



**ACEVic response to
Securing our future economic prosperity
Discussion paper on Skills Reform
April 2008**

ACEVic is the peak organisation for Adult Community Education organisations in Victoria. Its members comprise nearly 200 of the state's approximately 350 ACE providers. ACEVic members are based in all ACFE regions including in remote parts of the state. They range in size from very small neighborhood houses with an income of less than \$100 000, through to large community based businesses with multiple functions and seven figure annual incomes.

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Question 1: If government supported training for all eligible Victorians were introduced, what should the eligibility criteria look like?

Overall position on reform

ACE providers are confident of their ability to attract learners and achieve learner outcomes. We welcome the opportunity to operate in a more open market. Our expectation, however, is that the focus of reform will be competition on learner engagement and outcomes, rather than a narrow price driven approach, which is unlikely to achieve substantial outcomes for the type of learners who have traditionally taken part in ACE.

ACEVic supports training resources being targeted on an access and equity basis, taking into account capacity to pay, and public / private benefit. We believe that this is an efficient and responsible use of government funding and certainly preferable to a system based on historical allocations, provider type or a “first come first served” approach.

We believe, however, that any reform of the “eligibility criteria” for the whole training system should maintain some flexibility and capacity to negotiate for those learners undertaking entry level training.

Success in working with eligibility criteria

ACE has a good track record of targeting training to the hardest to reach Victorians under the current eligibility regime employed by ACFE. We know, for example, that a learner in ACE is less likely to have achieved year 10 or its equivalent than a student in TAFE or private RTO’s, is more likely to be Koori, and almost twice as likely to have a disability. ACE providers are the primary VET providers in many regional and remote communities. (2004 AVETMISS data, NCVET)

Outcomes for targeted learners

ACE achieves strong employment outcomes, despite targeting the most difficult to reach Victorians. A recent longitudinal study found the proportion of sampled participants employed full-time more than doubled from 13 percent in 2004 to 28 percent in 2006. The unemployment rate amongst the sample group declined by one-third, from 24 per cent in 2004 to only 8 per cent in 2006. Of those who had been unemployed in 2004, 52 per cent were working in 2005 and 63 per cent were working in 2006. Only 27 per cent remained unemployed in 2005, but this dropped to 19 per cent in 2006. (Walstab, Volkoff & Teese, 2004 – 2006 ACE Longitudinal Study)

Allowing for flexibility

ACE providers report that in many instances adults who require significant support in order to access paid employment present for ACE programs but don’t fit any of the current priority learner groups. Some examples include:

- Adults who have a year 12 equivalent qualification achieved many years ago, which met the needs of employment or further training when it was first achieved, but which is not

equivalent in skills terms to a current year 12 level qualification. This is particularly the case where the adult has been out of the paid workforce or been in short term, low skill jobs since the achievement of that qualification.

- Parents returning to work after a long period out of the paid workforce, many with qualifications but diminished confidence to regain entry into employment.
- Adults who have a year 12 level qualification from an overseas country, which has not prepared them for employment or higher education in an Australian context.
- Adults with year 12 or higher qualifications who have suffered ill health, including mental illness, (often undiagnosed) which has left them without the generic skills or attributes required by employers, nor the social and emotional support required to re-engage in the workforce.

Under the current system, there is some room for negotiation with ACEF regional offices to orient delivery to targeted groups while allowing for others who don't fit a particular priority group to access training. It is important that adults like these above, who might not meet the new eligibility criteria, have the opportunity to access government funded training in order to re-engage with the community and re-orient themselves to the world of work.

Value of negotiated targets

ACEVic's position is that entry level training in a community setting, by its very nature, is targeted to people unable to access higher levels of training. Our track record in achieving employment and training outcomes for the hardest to reach Victorians is strong. The capacity to negotiate mixes of learner groups is at the heart of this success.

Recommendations:

1. That new system maintain some flexibility to take into account learners who might not meet the eligibility criteria, but who are nonetheless experiencing genuine disadvantage, and who, therefore require government support to engage in VET.
2. That the eligibility criteria be broad for learners accessing entry level and generic employability skills training and if tightening of eligibility occurs that it be directed at higher-level qualifications with a more direct return on investment to the individual.

Question 2: How could this proposal be marketed to encourage higher take up, particularly amongst Victorians who have never considered VET studies.

