when face-to-face teaching resumed. They found students struggled to remember the content taught earlier online. Some providers the authors engaged with described that they 'had to reteach the theory components in full when practical training and assessment resumed, which placed additional pressure on trainers to ensure students were still able to complete their training on time' (NCVER 2022, p.20).

VET is associated with practical skill learning and assessment, and that focus is important for many industries. Practical training and assessment often involve working with physical materials and equipment, as well as interacting with people in service roles. This kind of training and assessment can be difficult to untangle from in-person learning. The design of online delivery should take this into account, as well as the student cohort, training product, industry and employer needs, and trainer and assessors' capabilities.

Online learning covers a wide range of tools, technologies and processes. These range from relatively low-tech and widespread tools such as email, to high-tech tools like virtual or augmented reality. This makes it difficult to have a common or shared understanding of what online learning and delivery is. Building an understanding of these 3 areas – tools, technologies, and processes – and emphasising there is no 'one-size-fits all' approach, may help providers to better consider their own online offerings. Understanding the range (and combination) of approaches available may prompt ideas and identify opportunities for improvement. Providers need to make decisions about the best type of online learning for their organisation, trainers, assessors, and students.

From a regulatory perspective, ASQA will enhance guidance material and processes for our assessment of online delivery. Developing consistent and accepted models for online learning, along with consistent language and assessment processes, will support continuous improvement and self-assurance in online learning in the VET sector.

Finding 2: As a result of the COVID-19 pandemic, there was a rapid shift online by many providers with no or limited experience in that mode of delivery. This means some providers have limited experience in self-assurance for online or blended delivery.

a) Where there is limited experience in online delivery, there are a number of risks for students.

Risks of not ensuring students are appropriately prepared for, and supported to, undertake learning online, and not sufficiently taking into account the student's literacy, language, numeracy and digital (LLND) skills.

A key insight from our consultations was that the experience and support needs for VET students varied when they transitioned to online learning. Research by Community Colleges of Australia (CCA) (2021) found the shift to online learning during the COVID-19 pandemic did 'bring into sharp relief the gap – socioeconomically and geographically between those who had both access and the capacity to use online technologies'.

There is some evidence from ASQA's consultations, and other research (TEQSA 2020) that indicates the negative experiences for students transitioning to online learning may stem from the absence of social interactions. Rather than issues with online delivery per se, students may have difficulty adjusting to the loss of time on campus or in class. This underscores the importance of ensuring the digital literacy and learning styles of prospective students are suitable for the proposed mode of delivery. Strategies need to be in place to support and evaluate students learning online and to develop appropriate interactions for learning and peer group socialisation online.

Through analysis of regulatory data this review identified examples of potential risks to student engagement when training is delivered asynchronously online. In one example, a provider's capacity to offer students engagement with teaching and learning staff was reduced due to an increase in the student to trainer ratio. In situations like this, it may be technically possible to enrol more students, however, trainers are still required to provide engagement opportunities to students. Some performance assessment reports found providers delivering asynchronously online exceeded their specified student to trainer ratios and did not fully address the impact on students. In another example, a student was undertaking a Certificate IV in Training and Assessment that was entirely self-paced. The student had been given access to recorded webinars only. When asked if they had been provided with sufficient information and time to do assessments, the student described feeling 'completely lost'. They said 'I know there are 11 assessments to be submitted and I am expected to submit them all at the same time in a zipped folder but, it's too much. I have 8 assessment tasks ready to submit but I don't know what to do next and when I reach out for help, I'm ignored'. Examples of the lack of support included:

- unanswered questions posted on the hub
- removal of forum questions that questioned training methods
- lengthy waits for one-on-one support, with a wait time of over 2 weeks for phone calls with a trainer
- no-shows by the trainer at pre-booked phone call sessions
- trainers returning calls that, if not answered immediately, required re-booking and starting at the back of the call queue.

While online learning can create greater opportunities for engagement for some students, such as those in remote locations, research and stakeholders have told us it can lead to disengagement. In the higher education sector, TEQSA found some students worked off-camera to avoid showing home interiors, unsatisfactory study spaces or busy, distracting home environments. (TEQSA 2020, p.13). These pressures were less common, or entirely absent, in the larger more elite institutions (TEQSA 2020, p.14). This suggests that students from lower socio-economic backgrounds may be more vulnerable to certain factors that contribute to disengagement.

However, in certain circumstances, online learning can be empowering for some lower socio-economic students:

> ...platforms whereby students participate in a conversation that isn't conducted in real time can unlock a range of possibilities that are unique to learning online. These include enabling students to think through their responses before sharing them. Furthermore, peer contributions can be viewed without any bias toward gender, race, or physical appearance' (NCVER 2022, p.3).

Pre-recorded video and role play: CHCCCS023 Support independence and wellbeing (Certificate III in Individual Support)

Research undertaken by Griffith University as part of this strategic review suggests pre-recorded video content is one medium through which real-world or realistic scenarios can be engaged with by learners individually or in groups. For example, for element 4.1, during a live online class learners can be shown a video where indicators of note are present in the behaviour and speech of a client/patient. Learners are asked to contribute ideas and jointly develop a plan for that client/patient. They then role play different approaches to having that conversation with the client/patient, with the trainer guiding learners through language, tone, body language, and so on. Another example, for 2.3 and 2.4, is where a video could be shown of a person struggling with a situation that is exacerbated by their being unable to access appropriate support services. From that trigger event, learners could be asked to 'rewrite the ending'. That is, to actively go online and seek out what support services and resources are relevant to the situation/s being presented, and then write or role play introducing those services to the client/patient.

- **Risks of not taking into account the student's learning style.**

During COVID-19 students reported that they needed continuous communication and support — regardless of the approach of providers (whether they paused, pivoted or adapted). The desire for clear and direct ongoing communication remained, even if the provider was unsure how to respond to the pandemic.

Examples of good communication practices included regular one-on-one check-ins with students, such as an individual monthly phone call. One suggestion was to increase monitoring of student progress through attendance and assessments, to identify those having difficulty, then engaging with them to offer extra support. Some students commented on a lack of connection with peers and teachers in an online setting. Those who had regular check-ins with their teachers reported greater motivation and engagement.

Learning styles are important to consider regardless of the mode of delivery, however student consultations suggest online learning is experienced differently to in person, face-to-face study. Considerations such as screen fatigue, and the need to be skilled in a range of online tools and programs should be addressed for online learning.

Online Interactive Activities (OIA) – increasing learner engagement

Tools for polling students are one example of Online Interactive Activities (OIA). They are sometimes called Audience Response Tools, or Online Polling Tools, these tools are web-based platforms with an online interface (app/webpage). In a conference paper, Chen et al. (2021) describe the functionality of these tools as part of a discussion on the experiences of large-scale implementation of OIA undertaken by a higher education provider, Victoria University. The authors describe how polling tools ask students (or audience members) to vote for answers to questions, with those answers being turned into a visual representation such as charts or images. Popular examples listed include Socrative, Poll Everywhere, Kahoot and Mentimeter. These tools are based on a form of gamified learning, where learning activities incorporate game-like features. The authors identify several studies that report on the benefits of these tools for student learning: 'These activities have been found to increase students in-class engagement, participation, tendency to express views, and comfort at doing so, leading to improvement in overall learning experience' (Chen et al. 2021, p.89). They describe how interactive activities (OIA), particularly interactive polling tools, can be useful for engaging learners such as those training in an environment where the language used (e.g. English) is not a learner's first language. Such activities can support a provider to enable a learner to meet the requirements of each unit of competency or module they are enrolled in (Clause 1.1).

- **Risks of not being equipped to meet the delivery mode's technological requirements for participation.**

Survey analysis found some of the challenges faced by students related to digital technology. Respondents described situations where students had restricted access to technology. This included equipment being shared among family members or old systems that were not able to accommodate applications used by the provider. Some students reported they did not have the learning resources (computers or programs) to participate, or the information technology skills required. This impacted on their ability to participate in group learning.

During the initial shift online, TEQSA found 'IT issues were reported with the greatest frequency of any of the concerns canvassed by the surveys conducted by the providers'.

> 'The matters causing difficulty range from access to adequate computing equipment, to having to learn new software and collaboration techniques associated with Zoom or its equivalents, to slow internet speeds at home compared with what would be available on campus in face-to-face experiences. Some students complained about audio quality of the lectures and tutorials and having difficulty with the quality and age of some of the lecture recordings' (TEQSA 2020, p.12.).

- **Risks of a student not being informed of, or sufficiently understanding, the mode of delivery being offered.**

Regulatory data recorded at least one example of a provider shifting delivery of their Certificate IV in Human Resources to fully online due to COVID-19, without informing students of the change. As the options available for mode of delivery diversify and training products adapt, the importance of clear and frequent communication about adjustments providers make will become increasingly important.

Finding 2a: Regulatory considerations

To successfully engage with online or blended learning students, and trainers and assessors, require digital literacy skills. Joyce (2019) acknowledges the importance of digital literacy skills, noting that 'In our increasingly computerised world, digital skills will be critical for the vast majority of workers' (p.8). The inclusion of digital skills alongside the foundation skills of language, literacy and numeracy (LLND) recognises that digital literacy has become increasingly critical for individuals' participation in the workforce.

The Department of Employment and Workplace Relations Digital Literacy Skills Framework (2020) gives clear direction on digital literacy requirements for a potential student. Providers should ensure that they are correctly assessing students for entry into their courses, taking into account the match between student readiness for online learning, their access to the appropriate resources, and the delivery mode chosen by the provider. Like other language, literacy, numeracy and digital (LLND) assessments, it is necessary to work out if any gaps can be resolved with little to no financial or time cost to students.

To deliver training online, providers should ensure that there are sufficient educational and support services to meet the needs of the learner cohort/s, sufficient learning resources regardless of mode of delivery, and sufficient facilities and equipment (Standard 1).

