

The Academy of Interactive Entertainment

**Submission to the Department of Education  
and Training**

*Quality of Assessment in VET*

*Discussion Paper*

## Submission details

1. Submission made on behalf of:  Individual  Organisation

2. Full name:

3. Organisation (if applicable):

4. Please indicate your interest in this discussion paper:

(i.e. as a student, VET practitioner, RTO, third-party provider, peak body, business, industry representative, regulator or other government agency or community member)

5. Do you want your submission to be published on the department's website or otherwise be made publicly available?  Yes  No

a. If yes, do you want your name and organisation (if applicable) to be published alongside your submission, OR would you like for only your submission to be available and your details kept anonymous?  Published  Anonymous

b. If no, please advise the department upon submission that you do not want your submission to be published or otherwise be made publicly available.

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## Introduction

The Academy of Interactive Entertainment Ltd is a specialist games and film educator established by industry with alumni around the world. We have operations in Australia and internationally, and our Australian campuses in Sydney, Canberra, Melbourne, Adelaide, Online and Perth form our registered training organisation.

We offer a range of VET qualifications from Certificate II through to Graduate Diploma, and we have developed an accredited course, *10343NAT Advanced Diploma of Professional Game Development*, in response to industry needs and delivered by innovative professionals with one foot in the door of industry and another in the training room. We offer a *Bachelor of Games and Virtual Worlds* in collaboration with the Canberra Institute of Technology, a business incubator program which encourages entrepreneurial activity from our graduates and we have several articulation arrangements for graduates of our VET programs wishing to enrol at other universities.

2016 marks AIE's 20th anniversary since commencing operations in 1996, and since then we have been regularly acknowledged and recognised by industry, government and the VET sector as the leading provider of education and training in the game development, film visual effects and animation industries.

AIE is a member of a number of industry bodies and professional associations, including ACPET and VELG. We employ teachers who are well-known industry professionals with significant experience working on major game and film projects in Australia and abroad. They are supported by a strong leadership group consisting of campus and faculty heads and an Academic Management and Compliance Team.

Such is our focus on the quality of teaching, learning and assessment in our work that we employ a dedicated Teaching and Learning Coordinator and National Teacher Training Coordinator to support teachers, Heads of Faculty and Heads of School to ensure that our staff have access to initial and ongoing internal professional development opportunities relating to vocational education and training.

We welcome the opportunity to contribute to the debate regarding quality assessment in VET, and we believe that a properly functioning, effective VET sector is critical to Australia's economy into the future.

## Executive Summary

AIE has chosen to respond to this discussion paper as a key stakeholder in the VET sector. We are a Registered Training Organisation with direct industry links through our teaching staff and the broader interactive entertainment industry.

The VET sector is a vibrant, dynamic system essential to the provision of strong, relevant skills to Australians in the 21st Century. However, one of the pillars of the system continues to be eroded by a lack of effective government action.

At the core of a successful vocational training system is robust and credible competency based assessment. We are, after all, measuring standards that relate to employment skills and knowledge. The quality of assessment has been debased over time by the inability of regulators to enforce uniform quality outcomes thus permitting the TAE 'ticket' to train and assess to be bought rather than earned. This situation has encouraged a race to the bottom as good providers try to compete with ever falling prices and volumes of learning in TAE qualification delivery.

To counter this decline in standards, we recommend a three pronged approach.

Firstly, we need a fundamental change in the approach to auditing and compliance within the VET sector. A shift is required to outcome-based auditing rather than input auditing; a refocus on what learners' real outcomes are rather than desktop audits looking at a set of required documentation around training and assessment. This will require more comprehensive auditing of RTOs who are known to ASQA to be delivering sub-standard qualifications, especially relating to VET teacher training.

Secondly, we need to seriously consider a practicum element to current trainer/assessor qualifications. This methodology is used in other countries and serves as a useful tool to raise standards, permit greater scrutiny of actual competency and reduce the viability of short duration, fly by night, bogus RPL type of TAE delivery.

Thirdly, the VET Sector needs to embrace the idea of a national registration process for VET assessors perhaps through a grass roots professional association focused on establishing and maintaining clear assessor standards.