Marketing the Whole VET System ACE providers in Victoria, although well known in their local communities, are often not widely recognized as part of the broader VET system. The pathway between VET in ACE and VET in TAFE, for example, is often not understood until students are actually in the system. Any marketing that focuses on the whole VET system, including ACE and Skills Stores is likely to result in increased take up in VET studies.

Enhancing ACE as an Entry Point to the System ACE is an effective entry point to the VET system. Strengthening ACE as a first point of engagement with the system is likely to increase take-up in VET studies. Recent research into participation in training for unemployed adults in the Federal Welfare to Work scheme, identified the following major barriers to participation: “For clients, barriers associated with transport, child care, health, the competing pressures of the needs of children, the demands of Centrelink and, sometimes, feelings of inadequacy all contribute to a diminished desire to undertake training.” (*Guenther, et al 2008*)

ACE militates against these barriers to VET participation through its local nature, small class sizes, welcoming environments and its integration with other social and community services and supports so that disadvantaged adults can be dealt with as “people with complex needs rather than clients of single services.” (*A Fairer Victoria, 2008*) The 2004- 2006 ACE Longitudinal study found: “Overall, respondents were extremely positive about their experiences of learning in ACE. There was strong endorsement of the ACE sector’s learning environment by all students”. This report also found, however, that a lack of training places in ACE was impacting on learner’s capacity to stay in the VET system. Of those taking part in ACE training in 2004 but not studying in 2006, “15 per cent of this group reported that they wanted to study in ACE but the course they wanted to study was not available.” Simply matching supply to demand in ACE in and of itself is likely to encourage higher take up amongst Victorians who have never considered VET studies.

Maximizing Pathways Within the System Many of the learners who present at ACE providers for entry-level programs don’t immediately see the benefits of vocational education and training. The ACE Longitudinal Study, for example, indicated strong employment and further study outcomes for learners in ACE, yet this

same study suggested that learners' motivation for study was often not vocational. For example, the single highest reason for the 2006 sampled students enrolling in a new course was to 'improve well being and confidence' (93% agreement), followed by 'meet new people and share a learning activity.' (89% agreement)

As educators we recognize these motivators as "generic employability skills" which precipitate further engagement in VET and increased likelihood of gaining and keeping work. However, our learners often don't make this connection. Many come in to ACE centres unaware of what they are capable of, and, therefore, not looking out for what the system can provide. Many are still "learning to learn". Their view of themselves as workers on a career path or potential workers only emerges through engagement and achievement.

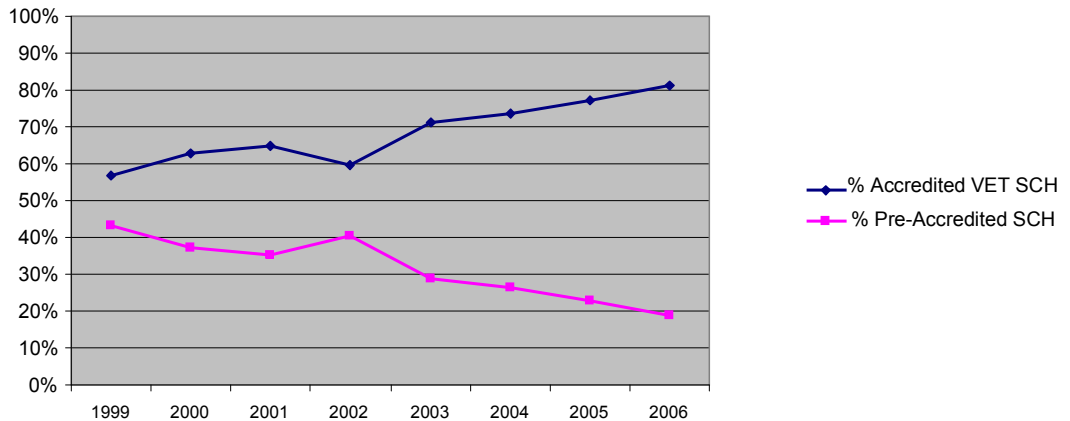
Targeted marketing to learners already in ACE with clear information about their options and entitlements is likely to increase the chance of them moving on to other VET courses and programs. Supporting ACE providers to offer career advice and skills recognition services and to build partnerships with other training providers is also likely to facilitate engagement in higher-level qualifications in the VET system.