The shift to online learning and this change to market offerings means students may now require new or different information from providers so they can make the most appropriate and informed choice about what, where and how to study VET. Providers need to ensure students are given comprehensive and up-to-date information. This includes information about access to any digital tools or technology that is required.

Standard 5 (clauses 5.1 and 5.2) focuses on the student's enrolment experience with their RTO and emphasises the provider's responsibility for informing and protecting their students. It is important for providers to be transparent about the training delivery to prospective and current students. This includes marketing and recruitment materials, such as the organisation's website and brochures. It also includes any information provided to students at information, orientation and enrolment sessions.

Standard 4 (clause 4.1) focuses on the student's experience of marketing and recruitment. Providers are required to provide accurate and accessible information to prospective and current students. As providers improve their digital capability and offer a larger range of subjects online or in blended modes, learners may be able to increasingly consider their preferred way to study – fully online, fully face-to-face, or a blended option.

b) Where there is limited experience in online delivery, there are risks for providers, trainers and assessors.

- **Risks associated with insufficient digital literacy skills of trainers and assessors and access to digital tools and platforms.**

The efforts of teachers and providers in adjusting to a rapidly changing situation in response to COVID-19 must be acknowledged. However, students commonly reported that some teachers had a limited understanding of digital platforms and technological skills. TEQSA's research found that higher education providers in Australia also showed low engagement with more complex information technology tools, other than Zoom or its equivalent (TEQSA 2020).

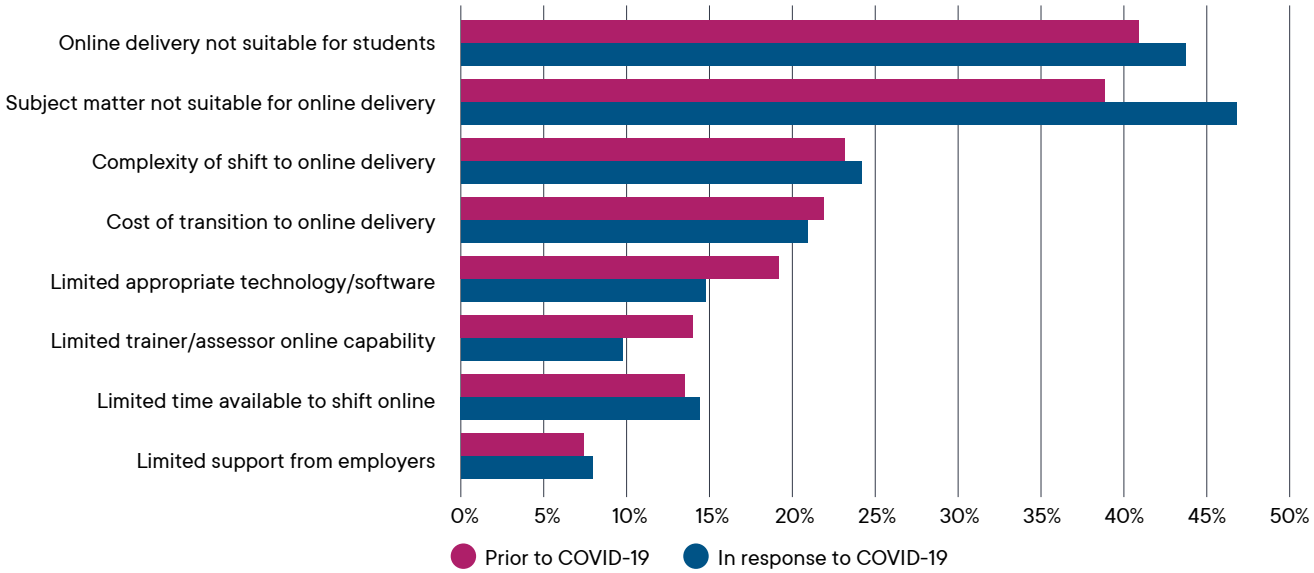
Our survey results appear to suggest that pre-COVID-19 and in response to COVID-19, providers focused on technology that delivers 'web-supported' online learning, such as Learning Management Systems (LMS). There was less focus on digital tools for interactive online learning, such as quiz tools (17%), virtual or augmented reality (VR/AR) tools (4%), or artificial intelligence/machine learning (AI/ML) tools (2%). A research report by NCVER (2022) drawing on the same survey and some follow-up interviews, similarly found that 'Some trainers … had limited or no experience in using the digital platforms that were acquired, upgraded or expanded to support the online delivery of training. The surveyed RTOs reported training on specific software (that is, meeting platforms and learning management systems) as the most common type of training provided to trainers, at 83.5%' (2022, p.19)'.

The survey results suggested some marginal differences in the use of technology across providers of differing sizes before COVID-19. Large providers were slightly more likely to be using a Learning Management System (LMS) and a wider range of technologies than smaller providers. This may be explained by larger providers having access to more financial resources. Given the availability of inexpensive software such as Moodle, it may also indicate limited awareness and/or expertise in developing custom content. Irrespective of provider size, meeting platforms were the type of technology most likely to be acquired or upgraded by providers in response to COVID-19. This suggests meeting platforms were a minimum requirement for providers to continue operating during COVID-19. While the focus on LMS technology early in the COVID-19 pandemic is clear, it is also to be expected that these practices have continued to evolve and mature since then.

- **Risks that training and assessment is not suitable and/or is not being delivered effectively online.**

Around half of providers delivered training and assessment fully face-to-face before COVID-19. For those not delivering face-to-face, their reasons for not delivering online pre-COVID-19 were the same reasons given by providers who did not move online in response to COVID-19, as shown in Figure 2.

Figure 2. Main reasons for not delivering online pre COVID-19 and Post COVID-19



Source: ASQA 2021

The main reasons given by providers for not offering online delivery (before or during the pandemic) was the view that online delivery is not suitable for students, or the subject matter was not suitable for online delivery. Responses were similar across all provider sizes (by student numbers). One notable finding was that the reason 'Complexity of shift to online delivery' increased as the provider size increased.

- **Risks that training and assessment has not been designed or adapted for online delivery.**

Provider's responses to the survey showed that moving learning activities online required careful consideration and review. Some respondents developed completely new resources and added them to current delivery activities (producing blended offerings) or to translated activities.

> 'We have used this period to commence updating and re-writing current course content and add additional courses to our scope and catalogue.'

A set of survey respondents described far-reaching changes that involved redesigning courses from the ground up, to fully leverage digital delivery technologies and applications. Often, provider reviews of existing systems, methods and resources pointed to the need for fundamental re-design, and respondents commented on the commitment (and investment) required to follow up.

Some survey respondents described barriers to developing and implementing quality online courses. These included the pressure of time constraints due to the rapid shift to online delivery, and a lack of time to sufficiently develop and implement online teaching and learning without diminishing quality. One respondent reported that 'An appropriately developed and delivered online course should be as robust (or more so) than F2F [face-to-face]. However, a rushed transition to online meant that quality was often playing catch up'.

One of the key considerations for delivering online is whether training is synchronous (live) or asynchronous (self-paced). These different environments affect the design of tasks and activities that demonstrate performance and knowledge evidence. Research by NCVER (2022) highlights:

> 'It is important to consider drawing on the benefits of both real time and non-real time delivery approaches. Real time engagement can support in-the-moment questions to be addressed; challenges to be navigated; and spontaneous and rich learning conversations. Engagement with learning content that happens in non-real time can support students to: engage when convenient; slow down, speed up, and repeat elements; and ponder and assimilate knowledge before moving forward. Importantly, rich learning conversations are not limited only to real time or live online opportunities and can be readily facilitated through other platforms, such as discussion boards and chat spaces' (NCVER 2022, p.2).

Each approach, or a combination of approaches, has value for types of learning.

- **Risks that online delivery does not meet the requirements of the training product.**

Survey results indicate that face-to-face work placements were less able to move online compared to other aspects of the delivery of VET. The practice of manual or interpersonal skills and practical demonstrations for formative or summative assessment are a common requirement of training packages. This created a special range of challenges for providers. Providers reported in early 2021 that they were designing the sequencing delivery of theoretical components of courses before practical work placements or assessments in response to social distancing requirements. Where training included mandatory work placements and practical assessments, some providers were unable to support completion. In some cases, learners were able to complete theory elements online, but practical assessments were delayed and resumed later.

The variety of experiences across jurisdictions and industries makes it difficult to accurately determine and assess where training or work placements were not able to be completed and what the impact has been. We do not have enough data to understand what the continued impacts of these delays between theoretical and practical study have been. It is possible that some students have been unable to complete practical assessments and mandatory work placements as originally intended or only after significant delays. While these are challenges that relate to the experiences of training and assessment during lockdowns, they are of interest for the ways in which they highlight that some training products cannot be delivered online.

- **Risk of insufficient checks and balances in place to assess a learner's competency or verify the authenticity of the learner.**

Before COVID-19, and in the early transition online during the pandemic, a common key concern conveyed by stakeholders was in relation to validating assessments when delivered online. For example, ASQA's White Card strategic review found that the majority of White Cards (95%) were being delivered through an online environment. While the majority of training providers assessed were compliant with most of the training and assessment standards, the majority were not compliant with the standard relating to assessment practices (ASQA 2013, p.43).

Concerns about assessment and online delivery models have been reported on by other stakeholders more recently, for example, NCVER 2019 (p.52):

> 'The authenticity of online e-assessment is a concern shared by many stakeholders in the VET system and was examined in an enquiry commissioned by the Flexible Learning Advisory Group (Morris 2014). The enquiry found that the validity, sufficiency and authenticity of evidence (including plagiarism, inappropriate collaboration, cheating and identity fraud) was one of the primary areas of concern for employers, auditors, assessors and students'.