Our other recommendations and comments are detailed below.

The system works. RTOs like ours make it work. Despite the frequent changes to the VET system, we have been producing world class graduates for twenty years now; many of whom are working in studios in Australia and around the world.

We welcome the opportunity to be involved in making the system work better.

**James Burnett**  
National Teacher Training Coordinator

**Ian Gibson**  
Senior Academic Manager

25/02/2016

## Summary of Recommendations

Recommendation #1: That the Minister direct ASQA to establish a TAE Taskforce to focus on auditing assessment outcomes of TAE graduates rather than a focus on inputs such as RTO policies and procedures.

Recommendation #2: That no changes occur to the eligibility of RTOs to deliver TAE qualifications and skill sets internally.

Recommendation #3: That no changes occur to the existing availability of RPL for TAE qualifications and skill sets.

Recommendation #4: That any changes to the assessment of units in TAE qualifications include greater reference to the Australian VET context rather than general references to VET and CBA systems.

Recommendation #5: That no changes occur to the requirements to train/assess TAE qualifications and skill sets beyond what is required in the Standards for RTOs 2015, at least until such time as further investigation is done into VET practitioner registration.

Recommendation #6: That further research be done to examine whether some sort of teacher registration process could be trialled with TAE practitioners, similar to what is required for school teacher accreditation.

Recommendation #7: That further research be conducted to develop models for a practicum component within the Certificate IV in Training and Assessment and Diploma of VET.

Recommendation #8: That no additional design or development of assessment tools be added to the Certificate IV in Training and Assessment.

Recommendation #9: That the DET further research and consult with the VET sector regarding a professional association, and a more detailed governance and funding model be put to sector consultation.

Recommendation #10: That there be consideration given to graduate outcome surveys for identified qualifications.

## 1 - RTO limitations

### **(A) Is it appropriate for relatively large numbers of RTOs to deliver TAE qualifications or skill sets? Should the number be reduced to a targeted number of RTOs focusing on high-quality provision?**

If quality is the concern, then it should be incumbent upon ASQA to ensure that TAE qualifications remain a targeted focus of auditing. As with any training product linked to licensing, there are always going to be issues raised with the quality of assessment and concerns expressed regarding unscrupulous providers. To artificially restrict the number of providers is problematic. However, a greater compliance focus, the addition of a practicum component and an assessor registration requirement would encourage higher levels of quality, disempower short term 'bad providers' and naturally reduce the number of RTOs in the TAE space.

The increased focus on ensuring compliance, should be an "outcomes-based" methodology of auditing which examines what is actually achieved by learners. Where inputs – processes and policies and tools – are audited, there should be a more empirical auditing of "outcomes" in assessments, as the lived experience of many students does not always reflect the policies and processes that RTOs show ASQA at audit time. Does the RTO's delivery and assessment of the Cert IV TAE, for example, accurately reflect what is written in the Training and Assessment Strategy? Is what is written similar to the learning experience as recounted by the student?

There are other strategies that could be implemented to maintain the quality of TAE products, such as ASQA randomly and directly communicating with TAE graduates to investigate potential non-compliances. Everyone seems to have a story about a dodgy three-day Cert IV TAE course but no RTO is going to publish this in a compliance document or training and assessment strategy. ASQA needs to go deeper when auditing and focus more on the learners.

*[Recommendation #1: That the Minister direct ASQA to establish a TAE Taskforce to focus on auditing assessment outcomes of TAE graduates rather than a focus on inputs such as RTO policies and procedures.](#)*

### **(B) Should RTOs be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors?**

The rules of evidence and the transparency of the VET sector should mean that it does not matter whether RTOs issue TAE qualifications or skill sets internally. The important matter here is the integrity of the assessment, which would be revealed quite easily through a targeted ASQA audit. From an organisational perspective, many RTOs deliver courses internally in order to attract high calibre industry experts into teaching roles. Enterprise RTOs, for example, like the Australian Army or Woolworths, rely on internal processes to effectively train their trainers.