Pre-Accredited Training as a pathway to accredited training and employment

That 60% of all learners in ACE take part in pre-accredited training is testament to the ability of this type of delivery to engage large volumes of people in VET. The fact that this 60% of learners are funded through only 20% of ACE delivery dollars indicates the cost effective nature of pre-accredited ACE. "The blend of accredited and pre-accredited learning offered by ACE provides a unique advantage and reach into the community to the most disadvantaged and disengaged learners. For these learners pre-accredited delivery is the first preparatory step on their learning pathway to accredited education and training." (*Pre-Accredited Delivery in ACE, 2008 Report to ACFE Board*)

Once people are engaged in VET through pre-accredited training, there is evidence that they then articulate into certificate programs. Of those ACE students sampled in the ACE Longitudinal Study, 30% undertook pre-accredited (subject only) delivery in 2004. Of this group, 31% progressed to Certificate 1 programs or above in 2005. The study also documented the passage of learners from accredited delivery to higher-level studies in ACE.

Yet despite the success of pre-accredited delivery in engaging learners and providing them with a pathway into VET, since 2002 ACFE funded delivery has trended away from pre-accredited to accredited training.



Source: *Pre-Accredited Delivery in ACE, 2008 Report to ACFE Board*

Our members have indicated that one of the factors behind this trend is a lack of new training places in the system. The ACE Longitudinal study suggested that “39 per cent of respondents felt that the ‘course was too short for the content that had to be covered’” Anecdotal advice from our members suggests that the lack of new training places going into ACE over a number of years has meant that pre-accredited programs have had to compete with longer accredited programs for limited training dollars. In other words, providers have responded to the demand for increased delivery hours for current clients, by reducing the opportunities for potential new clients.

Unique approach to Pre-accredited Training

Pre-accredited training plays a quite unique role in the VET system as a first point of engagement with a high level of cost effectiveness. Given this, it is difficult to see how its value would be increased in a demand driven system. In order to strengthen ACE’s role as an entry point to the VET system, additional pre-accredited training places need to be provided, and these places need to be maintained in the current negotiated system, rather than being opened up to competition.

Recommendations:

1. That government market the entire VET system, including ACE and Skills Stores.
2. That clear information and career advice be provided to students already in ACE, who may have engaged for non-vocational reasons, but who are now ready for information about their vocational options.

3. That pre-accredited training continues to be funded on a negotiated rather than a demand driven basis.
4. That additional resources be made available for pre-accredited training.

Question 3: What proportion of course costs do you think is reasonable for an individual or business to contribute?

Question 4: Is it reasonable to introduce higher fees for students for training courses that deliver higher individual benefits with improved employment opportunities?

Capacity to pay

Under the current fees and charges system, ACE students pay a higher proportion of the overall cost of their training than students in other parts of the VET system. This is because the fees that they pay are the same as other provider types (as determined by the Ministerial Directive on Fees and Charges, which applies to the whole VET sector), but the student contact hour rate contributed by government is lower (currently an average of \$6.28 per student contact hour for ACE). Given that ACE funding is targeted at entry-level training, largely for disadvantaged groups, this means that students with the least capacity to pay, who are at the beginning of their learning journey pay a higher proportion of the total costs of their training.

Government Return on Investment for entry level training

Aside from the access and equity arguments for reform, there are strong economic arguments for gearing public investment towards learners with lower skills. Research into adult literacy, for example, indicates a strong return on investment for expenditure on adults with low skill levels. In a 2004 study by Coulombe, Tremblay and Marchand, across a range of OECD countries, International Adult Literacy Survey data was used to demonstrate that investment in increasing the literacy skills of adults has a “direct and positive impact on labour productivity and in GDP per capita. It highlighted that the **greatest impact** was gained by investing in improving the skills at the lower levels”. (*Coulombe, Trambly & Marchand, 2004, our emphasis added*)

True cost of delivery

In most provision of government services it is recognized that disadvantaged groups are more expensive to provide services for than the mainstream, because agencies and organisations have to provide additional supports to compensate for the many barriers to participation. ACE providers, for instance, take a holistic, case management approach to each student. They provide smaller class sizes. Many provide community-based childcare. They spend considerable time building partnerships with other community-based providers of social services to leverage additional support for clients. These activities underpin the success of ACE but they cost money and need to be recognized in any new funding model.