Third party assessment: CHCCCS023 Support independence and wellbeing (Certificate III in Individual Support)

Research undertaken by Griffith University as part of this strategic review suggests when considering moving online, it is possible that this unit could leverage the accepted practice of assessors liaising closely with workplace supervisors to plan and oversee assessment tasks occurring within normal work activities. In some scenarios the assessor does not physically need to be present for all tasks, such as where it is impractical for them to do so. Situations will arise organically and unpredictably within the work placement, and the learner and their supervisor can then review and record the leaners performance as it occurs or immediately after a relevant occurrence. Evidence can be captured such as patient records and other documentation, although these must be de-identified to prioritise client/patient confidentiality. Evidence for some elements can be observed by the assessor via video recording or a live-streamed video call. However, patient confidentiality is a limiting factor. It is also possible in some circumstances for the client/patient to be interviewed about their experience of being cared for by the learner under assessment.

The regulatory data explored as part of this strategic review (Appendix 1) suggests there are multiple variables that may be exploited to make it easier for some students to complete assessments without the appropriate competencies. For instance, having poorly designed assessment practices can make it easier for students to 'guess their way through assessment' without having absorbed the knowledge and skills. Without a robust system to verify the authenticity of the student's identity and actions during assessment, trainers and assessors may not be assured that the evidence presented is the student's own work. The ability to control and monitor the online environment ensures appropriate assessment conditions.

Some ASQA stakeholders have raised concerns about third party vendors known as Subscription Service Providers (SSP), marketing academic cheating services to students in the VET sector. The concern was particularly about training products where demonstrated competency is less likely to involve observed practice.

The link between assessment and risks or challenges in online delivery was a concern raised during stakeholder consultations and research for this strategic review. Qualitative responses to the survey found that academic integrity and authenticity was a focus for providers who were unable to vouch for the effectiveness and reach of delivery or the veracity of assessment evidence gathered digitally:

> I feel risks are more associated with assessment eg. [sic] validity (not collecting adequate performance evidence through demonstration), authenticity (the learner has to make a declaration that it is their own work, however, RTOs need to be very alert to plagiarism and adequate validity to support authenticity), volume of learning (learners rushing training/assessment due to the flexibility online learning affords).

However, assessment was raised as one of several concerns by providers, but not the only one. This may be because the review has not been focused on a particular unit of competency or stand-alone qualification like the White Card. It could also reflect that the sector was focused on other more pressing issues as they navigated the challenges of the COVID-19 pandemic.

At the same time, the way the VET sector thinks of assessment, as part of a broader shift to focus on quality, may have evolved in recent years (NCVER 2022). This may be a factor in why assessment was not a strong concern in this review. As part of this shift, providers, and others, including ASQA, are using the term 'delivery' to:

> '...encapsulate all the activities involved in producing high-quality learning experiences and outcomes for students; that is not only the more visible teaching, learning and assessment practices, but also the wraparound administrative and support services that enable students to engage fully in learning. We also use this term to challenge VET's preoccupation with assessment, which, while important, does not stand apart from the processes of teaching, training and learning or from program and resource design. We note this shift in ASQA's approach to quality in VET as well' (NCVER 2022, p.13).

An evolving view of VET quality and self-assurance may have influenced the tone of feedback during this strategic review on the topic of online assessment. Some survey responses included examples of how quality assurance and management was a distinct focus. The main topics in quality assurance included workforce expansion, teaching quality measures, and gathering feedback from users or formal evaluation of provision.

Some providers hired new employees to ensure that quality was not compromised in the move to online delivery. Evaluation and performance review processes were instigated by some providers. This included surveys and interviews of teacher/trainers, students and other stakeholders to provide insight into the effectiveness of new systems, applications, and delivery and assessment approaches. Hiring extra staff was often part of a strategy to monitor the evolution of practices. Student engagement and completion rates became crucial indicators of the effectiveness of changes. These and other examples are discussed further in Appendix 2.

Finding 2b: Regulatory considerations

ASQA recognises the risk posed by contract cheating services on student outcomes and the integrity of qualifications. We are taking a multipronged approach across our regulatory operations to raise awareness, monitor and deter use of these services. We are providing stakeholder information about the risk of academic cheating, to support providers to monitor, evaluate and continually improve their training outcomes and performance. In the ASQA February 2022 Update, we highlighted this risk across the sector and encouraged providers to address this risk. We are also engaging with TEQSA to find out how education resources developed by its Higher Education Integrity Unit (HEIU) could be applied in the VET sector.

Delivering online is different to delivering face-to-face. A course must provide guidance on appropriate delivery modes, together with advice on limitations on course delivery modes and any requirements for work placements or on-the-job training (Standard 10.13 – delivery modes, *Standards for VET accredited courses*). Consideration should be given to the skills and knowledge needed to conduct assessment online. The new draft elective unit of competency in the Certificate IV in Training and Assessment (TAE40116), TAEASS404 (assess competence in an online environment), provides clear information about some of these differences. This includes:

- knowledge of cyber security risks when planning online assessment
- strategies and processes for identifying and organising specialist support for learners including relating to technical needs (software and hardware)
- factors affecting tool use in online assessment and capability of interactive mediums such as video, virtual reality and audio
- training product requirements, including assessment requirements applicable to online assessments described in the performance evidence' (TAEASS404).

The COVID-19 pandemic has driven a new level of maturity in the VET sector in relation to online delivery. However, developing and embedding new skills across the VET sector will be an ongoing shift. For many there will be limited experience of online delivery, and when combined with the rapid pace of change in technological developments and pedagogy, it is clear there is a need for ongoing engagement and training. The development of a Blueprint for the VET Workforce will help to support, grow and retain a quality workforce. Digital literacy skills for both trainers and students are important areas of future focus for ensuring quality online VET.

Finding 3: The broad range of practices captured in the online delivery mode, and its rapid evolution, have contributed to a definition of online learning that is no longer fit for purpose. This can impact on the collection of accurate and meaningful data on sector activity and performance, and the marketing of accurate and consistent information about mode of delivery to prospective and current students.

Research suggests that where, when and in what way online practices have been adopted has carried with it an element of pragmatism that is part and parcel of a competency-based system. This pragmatism is strongly informed by the focus on hands-on, or practical, training in the VET sector that often includes some components of non-online practice (NCVER 2019). This is noted because while some stakeholders have indicated that there would be benefit in further defining exactly what online learning encompasses, some have recognised that definitions may stifle innovation, focusing on defining inputs rather than student outcomes. This complexity has been considered in the background research and evidence used to develop Finding 3.

Identifying which VET qualifications are fully or partially online is currently difficult, due to the way data is collected and coded, and how courses are promoted and delivered by providers (NCVER 2019). As noted in the same report (NCVER 2019, p.19), the delivery mode identifier for VET data collected under the Australian Vocational Education and Training Management Statistical Standard (AVETMISS) can be used to identify training that is delivered (at a subject level, not a qualification level) in more than one mode, such as a mix of classroom-based and external delivery.

The current attributes of the mode of delivery described in the AVETMISSS data element definitions are no longer fit for purpose. The delivery mode identifier 'identifies whether or not a subject comprises internal, external or workplace-based delivery – or a combination of these modes'. Read the full current attributes from the report (2016 p.68). The internal and external delivery definitions are:

> **Internal delivery e.g. classroom-based** … is where the client and the trainer interact in real-time and physically attend training delivery locations organised or managed by the training organisation. This includes workshop, laboratory, simulator and classroom-based training even when the training is delivered using video or internet links in real time. The client and trainer must interact in real-time and must attend a training delivery location to be classified as internal.
>
> **External delivery e.g. online** … is where the client does not attend a physical delivery location but instead undertakes training at a location of their choosing and using training materials that are provided online or by correspondence. A client learning at home either by engaging with self-paced materials or interacting with a trainer in real-time would be classified as external (AVETMISS data element 2016, p.68).

At a minimum, the use of 'external' and 'internal' to describe modes of delivery no longer resonate with contemporary understanding of online learning and delivery. With the acceleration and maturity of online delivery due to the COVID-19 pandemic, we believe there is a strong case for updating the AVETMISS standards to reflect this.

The structure of 2 recently released units of competency that were added as electives to the existing qualification TAE40116 Certificate IV in Training and Assessment, provide examples of contemporary directions in terminology. The units are TAEDEL405 *Plan, organise and facilitate online learning* and TAEASS404 *Assess competence in an online environment*.

In these units, online learning is adopted as the key term in each unit of competency (not e-learning, for example). Terms denoting physical locations such as 'classroom based' are not used. Instead, the performance and knowledge evidence in each unit refers to tasks and activities in either a synchronous and asynchronous environment.

Finding 3: Regulatory considerations

In some circumstances, specific modes of delivery may be essential to achieving the course outcomes. For example, delivery may need to take place in a simulated environment. If this is the case, providers should identify any limitations to delivery under 'Delivery Modes' in the course document. This should include justification for any limitations, based on regulatory requirements and/or feedback from key stakeholders. Details of any requirements for on-the-job training should also be included. Where a course includes imported units of competency from a training package, that package or its implementation guide may include advice regarding specific delivery requirements. If the course includes imported units of competency from another VET accredited course, that course will include advice regarding specific delivery requirements.