The entire concept of competence is that it is performed to a workplace standard. There is no better context for a trainer/assessor to complete their Certificate IV in Training and Assessment than through the company for which they work. There are huge benefits for beginning practitioners to have a highly contextualised apprenticeship/traineeship-style environment in which to do their initial training; much the same as the School-Centred Initial Teacher Training (SCITT) program used in schools in England, which is an alternative, practical non-university pathway for graduates to gain Qualified Teacher Status.<sup>1</sup>

Of note here is also the detrimental impact of a policy in this direction towards volunteer groups such as surf lifesaving bodies, state emergency services and volunteer fire brigades. They rely on contextualised internal delivery of TAE skill sets to volunteers in order to conduct training and assessment. Arguably, this process is essential to their effectiveness and

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<sup>1</sup> UK Department for Education. (n.d). Get into teaching: School-Centred Initial Teacher Training. Accessed at: <https://getintoteaching.education.gov.uk/explore-my-options/school-led-training/scitt>

sustainability. There's really no difference between an employee and a volunteer in terms of potential conflict of interest. The important feature of our competency-based system is that it is evidence-based and clear scrutiny that the rules of evidence and principles of assessment are being followed is more effective than banning internal delivery and assessment. Indeed, forbidding internal delivery often sends employees out to grab the first, cheapest and dodgiest TAE qualification they can find.

Many RTOs effectively utilise TAE products on scope to nurture and encourage their practitioners to gain formal recognition for their professional development activities. For example, our RTO is currently investigating the feasibility of delivering *TAEDEL404A Mentor in the workplace* to our senior teachers who mentor and supervise our new teachers working under supervision arrangements (as per SRTO Clause 1.17).

Our RTO operates in the creative industries sector and we employ a National Teacher Training Coordinator whose role includes facilitating the *Certificate IV in Training and Assessment* in a highly contextualised environment to teachers who we recruit directly from industry. Any move away from this would inversely affect our ability to ensure that new teachers are equipped to properly teach in our specialised industry.

*[Recommendation #2: That no changes occur to the eligibility of RTOs to deliver TAE qualifications and skill sets internally.](#)*

**(C) Are TAE qualifications and skill sets so significant that evidence of competence should not—or cannot—be appropriately demonstrated via recognition of prior learning?**

- **Is recognition of prior learning for TAE qualifications or skill sets granted with sufficient rigour to ensure the quality of student assessment? Should the practice be restricted?**

There should be no significant difference between the granting of recognition of prior learning (RPL) and the rigour of assessment for a traditional deliver-and-assess pathway. As mentioned earlier, it should be incumbent upon ASQA to ensure that TAE qualifications and skill sets are the particular focus of audits to ensure quality in assessment. RPL is a key feature of any competency-based training and assessment framework so the practice should not be restricted but its enforcement more rigorously applied.

In this situation, again perhaps ASQA needs to provide greater direction or clarity as to the specialised contexts in which those seeking RPL must have experience. For example, there is no requirement in the *TAEASS402A Assess competence* that a candidate have Australian-specific experience, yet we would argue that the unique nature of the Australian VET Quality Framework would demand this.

For the Diploma and higher level TAE qualifications, RPL should be encouraged rather than not. It directly feeds into our opinion below that students seeking a TAE Diploma should have VET industry experience, and this would specifically lend itself to an RPL pathway.

*[Recommendation #3: That no changes occur to the existing availability of RPL for TAE qualifications and skill sets.](#)*

*[Recommendation #4: That any changes to the assessment of units in TAE qualifications include greater reference to the Australian VET context rather than general references to VET and CBA systems.](#)*

**(D) Are there opportunities to improve the assessment skills of the VET workforce through changes to the delivery and assessment of TAE qualifications and skill sets?**

- **Should TAE qualifications and skill sets only be delivered by VET practitioners who can demonstrate a specific period of training and/or assessing employment history in the VET sector?**

- **What circumstances would support a change requiring some VET trainers and assessors to hold university level or higher-level VET qualifications, for example, practitioners delivering and assessing TAE qualifications and skill sets?**