Within TAFE, the higher student contact hour is used to pay for

infrastructure, such as disability support services, counseling services, student learning support services, etc. ACE has a higher needs clientele but a lower funding base from which to provide these services.

This need for funding to take into account the higher needs of unemployed learners with barriers to participation is supported by recent reviews of the federal Welfare to Work program. As Guenther reports: “employment-disadvantaged people require a lot more intensive support to encourage them to overcome the multiple barriers they face when looking for work. A case management approach that deliberately includes skills development should be incorporated. This will require additional resources. However, the costs involved are potentially offset because the likelihood that these people will remain unemployed or underemployed for extended periods of time is reduced”.

Recommendations:

1. That the mix of government and individual funding for VET training be based on a formula which takes into account access and equity considerations, genuine costs associated with providing access to disadvantaged groups and a holistic assessment of return on investment to the government and the individual.
2. That increases in the fees charged for students for training courses that deliver higher individual benefits with improved employment opportunities be accompanied by an adjustment in the ratio of government to individual funding for courses which focus on generic employability skills, including language and literacy, particularly for disadvantaged groups.

Question 5: Should the Government consider an income contingent loan scheme as currently applies to university education?

*ICLs to match
high fee courses*

Income contingent loan schemes work on the principle that individuals will be willing to take on debt to finance training because the training will lead to higher wages. This willingness to incur debt is based, therefore, on confidence that a clear link exists between the training and the likely employment result. If a readjustment of public / private balance of fees occurs on the basis of access and equity and capacity to pay as recommended above, and this does lead to higher course fees in some higher level courses, then it is reasonable that participants have the opportunity to repay these fees over time rather than upfront. This particularly makes sense with those qualifications at AQF level 5 and above which align with Higher Education Qualifications, where income contingent loans are available.

Recommendation:

1. That the government introduce an income contingent loan system as currently applies to university education.

Question 6: How can the system be structured to produce a better match between the further needs of the Victorian economy and the training choice made by individuals and businesses?

Value of local industry advice

While many ACE providers deliver outside their geographic area, their core business is skills development through local community development, as supported in the state government's A Fairer Victoria action plan. ACE providers are committed to supporting learners to access work and recognize the important role that ITAB's play in mapping demand and supply in particular industry areas across the whole of the VET system. However, the "place based" focus and expertise of ACE calls for a response that takes into account local factors, particularly in rural and regional Victoria.

In ACE the matching of demand to supply of VET training is currently negotiated with providers by regional ACFE staff using Regional Delivery Plans. The close relationship between providers and local employers, especially small business, is also an effective source of information about supply and demand in local communities. Negotiation of targets in response to local needs should continue post reform.

Industry demand for generic employability skills

Business and industry strongly support the need for increased generic employability skills, including language and literacy. For example a recent survey by the Australian Industry Group, reports "Firms recognise the need for a mix of generic or 'soft' skills for innovation. Problem-solving is rated the most important 'soft' skill (31.7%); followed by communication (25.8%); adapting to change (23.5%); and teamwork (18.9%). (*Skilling for Innovation, National CEO Survey, 2008, Australian Industry Group and Deloitte*)

ITAB's have not traditionally offered specific advice about how and where generic employability skills training is most effectively supplied. An increased focus in the system on generic employability skills and language and literacy training will benefit all industries and contribute strongly to the further needs of the broader Victorian economy, therefore a broad range of sources of advice need to be drawn on to make training decisions around generic employability skills.

Role of entry level training

It's important to note also that career paths are not always linear. Entry-level training in a specific vocational area is often used as an orientation to the world of work and vocational education. While contextualized for a specific industry area, the content of many Certificate 2 and 3 level qualifications is heavily focused on generic

employability skills. A lack of direct match between entry level training and specific industry needs, does not in and of itself mean that the training is not contributing to the needs of the Victorian economy.

Recommendations:

1. That local sources of information be used alongside broader industry information to determine the training focus of individual ACE providers.
2. That the provision of generic employability skills including language and literacy, which meet the demands of all industry areas be strengthened in a reformed system.
3. That a broad range of sources of advice be drawn on to make planning decisions around delivery of language and literacy and generic employability skills training.