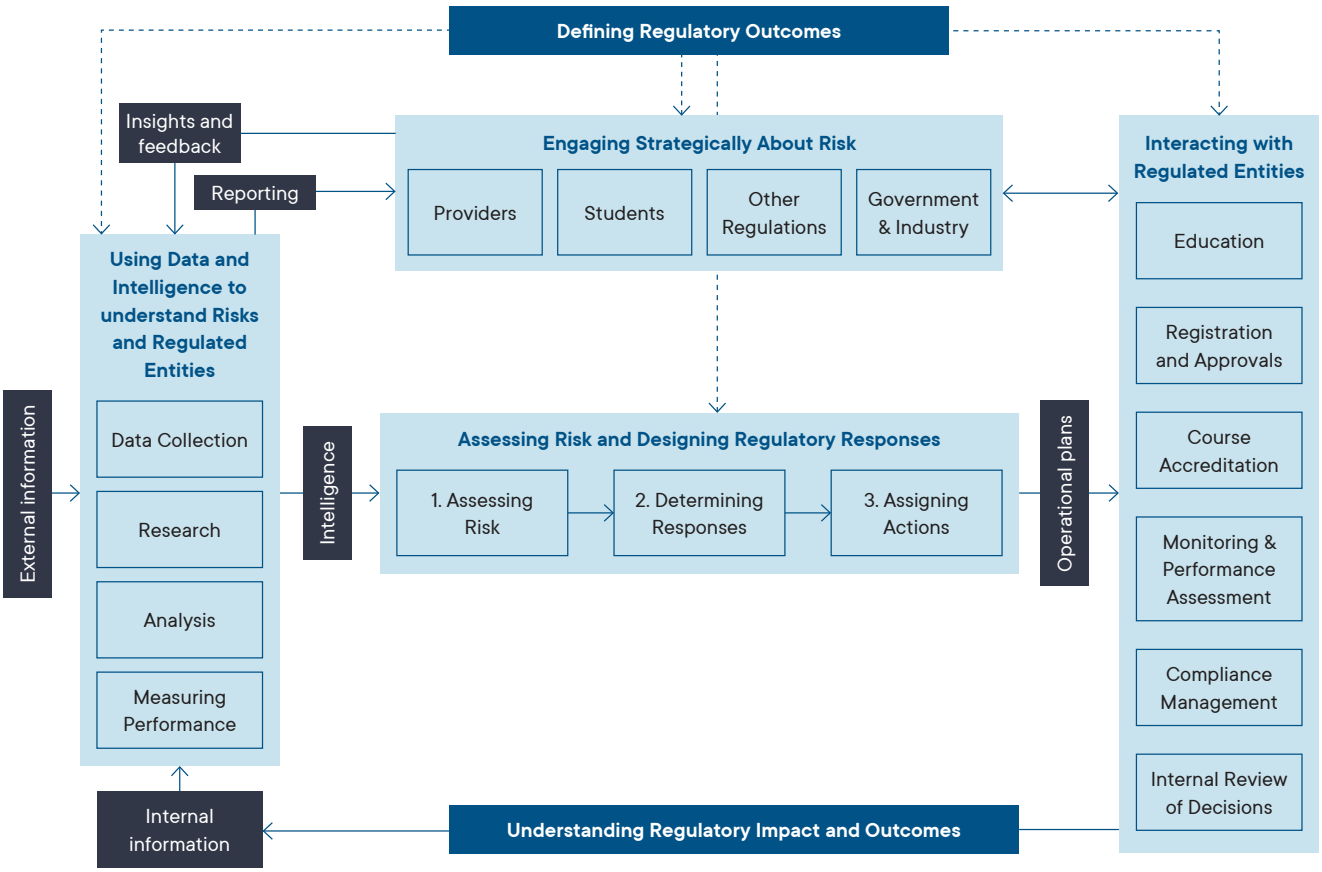
Some stakeholders have expressed a view that it would be beneficial to update what 'online learning' encompasses, while recognising that definitions may stifle innovation by focusing on defining inputs rather than student outcomes. Given the rapid changes and expansion of online delivery and confusion about what is or is not permissible in this mode of delivery, this requires more guidance, without being overly prescriptive. The range and combination of delivery modes could then be more clearly conveyed to prospective students. Greater consistency could also provide clarity for VET providers who are marketing online modes of delivery to prospective students. It would also support continued consistency in assessment of providers by VET regulators.

As part of the national Skills Reform, ASQA is providing input into the VET Data Streaming (VDS) initiative. The VDS is a significant, multi-jurisdiction project that will modernise the way training activity data is managed across the VET sector. Through the application of modern digital technology, VDS will increase the availability, timeliness and relevance of VET data for all users. The Department of Employment and Workplace Relations is conducting ongoing consultations as part of this initiative, to better understand what VET Data Streamlining means for the sector. This will include a new information standard that is proposed to replace the current Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS), VET Provider 8.0 Collection. This will include improvements to how mode of delivery is captured and reported on.

Section 3. Actions and policy considerations

The actions draw on ASQA's Regulatory Operating Model (Figure 3) to ensure we achieve our strategic objective and manage risks to maintain confidence in the integrity of national qualifications issued by training providers. This includes effective use of data, communication and engagement to raise awareness and provide clear feedback and support for providers to self-assure and full use of a range of regulatory tools in responding to non-compliance (Regulatory Risk Framework 2021, p.8).

Figure 3. ASQA's Regulatory Operating Model



Source: Regulatory Risk Framework (ASQA 2021, p.7)

Regulation

The review identified the following provider accountabilities and relevant clauses of the Standards for regulatory focus and assurance of quality outcomes:

- giving accurate and accessible information about mode/s of delivery to prospective students, particularly, that the information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and accurately represents the services it provides (Standard 4.1 (a)) in relation to blended learning or learning fully online
- ensuring that all trainers undertake professional development in the fields of knowledge and practice of vocational training, learning and assessment (where appropriate, taking account of the digital literacy skills of trainers and assessors) (Clause 1.16) and support RTOs to self-assure their practice in complying with this standard
- ensuring each learner is properly informed and protected when considering and undertaking blended learning or learning fully online (Clause 1.2, 1.3, 5.1 and 5.2), including, where appropriate, the suitability of any proposed use of asynchronous (self-paced) learning.

ASQA has committed to five actions as a planned program of work to address risk, and support providers to self-assure against the required Standards and to continuously improve the quality of VET delivered online including through provider education and ongoing proportionate monitoring of the risks of online delivery. These actions support ASQA's purpose to ensure quality VET through our regulation and partnership with others, so that students, employers, the community and governments have confidence in the integrity of national qualifications issued by training providers.

ASQA has also identified important policy considerations to be raised through our engagement with the Department of Education and Department of Employment and Workplace Relations.

Actions arising from the review

Examination of identified risks and key clauses of the Standards will inform ASQA's regulatory approach and support quality outcomes through the following actions.

Action 1.

Through our integrated, planned and risk -based approach to regulation ASQA will undertake performance monitoring of a sample of providers delivering products of concern online, including a focus on specific provider responsibilities under the Standards. We will report on the outcomes of these regulatory activities including sharing insights with the sector.

Action 2.

ASQA will strengthen existing education products and develop new guidance to support providers to self-assure their operations and continuously improve performance against the Standards in the context of risks of online delivery. ASQA will test these products with stakeholders to ensure they're fit for purpose and deliver on intended outcomes

Action 3.

ASQA will develop guidance for its quality assessors to support consistent application of the Standards and ensure assessment practices keep pace with innovation in relation to online delivery.

Action 4.

Ordinarily, English language qualifications delivered under the ESOS Act cannot be delivered fully online, because of the importance of cultural immersion in achieving the learning outcomes. Explicit allowance for fully online delivery of these qualifications was made by ASQA and TEQSA as a temporary measure in response to COVID. Support for ELICOS providers and a planned approach to return to compliance with the ELICOS Standards should be considered in consultation with stakeholders.

Action 5.

ASQA will consider the risks associated with delivering online learning and the self-assurance systems in place to assure quality outcomes for online or blended delivery when considering the overall level of risk for an applicant or registered provider, and the broad range of regulatory approaches to respond to the relevant risks identified.

Consistent with ASQA's Regulatory Operating Model (ASQA 2021, p.9), these actions will involve actively engaging with stakeholders and the regulated community to work collaboratively to enhance quality VET delivered online.

Policy considerations

Policy consideration 1.

ESOS Agencies should monitor the data sources available to understand achievement of learning outcomes, student support and wellbeing required of ELICOS providers. This will provide greater assurance of market maturity and inform any future policy settings.

Policy consideration 2.

The Department of Education to consider ways in which the outcomes intended by requirements set out in Standard 8 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code) and the ELICOS Standards can be safeguarded whilst not constraining expansion of vocational training by ELICOS providers.

Policy consideration 3.

In developing policy in relation to the applicable Standards, Department of Employment and Workplace Relations should consider provider responsibilities including trainers and assessors having the appropriate capability to conduct training and assessment online; ensuring the authenticity of online assessment; and appropriate training and wellbeing supports for students studying online. The review of Standards for Registered Training Organisations currently under development by the DEWR is an opportunity to support quality assurance of training and assessment delivered online.

Policy consideration 4.

The current review of the Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS) led by the National Centre for Vocational Education Research (NCVER) could provide improved data and definitions to capture the diversity and characteristics of the online market. This would assist ASQA to better target our regulatory activities to address risk and support providers to deliver quality training and assessment online. The availability of up-to-date information on public websites linked to the AVETMISS data, namely My Skills and training.gov.au, is also critical for students, funding authorities and employers to make informed choices about training.

Glossary

This is a short list of terms referred to in the report. For a more detailed list, please view the *Glossary* on ASQA's website.

Andragogy –The method and practice of teaching adult learners; adult education.

Asynchronous – Self-paced training.

Clustering – Clustering groups of units together for joint delivery and assessment.

English Services for Overseas Students (ESOS) providers – Providers who provide education services for overseas students.

Heads of Agreement for Skills Reform – an agreement between the state and territory governments and the Australian Government that sets out reforms to improve the VET sector, and an approach and priorities for developing a new National Skills Agreement to replace the National Agreement on Skills and Workforce Development. It was signed by all states and territories in 2020.

NCVER – National Centre for Vocational Education Research

Pedagogy – The method and practice of teaching, especially as an academic subject or theoretical concept.

Posture – A particular approach or attitude.

Provider – the term 'provider' is used throughout the report to refer to all types of registered VET providers. This may refer to a registered training organisation (RTO), an RTO that is also registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) to deliver to overseas students, or an organisation that is registered on CRICOS and delivers English Language Intensive Courses for Overseas Students (ELICOS).

Registered training organisation (RTO) – a training organisation listed on the National Register, training.gov.au, as a registered training organisation. Also known as a provider.

Standards for Registered Training Organisations (RTOs) 2015 – the Standards set out the requirements that an organisation must meet in order to be a registered VET provider. The Standards ensure training products delivered by registered providers meet all the requirements of training packages or VET accredited courses, and have integrity for employment and further study. The Standards for RTOs 2015 also ensure registered providers operate ethically with due consideration of learners' and enterprises' needs. There are 8 Standards. Each Standard has a set of clauses.

Stretching – Similar complementary units are merged with some elements remaining incomplete until logistically convenient.

Synchronous – Live training or assessment.

TEQSA – Tertiary Education Quality and Standards Agency.

The survey – a survey of the VET sector's use, experience, and perceptions of online learning as part of our strategic review of online learning. The survey was jointly administered with the National Centre for Vocational Education Research (NCVER) and open to all ASQA-regulated providers from February to March 2021.

Training package – each training package contains 3 components: units of competency, which define the skills and knowledge needed and how to apply them in a workplace context; a qualifications framework, which contains groups of units of competency used to develop learning outcomes and range from Certificate I to Graduate Diploma level; and assessment guidelines, which cover the qualifications required by assessors, the design of assessment processes and guidelines for assessment management.

Training product – an AQF qualification, skill set, unit of competency, accredited short course and module.

VET course – the units of competency in a training package endorsed by the Ministerial Council; or modules of a VET accredited course; or modules of a course accredited by the state-based VET Regulator in Victoria or Western Australia.

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Appendix 1. Regulatory data

Performance assessments and complaints

This appendix outlines the characteristics of the performance assessment reports and complaints records sampled as part of an analysis of regulatory data for the strategic review of online learning. An example of some of the characteristics listed below include variables such as provider size, type of training provided, delivery modality, and level of training qualification.

Characteristics

The sample of regulatory data used in this report included 12 performance assessment reports and 7 complaints records that were identified as demonstrating a range of the challenges, risks, and opportunities of online learning. Other factors informing the sample selection included enabling a comparison of provider practices before and after the COVID-19 pandemic (out of the 12 reports, 4 were conducted prior to March 2020, 3 between March 2020 and March 2021, and 5 after 1 April 2021); and a comparison of information gathered before and 1 April 2021 to allow for contrasts between ASQA's previous regulatory practices and ASQA's new provider performance assessment methodology.

Of the 12 performance assessment reports, other characteristics included:

- size

Four small providers (those with fewer than 100 students enrolled in VET), 5 medium providers (between 100 and 999 students), 3 large providers (1000 or more students).

- mode of delivery

Four providers delivered all training under their scope of registration fully online (including one delivering to over 3000 students).

Half included within the scope of the assessment the delivery of fully online short courses.

- training products

The range of training on scope for each provider ranged from 3 to 91 unique courses offered. The majority of the sample offered training for less than 10 courses.

The scope of training packages assessed across the sample of performance assessment reports included SIT - Tourism, Travel and Hospitality, BSB - Business Services, HLT – Health, CPC - Construction, Plumbing and Services, SIS - Sport, Fitness and Recreation, CHC - Community Services, SIR - Retail Services, FSK - Foundation Skills, ICT - Information and Communications Technology, TAE - Training and Education, FNS - Financial Services.

The sample represented a diversity of training qualification levels, from short courses/single units and Certificate I to Advanced Diploma.

The five most common qualifications being delivered from the sample were: BSB30115 Certificate III in Business, CHC33015 Certificate III in Individual Support, BSB50215 Diploma of Business, SITHFAB002 Provide Responsible Service of Alcohol, SIT40516 Certificate IV in Commercial Cookery.

The sample included two CRICOS registered providers delivering training to international and overseas students.

In addition to the performance assessment reports, the sample of regulatory data also included 7 complaints records relating to delivery of the Responsible Service of Alcohol (RSA) unit of competency qualification. As training that is predominantly delivered fully online, it provided the opportunity explore the challenges and opportunities of delivering online.

Internal consultations

In addition to analysing regulatory data captured in performance assessment reports and a small number of complaints, ASQA undertook internal consultations to leverage the expertise of all staff on their experiences of key issues affecting the opportunities, challenges and risks of online learning. ASQA staff connected across Australia through a video platform to undertake a workshop as well as a focus group comprising experienced quality assessors and compliance officers from across ASQA.

A series of 7 sessions were held with the focus group and explored a range of topics. Specific topics included emerging risks in response to COVID-19; reflections on the challenges of performance assessments done online; hallmarks of best practice online delivery; whether and when particular training packages do or do not align with online delivery; and a discussion of the issues unique to online delivery in relation to providers delivering ESOS. The information gathered in these consultations has been used as a valuable resource to inform the approach to data gathering and to data analysis.

Appendix 2. Provider survey – analysis of qualitative responses

ASQA engaged Griffith University to undertake thematic analysis (Braun et al, 2019) to interpretable responses to open text questions in the survey of providers. A wide range of perspectives are represented in the qualitative data. Respondents were guided to think about the impact of COVID-19 on the move to online delivery of VET, and responses were generally framed in terms of this significant catalyst for change. The responses to the survey can be grouped in terms of (1) description of *challenges* (created by COVID conditions and demanding attention), (2) *responses* (how providers coped, often under pressure) and (3) *benefits* (for students, industry, and providers and their staff). The discussion, below, considers these three areas, differentiating each one into themes that shed light on the main ways providers encountered challenges, responded, and the benefits that followed.

Challenges

Two groups of challenges emerge from the data. There were challenges around *course development and implementation* that involved contending with real or perceived delivery and/or regulatory barriers. A closely related challenge was *issues in practical training and assessment*. Practice of manual or interpersonal skills and practical demonstrations for formative or summative assessment are a common requirement of training packages. This created a special range of challenges for providers. Where the decision was made to move some or all practical delivery and/or assessment online, particular issues arose that were described by survey respondents. These challenges are described in more detail below.

Course development and implementation

Respondents described barriers to developing and implementing quality online courses. Providers were put under pressure by time constraints to develop and implement online teaching and learning without diminishing quality.

> An appropriately developed and delivered online course should be as robust (or more so) than F2F. However, a rushed transition to online meant that quality was often playing catch up.

For some, concerns regarding online education were amplified due to a lack of experience in online delivery. Provider-perceived barriers in the process of the rapid transition to online education emerged from data analysis included: unsuitability for online delivery, course design and structure, online system and management, quality materials, additional cost. Regulatory barriers, on the other hand, were external. Respondents referred to unclear guidance from regulators, lack of support to make changes that were mandatory, perceptions that regulators operated with misconceptions about online learning and concerns that auditors would make ill-informed judgements.

> There is no clear clarity regarding RTO compliance requirements. We have concerns that once the conditions of pandemic are negated the regulator may be inquisitorial in nature to future audit and operation.

Legislation and regulation were also referenced, with immigration and visa laws highlighted as problematic and the effect of these often described as hindering innovation.

Constraints on teaching and learning arising from these barriers were differentiated by respondents. Moving to online delivery highlighted that the new environment made interactions and collaboration among students, and between students and trainers, more difficult than in the face-to-face setting. Opportunities for learning and relationship were reduced, impacting the overall quality of delivery. It was reported that students missed the culture they would be part of in face-to-face learning.

> One of the major limitations of the online learning experience is a lack of communication with classmates and teachers, which can be frustrating for some students.

It was suggested that the new mode of delivery did not agree with the gamut of student learning styles and needs, exposing some of them to learning difficulties not experienced in the face-to-face mode. This problem was exacerbated by perceived limitations on the extent and depth to which monitoring of learning and wellbeing is possible with digital technologies. Again, the traditional approach to delivery seemed to allow more immediate and richer tracking of group and individual student progress.

Observations of student experiences of online learning drew attention to difficulties maintaining student engagement and motivation over the longer term. It was asserted that students could feel isolated – from other students and their teachers/trainers – and that the sense of isolation could result in progressive disengagement and non-completion. Some respondents described students as anxious and uncertain in the new environment, and others expressed concerns about students' mental health.