Question 7: How can Government best support TAFE and ACFE providers to thrive in a more competitive environment?

Question 8: How can government make its support for students undertaking training available in a way that encourages training providers to be more innovative, flexible and responsive to the needs of individuals and businesses?

Level of competition in ACE ACE providers have been working in competitive environments at a level usually associated with the “for profit” rather than the “not for profit” sector for some years now. Many successfully compete for contestable federal funding sources such as the Language, Literacy and Numeracy and Priority Employment Places programs. The ratio of full fee for service to government funded training in providers is high. In order to access funding from ACFE, providers have to complete a Financial Viability Statement, which requires that they achieve proportions of their income from sources other than ACFE and maintain strong current ratios and profit margins. ACEVic members are confident of their ability to compete with other providers of VET, where a level playing field exists and where registration for delivery recognizes the broad range of services and supports required to engage difficult to reach learners.

Stability of funding For many ACE providers, ACFE funding is one of their few remaining sources of non-contestable income. In addition, many of their other sources of government funding, for example, VCAL and Youth Guarantee funding have a poor track record of timely payments and yet ACE providers’ creditors demand payment within normal business terms of 7 to 14 days. In a more competitive environment, there should be some stability of ACFE funding for ACE providers, particularly small providers operating in thin markets, in order for them to survive and thrive.

Holistic quality indicators There is no “quick fix” for entrenched educational disadvantage. In a more competitive system, disadvantaged learners would need to be protected from providers who can meet short term targets but who lack the long term commitment to community development to ensure that a broad range of services and supports are in place to assist the learner on what is often a long and challenging learning journey. The implementation of what Sanguinetti, et al, 2004, refer to as “ACE pedagogy” is more than just the sum of its parts. In their research into the success of ACE in providing generic employability skills training, they find:

“This report demonstrates the many ways in which ACE

practitioners are able to engage marginalised ‘second chance’ learners of all ages and ethnicities in explicit learning while attending to implicit processes of their personal, intellectual and social development. However, ACE pedagogy is as much the product of the shared culture and values, enabling management, community orientation and community linkages that characterise ACE learning centres.”(Sanguinetti et al, 2004, *The ACE Experience, Pedagogies for Life and Experience*)

In a more competitive system, registration to become an ACE provider and quality indicators for delivery of VET training should take into account the complexity of the administrative and pedagogical mix required to achieve sustainable long-term outcomes with marginalized learners.

Capacity to attract skilled staff

ACE providers are themselves challenged by skills shortages; with many providers reporting an inability to recruit new teachers as “baby boomers” retire. Our capacity to compete with other provider types is closely linked to our capacity to pay comparable wages. If there is to be true competition based on delivery outcomes to learners, then there must be parity of student contact hour rate across provider types. The capacity of ACE providers to operate on a heavily reduced student contact hour rate is unsustainable in an era of skills shortages and should not be seen as an indicator that competition over price can deliver sustainable efficiencies across the VET system.

Clients with complex needs

There are some lessons to be learnt here from the increased competition in skills and workforce participation delivery of the former federal government’s Welfare to Work initiative, which saw increased competition amongst providers of services for unemployed adults. While efficiencies were achieved in the provision of many of these services to the mainstream, overall, increased price based competition failed to engage challenging client groups in work. (*Engaging our Potential: The economic and social necessity of increasing workforce participation, 2007, Business Council of Australia*)

The multiple barriers to participation of this co-hort require cooperation across agencies and organizations and investment by government. Price based competition delivers neither of these. The true cost to the Australian economy of the failure to engage long term unemployed adults in learning or work is yet to be fully realized, but is likely to be high. In an address to the not for profit sector, Senator Ursula Stevens, the Federal Parliamentary Secretary for Social Inclusion commented thus:

“We also recognise that competitive tendering and the 'new' public sector management model has impacted on the not-for-profit's

sector's capacity to innovate, share information and ideas and respond to emerging issues.” (Address to the CPA Annual Not-For-Profit Conference, May 2008) While ACE organisations support increased competition over capacity to attract students and deliver learner outcomes, we concur with Senator Stevens that price based competition for VET delivery is likely to impact on the capacity of ACE providers to share information and ideas and respond to emerging issues.

Professional development, capital works, marketing and branding

A competitive environment only truly exists when there is a ‘level playing field’. Apart from the inequities in the student contact hour rate between ACE providers, the TAFE system and private providers, the TAFE system is also given a business advantage through the provision of substantial capital works investment, centralized professional development via the TAFE Development Centre, and centralized support with marketing and branding. ACE providers are appreciative of the support that they currently receive from the ACFE Division in the areas of professional development and access to the Microsoft Agreement, however, additional support in the areas of professional development, marketing and branding and capital works would assist ACE providers to thrive in a more competitive environment.

Value of peak bodies

The small size and volume of ACE providers means that there are limited economies of scale for individual providers to develop research capability or to respond to public policy. Peak bodies, such as ACEVic play an important role in supporting small organisations to interpret and respond to public policy. Government support for ACEVic would assist ACE providers, particularly small ones to engage in research in order to provide independent responses to public policy.

Monitoring and review of the reform

The most successful businesses and organisations are willing to take risks and to critically analyze failures. Given the size and scale of this reform, there need to be mechanisms in place to monitor its roll out and to respond to any unintended consequences of reform. ACEVic would like the opportunity to work cooperatively with government to provide ongoing advice and support on the implementation of this reform.

Recommendations:

1. That funding in a new competitive environment offer stability to providers along with flexibility to match supply with demand. This could be achieved, for example, through the provision of a proportion of funding in advance based on an assessment of likely delivery with the balance to follow dependant on student

enrolments. Also, by any “after the fact” payments meeting standard business terms of 7 – 14 days.

2. That competition focuses on outcomes for learners, particularly difficult-to-engage learners, rather than the pursuit of short-term efficiencies.
3. That registration processes and quality indicators used to determine success in a competitive market, take into account the complex mix of support required to engage learners with high needs.
4. That a “level playing field” for competition be developed through parity of student contact hour rate for the same outcomes, access to capital works, professional development and marketing.
5. That ACEVic be financially supported to assist ACE providers to research and respond to public policy affecting ACE.
6. That a rigorous process be put in place for ongoing review of the reform, including any unintended consequences and that peak organisations be supported to engage in this process on behalf of their constituents.

Question 9: In what ways can Government help individuals and businesses better understand and access the benefits of vocational education and training?

Information for non-training organisations As not for profit community based organisations, ACE providers have close relationships with other community based agencies. Many of our students are referred by these agencies. Training information targeted to non-training agencies and organisations would assist in supporting individuals to understand and access the benefits of vocational education and training.

Information for small business Where ACE organisations provide training to business, this is often achieved through building relationships with individual employers, especially small business. Supporting these businesses with clear information about training opportunities within the entire VET system including ACE, will likely increase the chances of them accessing VET.

Enhanced career advice within robust ACE providers As outlined above, many participants in ACE programs access pre-accredited and entry-level programs with their local ACE provider with no specific vocational aim in mind. Their sense of a possible career path emerges through engagement and achievement. Many require support with complex information about systems with which they are unfamiliar. Because of their small size and scale, career and course advice is more difficult to provide in ACE organisations and particularly challenging on the low student contact hour rate provided. A robust ACE sector which is supported to provide additional course advice services and to pursue relationships with other providers will result in better quality course and career information being provided to learners.

Relationship between formal and non-formal learning. ACE providers offer more than just vocational programs. They also offer a range of non-vocational community engagement courses that are outside the scope of ACFE funding, and are generally provided through fee for service or via small grants from local government, Vic Health or philanthropic organisations. Many of these programs have an important preventative health and social inclusion function, which contributes to productivity. They foster a culture of lifelong learning and provide participants with an ongoing relationship with the vocational training system. Some examples include Men’s Sheds, art and music classes, Community Wide Study Circles and health and wellbeing classes.

While the provision of these non-vocational programs is outside the scope of this review, taking a whole of government approach to service delivery requires that these programs be considered as part of the mix, and that future government reviews consider the interrelationship between vocational and non-vocational training and the relationship

between non-formal learning and productivity.

Recommendations:

1. That improved information on the training system be made available to individuals and business, and also to non-training agencies and organizations.
2. That ACE organisations be supported to provide course and career advice for current and potential learners.
3. That a future review consider the links between productivity and non-vocational learning and the links between vocational and non-vocational learning.

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