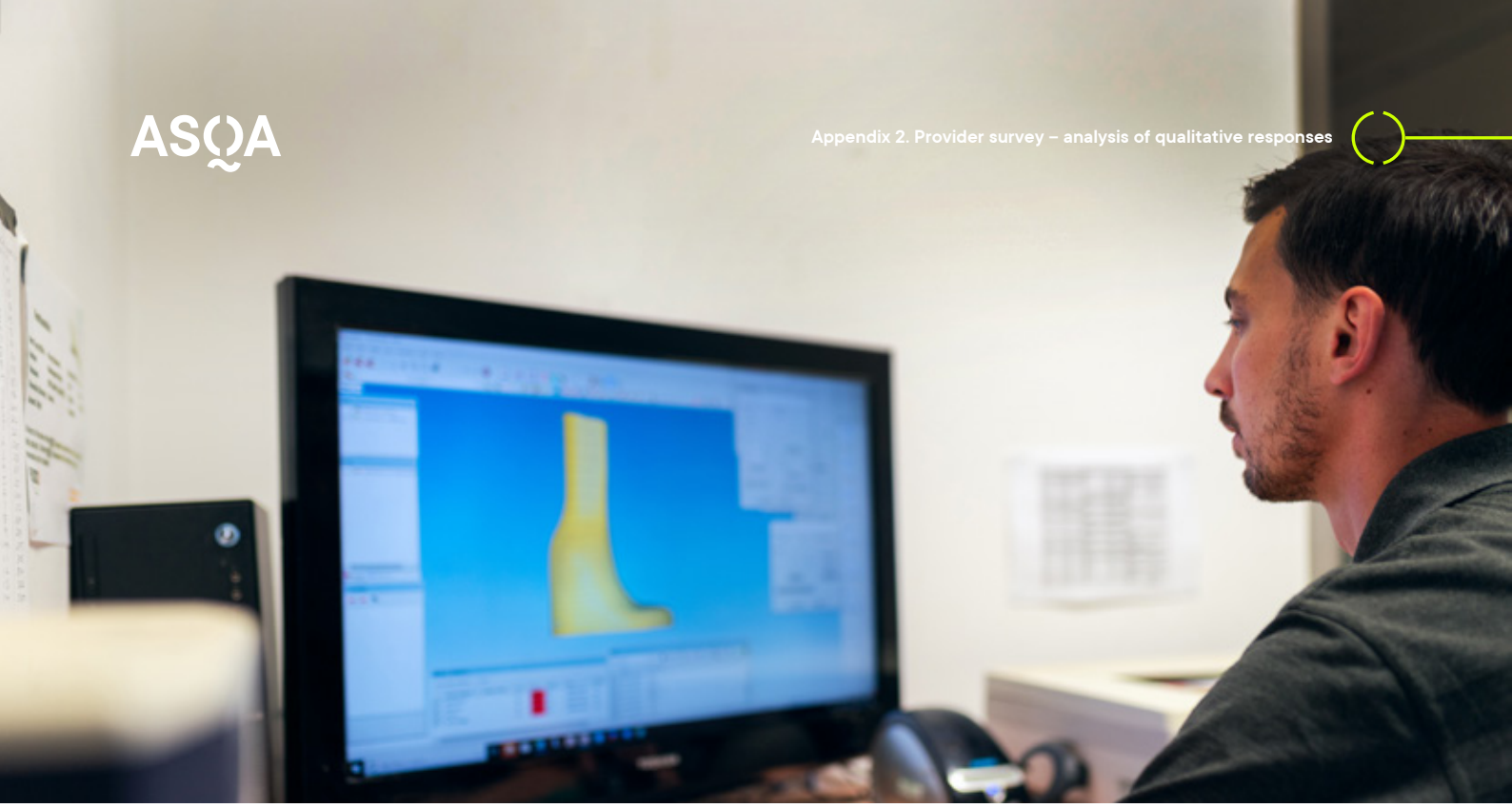
> The mental health issues of our students, they already come to us with anxiety problems and having them to deal with the changes to their education due to covid19 was an added difficulty

Some of the challenges faced by students were seen to stem from digital technology itself. Respondents described situations where students had restricted access to technology (such as when equipment was share among other family members) and/or the technology was not up-to-date and able to accommodate systems and applications used by the provider.

> Students may not have the learning resources (computers/programs) available to participate nor the information technology skills required to participate and group leaning experiences may be impacted.

Apart from problems with access to essential technology, quality of internet connection was frequently cited as a challenge.

> The signal issues really play havoc with the students and how they are responding to the class too many disruptions and you lose their attention with you. Where and how they had to connect was an issue as well.



Broadband plans might not be sufficient to allow the full online experience made available, or the internet could be unreliable and prone to unexpected failure. This issue was not only found on the student side; provider infrastructure could fail, creating wider disturbance to learning. Concerns were also raised about the extent and effectiveness of technology support available to students (and staff). While many providers prioritised this kind of support, it was not always the case that support was available, and in a timely way. A pervasive challenge was student digital literacy. A key component of quality online delivery is learner ability to interact with and benefit from the learning affordances created by providers. Uneven digital literacy levels among students could produce learning difficulties that could be difficult to diagnose and address.

> Students with good computer skills fared way better than students with limited computer skills

Students with digital literacy challenges could be extremely vulnerable in the new learning environment.

Teacher/trainer capabilities were also discussed. Some respondents were concerned about the mental health of staff as well as that of students.

> Student & Staff mental health and wellbeing were adversely impacted and have placed a very high demand on existing support services.

Respondents acknowledged that teacher/trainers could be underprepared for the move to online delivery. Concerns were raised about their knowledge of and skill in methods for engaging students within the new learning environment. Alongside these concerns were others about teacher/trainer facility with digital systems, applications and technologies regarded as essential tools for online delivery.

> The trainers and assessors do not have the skills to deliver the training online.

Occasionally, respondents expressed concern about the quality of internet connections used by teacher/trainers. For some respondents the language of 'digital literacy' was used to articulate concerns about both the ability of students and trainers to leverage the affordances of online learning. The challenges of learning online were seen to be shared by all users of digital learning systems.

Challenges in practical training and assessment

VET is traditionally associated with practical skill learning and assessment, and that focus is still important for many industries. Practical training and assessment is identified with manipulation of materials and equipment, and dealing with people in service roles. This kind of training and assessment is therefore difficult to disentangle from physical, in-person engagement. COVID-19 was highly disruptive in relation to practical training and assessment due to restriction of physical, in-person engagements. The impact of those restrictions on provision was complicated. Some arose from providers' own concerns about risks brought about by moving face-to-face delivery online. Academic integrity and authenticity was a focus for providers who were unable to vouch for the effectiveness and reach of delivery or the veracity of assessment evidence gathered digitally.

> I feel risks are more associated with assessment eg. validity (not collecting adequate performance evidence through demonstration), authenticity (the learner has to make a declaration that it is their own work, however, RTOs need to be very alert to plagiarism and adequate validity to support authenticity), volume of learning (learners rushing training/assessment due to the flexibility online learning affords).

Concerns were also held for the quality of learning outcomes since opportunities for physical interaction with materials, tools and/or people might be reduced. For some providers, there were concerns about the work-readiness of graduates from courses where some or all delivery was online.

Respondents described some of ways COVID-19 restrictions and influences impacted their ability to maintain their practical training and assessment components.

> The performing arts industry shut down during COVID, and so did our opportunity to present theatrical performances and shoot films. Some units of competency required live performance outcomes; we dealt with this by getting them to perform live but through livestream and on Zoom, and do a radio play project instead. We can still assess in this manner, but the student experience of the assessment is less rewarding for them (i.e. not being able to perform in a play or musical).

Social distancing rules served to reduce learner group size (limiting peer-to-peer learning opportunities and impacting income), and access to resources and equipment was reduced as provider premises and workplaces were restricted or closed to comply with government rules or market pressures. In this context, work placements were especially affected by the pandemic. Workplaces might shut their doors to VET work placement, reduce places, and could shut down for periods or formally close business.

> The CHC training packages are affected, since the age care centers and nursing home were locked down, students were not able to do practical assessments.

Alongside these challenges, trainers and assessors working in the placement environment themselves were restricted so that even if a given workplace was accepting students, provider staff might not be able to bring the delivery and assessment to the site. This difficulty could extend to third-party supervision, with this important activity in some cases restricted or suspended. Even where government rules did not apply, were relaxed, or no longer applied, some businesses retained an unwillingness to accept VET students. The attitudes of some workplaces thus became an issues for providers reliance on work placement opportunities for their students.

Another kind of challenge described derived from training package rules. Restrictions and explicit requirements meant that some training simply could not be moved online. In other cases, assessment evidence requirements were cited as barriers.

> The physical distancing of 1.5m could not be maintained for the Units of Competency (UoC) necessary for workers to maintain their authorisation to work on or near the Endeavour Energy electrical distribution network. The eight UoC referred to by Energy Networks Australia (ENA) as regulatory units, are assessed annually. Workers were required to complete the theory element via eLearning before their authorisation anniversary however the practical assessments were delayed and resumed in 2021

Respondents also referred to unclear rules pertaining to assessment evidence, and whether remote digital evidence collection would be possible. Volume of learning was another issue, with concerns raised that students would not be able demonstrate the amount of hours in particular environments to satisfy training package rules.

In connection with practical training and assessment challenges (problems complying with rules and/or difficulties accessing workplaces), survey respondents named training packages and qualifications especially impacted. The table below indicates which training packages were most impacted by the pandemic as reflected in number of responses highlighting difficulties.

Figure 4. Training packages most referenced as affected by COVID-19

Training Package	Responses	Percentage (%)
CHC Community Services	146	31.5
SIT Tourism, Travel and Hospitality	66	14.3
HLT Health	39	8.4
SIS Sport, Fitness and Recreation	9	1.9
RII Resources and Infrastructure Industry	8	1.7
BSB Business Services	7	1.5
CPC Construction, Plumbing and Services	6	1.3
TLI Transport and Logistics	6	1.3
SHB Hairdressing and Beauty Services	5	1.1
CUA Creative Arts and Culture	4	0.9
SIR Retail Services	4	0.9
ACM Animal Care and Management	3	0.6
AUR Automotive	3	0.6
MEM Manufacturing and Engineering	3	0.6
MSF Furnishing	2	0.4
UET Transmission, Distribution and Rail	2	0.4
AVI Aviation	1	0.2
CPP Property Services	1	0.2

Training Package	Responses	Percentage (%)
ICT Information and Communications Technology	1	0.2
MEA Aeroskills	1	0.2
PMA Chemical, Hydrocarbons and Refining	1	0.2
UEE Electrotechnology	1	0.2

Source: ASQA's survey of providers experiences of the shift online (2021)

Responses of providers to the challenges

The qualitative survey data described a range of challenges brought by the COVID-19 pandemic. Some of these challenges were firmly focused on disruptions to face-to-face delivery and assessment. Others were concerned with the implementation of alternatives with online delivery emerging as a complex issue. How providers responded to these challenges is the focus of this section.

These responses can be grouped into three sets of themes. For those providers that made the move to online delivery, course design and resource development work, upgrading or acquiring new learning management systems, and developing the learning and delivery capabilities of teachers/trainers and students were key lines of strategic activity. Alongside these activities, respondents described attention to processes of quality assurance and management which were enacted by providers whether they moved to online delivery or not. The third set of themes concerns the means by which training, assessment and work placement quality was actually maintained. This set of themes spans responses that involved moving all, some or no delivery online.

Updating systems and capabilities

Providers that embraced online learning were prompted by COVID-19 conditions to review their delivery and assessment strategies and resources. This process was described by respondents who decided to move existing face-to-face delivery to full or partly online provision.

> We internally reviewed and validated online assessment materials and restructured our unit by unit delivery to suit online assessment (where we were able to) until normal practise could resume with our blended learners.

How to translate effective learning activities undertaken in a physical space into effective online delivery was a question that demanded review, revision and ingenuity. Some respondents described developing completely new resources, and adding them to current delivery activities (producing blended offerings) or to translated activities.

> We have used this period to commence updating and re-writing current course content and add additional courses to our scope and catalogue.

Videos and audio resources were frequently produced to augment these offerings. A set of respondents described more far-reaching changes that involved redesigning courses from the ground up to fully leverage digital delivery technologies and applications. Often, provider reviews of existing systems, methods and resources pointed to the need for fundamental re-design, and respondents commented on the commitment (and investment) required to follow up. In connection with more fundamental shifts to support quality online delivery, learning management systems (LMSs) and online learning platforms were discussed by respondents. For some, responding to the challenges involved adopting an LMS (e.g. Moodle) for the first time, or a more platforms for delivering online (e.g. one or more Google applications).

> A lot of time was taken to investigate the most suitable LMS and third-parties that would help us shift our learning and assessment resources to an online platform. Once we found and developed these partnerships the process of shifting online became fairly straightforward (though still time consuming). This has placed us well for the future to expand our online content if it's deemed appropriate (i.e has the support of our employer groups we network with).

In other cases, responding entailed upgrading LMSs and other platforms. Comments referring to LMSs and platforms could also touch on the question of how a blended delivery model would work. That is, some respondents revealed an interest in making streamlined systems available for blended delivery so that moving between the two modes would be experienced as easy to navigate and integrate.

A focus of comments in relation to the outcome of reviews and decisions about online delivery platforms was that of teacher/trainer and student capability development and general technology support. Provider staff were offered professional development in a variety of forms and for a range of purposes, from how to make online delivery engaging through to developing expertise in software used by the provider to facilitate online learning.

> We did upskill some of our trainers who usually only delivered face to face, and we all had to learn Microsoft Teams and Google Meetings, because some clients preferred those platforms to Zoom and our Online Campus platform.

Students were frequently acknowledged as a population that could be in need of digital literacy skill development, and some providers offered induction and/or training specifically to address learner digital literacy. Alongside capability development for staff and sometimes students too, providers described measures taken to ensure just-in-time technical support was available.

Enacting quality assurance and management

Quality assurance and management was a distinct focus for respondents, with workforce expansion, teaching quality measures, and gathering feedback from users and/or formal evaluation of provision emerging as the main topics.
Some providers hired new employees to ensure that in the move to online delivery, quality was not compromised. For example, people were engaged to audit delivery and assessment activities but also to support staff in the process consolidating new approaches. These were internal procedures in the service of maintaining quality. The quality of teaching was enhanced and assured in other ways, too. Supervision arrangements for teacher/trainers and assessors were intensified by some providers, while processes of peer review and collaboration were initiated or strengthened was a strategy described by some.

> Collaboration between trainers increased substantially, with daily online Teams Meetings at the end of each day. The support provided between the trainers was extraordinary.

Evaluation and performance review processes were instigated by some providers. The voices of teacher/trainers, students and other stakeholders were sought via surveys and interviews to provide insight into the effectiveness of new systems, applications, and delivery and assessment approaches. Hiring extra staff, mentioned above, was often part of a strategy to monitor the evolution of practices. Student engagement and completion rates became crucial indicators of the effectiveness of changes. While completion rates were data that could be captured using existing measures, understanding student motivation and engagement in online learning required fresh thinking about monitoring techniques. According to some respondents, industry partners and other external bodies were invited to participate in review and collaboration to ensure changes to provision would be acceptable to an important cohort of end users.

> We have had bigger engagement with the companies who send people to us for training and we have amped up our QI process to ensure we maintain satisfaction levels and are meeting trainee expectations. We have also recently been audited by our maritime regulator which enabled us to have detailed conversations around appropriate COVID teaching strategies.

Maintaining training, assessment and work placement quality

The third main theme for responses to COVID-19 challenges relates to maintenance of quality of training, assessment and work placement. Respondents detailed specific ways delivery and assessment were adjusted to manoeuvre through the new conditions. A range of strategies were put in place ranging from innovative delivery methods through to rescheduling training and assessment and alerting students to alternative options. Another way quality of provision was maintained was through increased efforts to support students, both in terms of their wellbeing and in terms of helping them succeed in their studies. As mentioned already, support was extended by some providers to boost digital literacy among students, and to allow direct technical support. Many respondents expressed confidence that the quality of delivery and assessment was maintained through the period of change. The adjustments they made were judged to be sufficient to enable continuity of quality provision.

> Because of the time and money we spent in the design and delivery of online training to ensure quality outcomes for students we could successfully engage.

Among strategies to maintain quality training and assessment, existing content, methods and activities deemed essential for provision were appraised for their suitability to online delivery. For some respondents, role play and other forms of work simulation employed for delivery and assessment purposes warranted close attention. Difficulties were described and in some cases modifications explained so that these forms of simulation could continued to be used in the new setting.

> BSB training package had role-play activities, which had to be modified to be able to perform as online activities, but was difficult for some students to follow the instructions.

Assessment evidence collection received close attention.

> Methods of providing evidence for assessment has included video and sound files to customise and individualise the student responses and ensure academic integrity.

Digital techniques for recording practice and demonstration of competency – both for formative and summative assessment purposes – were considered, developed and implemented where the innovation was deemed acceptable to stakeholders.

Digitalised remote observations, video recordings and video conferencing (e.g. via Zoom) were employed extensively as means to continue delivery and assessment, replacing familiar aspects of delivery and assessment in a straight-forward and intuitive way. Some respondents specified that only theoretical content was regarded as suited to online delivery.

> We put all practicals on hold where needed and focused on the theory.

Hence, concepts, terms, theories, legislation and regulations were seen to be appropriate content for online delivery, with learning and assessment of skills and other practical components of competency were reserved for face-to-face delivery. However, some respondents described a move to wholly online delivery. Particular training packages, qualifications and units of competency were regarded as inherently capable of adaptation to the online environment when coupled with adjustments to learning and assessment strategies and appropriate online systems and applications facilitated by skilled teacher/trainers and assessors. A final strategy described was heightened attention to and scrutiny of processes for moderating and validating assessment outcomes.

> The online training we integrated has been reviewed and validated against outcomes to ensure we are meeting training and assessment requirements,

For some providers, ensuring that graduates possessed competencies to the level expected by industry became a focus and assessment integrity stood out as the key to assuring quality. Thus increased and/or revised forms of validation and moderation were applied to maintain quality.

A significant number of respondents described quality maintenance strategies that involved delaying, suspending or cancelling training and/or assessment.

> For the most part we did not deliver any training until the latter part of the year.

A common reason offered for these strategies was that face-to-face delivery and assessment was a requirement (of training package rules or regulators – sectoral and/or industry) and that shifting any of these activities online was simply not allowable. Other respondents expressed the view that online delivery could not be more than a low-quality alternative. Providers sometimes suspended part or all of their operations. Others were forced to manage delays in work placement activity largely due to host business compliance with government rules or sometimes unwillingness to expose staff and customers to more risk than necessary. A variation on this theme was the practice of offering students choice given the new conditions. Alternative units of competency might be offered, or different qualification paths or the option to shift to another provider. In other cases, students were given a choice between online delivery and face-to-face delivery, with the caveat that the latter mode would be delayed until rules allowed resumption of this form of provision.

> We gave our students the option to undertake online learning or to suspend their studies. We ensured that those students who opted for online study were sufficiently supported in all aspects of their education journey.

Maintenance of quality training, assessment and work placement involved attending to student needs – whether for wellbeing or supporting them in their studies. Many respondents described an increase in student support activity.

> The more online delivery created a stronger need for students to reach out to their trainer. So individual contact increased. The decrease in face to face visits pushed more online, zoom type and phone and text contact

In some cases this took the form of additional video conference sessions so that students could share their experiences and concerns outside the formal learning program. Phone support was also offered to students who required that kind of flexibility. In general, providers ascertained that students needed to be able to reach their teachers/trainers and assessors more easily, and efforts were made to extend accessibility. Other providers initiated contact with students. These 'check in' contacts were a way to demonstrate to students that they were supported and gave providers a way to proactively monitor student engagement. Respondents mentioned that they had concerns about student engagement under COVID-19 conditions, so different kinds of monitoring were implemented. Respondents also described relaxation of assessment deadlines as a way to ease pressure on students, again revealing a concern with the wellbeing of learners.

> We provided free extensions to 2020 students as some lost projects because of lockdowns and down sizing so were unable to complete.

As mentioned, student digital literacy was considered an important skill set to develop, and special sessions and other kinds of assistance were put in place to help bring learners up to a level of effective functioning in the new environment. Another point that has been raised is making technical support available, a measure designed to intervene in learning engagement difficulties.

A strong message from respondents in relation to maintenance of quality provision was that the strategies put in place in response to the challenges of the pandemic – making the transition to online delivery in a systematic way, quality assurance and management processes, instituting new forms of delivery or suspending and delaying face-to-face delivery, active support to students – were generally successful.

> Because of the time and money we spent in the design and delivery of online training to ensure quality outcomes for students we could successfully engage.

Respondents expressed confidence that challenges were met and quality was maintained. Not all respondents described success, but most did suggesting that in general, Australian VET navigated COVID-19 in a way that minimised disruption or where service was reduced, it was done so in the cause of quality.

Benefits of online

Under the final theme, responses that relate to consolidation of new practices, a new appreciation of the affordances of online delivery, and envisaging a future in which online delivery is a routine part of VET provision are grouped. Positive attitudes toward the challenges brought by COVID-19 were evident among the responses. For some respondents, taking some or all delivery online allowed their RTO to remain viable through a fundamentally disruptive period for the sector. Shifting to online delivery meant these providers could survive, a realisation that was accompanied by a confident tone. Going beyond mere survival, other providers thrived once they assimilated the need to come to grips with the new environment and make internal changes necessary to facilitate effective online delivery. Respondents described a range of innovations spurred by the crisis. For some, this was a result of being forced to reflect on their models and approaches to delivery and assessment. Some indicated that systems and programs were in need of review anyway, and that the new conditions precipitated a round of renewal that was overdue. Some made strides in delivery and assessment technologies and methods, expressing satisfaction with the quality of their products and services.

Increased flexibility for learning

A number of respondents described the benefits of taking delivery and assessment online. In particular, the new mode of provision allowed students from a wider variety of locations to be enrolled into courses.

> Ability to reach people from different areas (especially the regional/remote). Ability to combine groups from various state/areas which were limited before due to geography. Ability to utilise trainers from across the states.

Respondents also indicated that adopting online delivery demonstrated to their students and industry partners that the RTO was innovative, potentially providing an edge in the competitive VET market. Some respondents made reference to benefits of online delivery for students. For instance, students were able to participate in learning without leaving their workplaces. Travel time and costs were reduced for students and provider staff, making participation in VET more economical and convenient. In some cases, online delivery was linked with decreased risk of infection as students and staff were not required to physically interact with others in the delivery setting, but also when travel to training meant using public transport.

> Students were able to avoid public transport and stay safe. Plus they saved a lot of money on commutation.

Increased quality of learning

Respondents described a range of benefits for quality of learning. Some described improvements due to design innovations.

> Trainers have been able to spend more time with students teaching practical skills, as the theory load has been reduced via online tools. Online has been able to reduce a significant amount of duplication that the SSO's include in packages. Previously, when paper based, they'd have to answer similar questions, over and over again. Online allows us to capture the information once and allocate against each unit in the qual.

Many reported that interactions between students and teacher/trainers actually increases in the online environment. While for some providers, increased communication with students was part of a deliberate strategy to maintain engagement and completion rates, there was also the message that digital technology inherently promoted closer learning relationships.

> Student engagement and discussion increased using chat rooms and comment board. Class interaction and depth of discussion improved beyond what is typical in a classroom setting. We have seen significant benefits by incorporating an online mode.

According to some respondents, student attendance rates were actually boosted through use of digital technologies. Measures of student interaction with resources and during synchronic learning events revealed that participation rates were higher than expected. Respondents also reported that student progress was facilitated by moving to online delivery and assessment. In part, online delivery was implemented because more traditional alternatives were unavailable, and that allowed students to continue their studies with minimal disruption. Recorded training sessions allowed students the flexibility to study when it suited them. But digital technologies also allowed closer, real-time monitoring of student engagement. With this information, providers were able to rapidly intervene in individual student cases or make adjustments to delivery and assessment to circumvent issues.

> We were able to track student progress more effectively by being able to see exactly where they were up to in real time.

Increased student satisfaction

Respondents reported that a substantial number of students expressed a preference for online delivery, as disclosed in course evaluation data. For reasons already canvassed (more economical, convenient and safer participation) student preference for online learning can be readily appreciated.

> Some students discovered that the liked training on Zoom. In one Diploma course the students decided they wanted classes to remain on Zoom after the lockdown ended.

Digital technology also allowed greater flexibility for students, since live sessions could be recorded and access (or reviewed) at times that suited students. It is not surprising, then, that respondents reported increased student satisfaction with their offerings. Taking some or all provision online was positively regarded by many students.

> Our students appreciate our online approach because they are based nationally and internationally and can complete professional development and VET qualifications while they work. (In fact this makes their experience even richer and often results in promotions.) They can also broaden their engineering skills if their workplace demands it.

On the side of teacher/trainer and student digital capability development, respondents described improvements in quality of delivery and student learning due to their response to the COVID-19 challenges. As indicated, students were offered greater flexibility through online delivery (they could benefit from training sessions via accessing recordings), and being able to revisit these recordings was counted as a benefit for students who wished to deepen their understanding of sessions they had attended.

> Videoing delivery sessions so that students could revisit the class at any time for additional learning and students who missed a Zoom class could have access and catch up on their learning.

The greater flexibility and incidental benefits such as ongoing access to learning resources lead to improved quality of outcomes. Another improvement to learning derived from greater use of self-paced delivery made possible when training was revied and redesigned to leverage the affordances of the digital environment. As indicated above, many respondents took the challenges of the pandemic as an opportunity to update their learning resources, systems and methods, and greater student freedom to interact with course materials was often an outcome that was welcomed by students. Respondents also explained that students benefitted from the unintended learning outcomes associated with the need to use and engage with digital technologies.

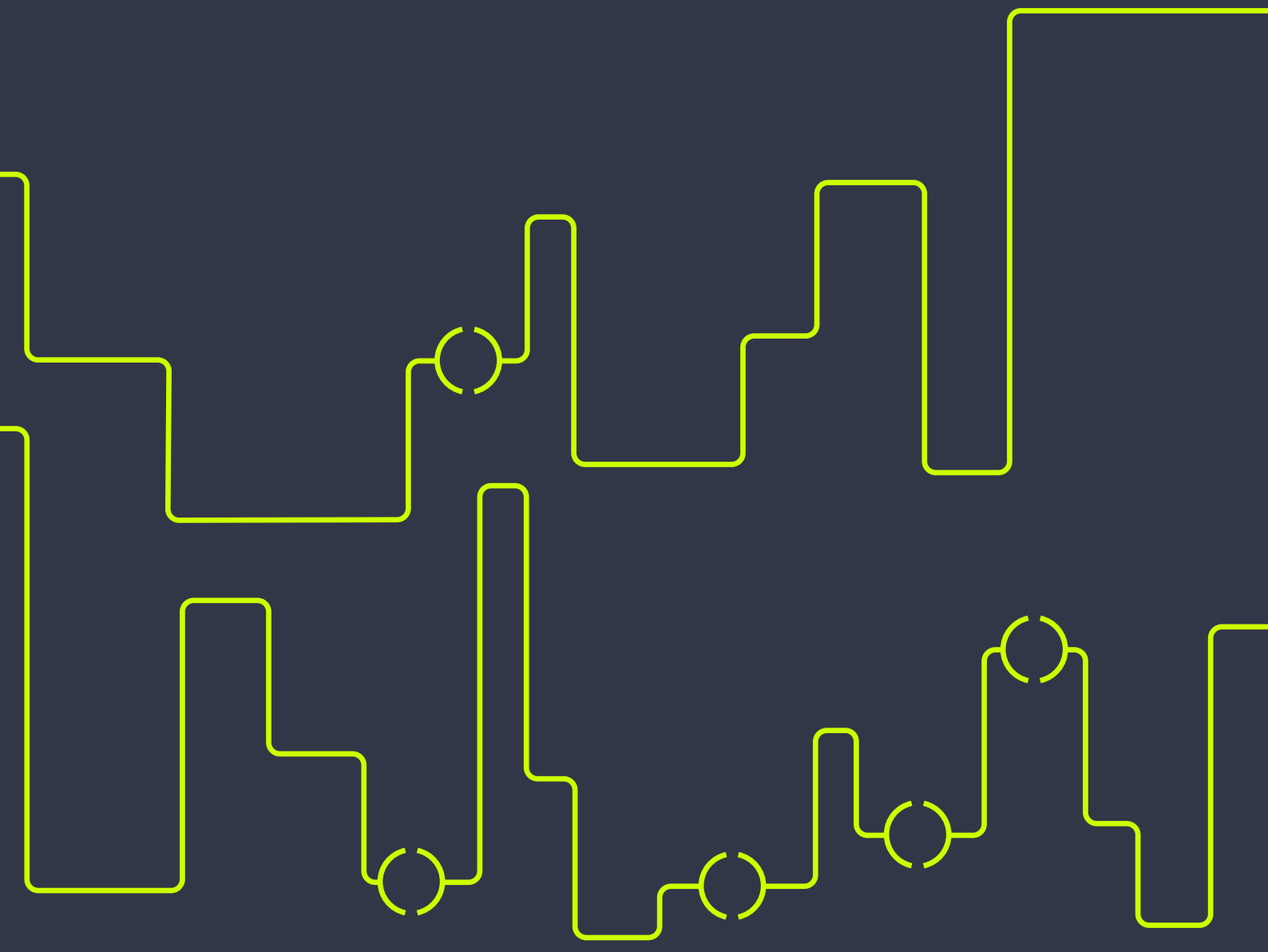
> Students are getting better IT skills. These IT skills will be helpful once they will be on jobs.

Student digital literacy

Student digital literacy – regarded as a foundation skill for the contemporary workforce – developed, and students in industries covered by training packages such as ICT and TAE were able to experience and interact with technologies and processes that they would be able to apply in their industries. Where providers modelled innovative use of digital technologies, students stood to learn a range of skills that are not necessarily specified in the units of competency.

Teachers/trainers and assessors were also seen as beneficiaries of online learning. Respondents reported a boost in morale among staff due to time savings associated with digital delivery and some said the new working arrangements allowed greater work-life balance. Other benefits included smaller student groups and greater interaction with individual students. Staff also appreciated developing new skills, often increasing confidence in their practice, and the opportunity to revisit routine ways of working to find ways to update their skills.

> Teachers have gained new expertise and acquire a new set of skills due to the shift online which have played a tremendous role in reducing the impact of COVID-19 on the students' online learning.



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