Generally, there seems to be wide industry agreement that TAE qualifications and skill sets should only be delivered by VET practitioners with significant experience and/or qualifications. For example, there is no dispute that trainers/assessors delivering the Cert IV TAE should hold the Diploma or higher in adult education, which SRT01.23 expects from 2017. However, we suggest that there is no need to go further than what is specified in SRT01.21-1.25. Indeed, many TAE trainer/assessors have qualifications well above and beyond the requirement. Our Cert IV TAE teacher holds three relevant Diplomas and will soon complete a Graduate Diploma in Adult and Vocational Education, and has nearly a decade of experience in the VET sector. It is in the best interests of RTOs to employ qualified and experienced VET practitioners who can deliver and assess teacher training qualifications with confidence and a deep knowledge of the sector.

There is an argument that TAE teachers should be required to undergo some sort of teacher registration, which would inevitably be the key role of a national professional association (addressed later). However, setting arbitrary timeframes for eligibility to deliver TAE products is not useful to determine the actual breadth and depth of a practitioner's experience. For example, setting a minimum "5 years' experience in VET training and assessment" does not accurately reveal how much experience this person may have had in RPL, or validation, or designing learning programs, beyond their own initial Cert IV TAE training. It would make sense that anyone delivering a TAE product could be involved in the first trials for registration with a national VET practitioner association, including a "Professional Portfolio" showcasing their experience and skills in the TAE product/s that they deliver. This then effectively becomes an extension of their Trainer Profile.

*[Recommendation #5: That no changes occur to the requirements to train/assess TAE qualifications and skill sets beyond what is required in the Standards for RTOs 2015, at least until such time as further investigation is done into VET practitioner registration.](#)*

*[Recommendation #6: That further research be done to examine whether some sort of teacher registration process could be trialled with TAE practitioners, similar to what is required for school teacher accreditation.](#)*

- **Should the TAE Certificate IV and/or Diploma require a practical component? If so, how long should the practical component be?**

We agree that the lack of sufficient training and assessment activity required to gain a Certificate IV in Training and Assessment across the sector is a significant concern. A Cert IV TAE graduate has completed a minimum of 3 assessment events (including an RPL), 3 x group-based deliveries and 2 x individual deliveries. This is abysmally low and it is not appropriate considering that a Cert IV TAE graduate is then permitted to assess any qualification for which they also hold vocational competencies.

We strongly support the implementation of some kind of professional experience placement for all new Cert IV and Diploma students to lift the amount of training and assessment activity that they complete under mentoring and supervision in order to gain their full qualification. A suitable practical component for the Cert IV TAE could have a mix of quantity-based and quality-based outcomes. For example, this could require conducting 20 assessments and 20 hours of delivery (quantity-based) and meeting competency-based outcomes such as "confidently explains assessment decisions to candidates" (quality-based). The addition of a practicum period would also allow more effective monitoring of the effectiveness of initial training and assist in raising the professional status of assessors. The practicum would require accurate reporting and its successful completion could lead to registration by a professional body – and the full award of the qualification.

Research in this area should be a truly consultative and grass roots process – not focused on regulation and compliance but rather on a genuine increase in the quality of training and assessment in VET. RTOs are best placed to describe how a practicum might best work as opposed to VET academics or government entities.

*[Recommendation #7: That further research be conducted to develop models for a practical component within the Cert IV TAE and Dip VET.](#)*

- **Should entrants to the TAE Diploma be required to demonstrate employment history in the VET industry before being issued with the qualification? Would this condition help to improve the relevance and validity of assessment? How long would this period of time be?**

We do not have any significant issue with entrants to TAE Diplomas being required to demonstrate employment history in the VET industry. The Diplomas generally lend themselves to RPL pathways rather than learning and assessment and, from a policy and curriculum perspective, this actually seems preferable. As for the actual period of time, it is hard to say as no two people will be the same in the breadth and depth of experiences, it all comes back to the dimensions of competence and each individual's experience. It becomes incumbent on the assessor to make a determination of "competence".

As mentioned previously, it is essential that someone holding a Diploma of VET have significant experience not just in competency-based training and assessment but specifically in the Australian VET sector.

*[Recommendation #4: see above](#)*

## 2 - Skills and qualifications of trainers and assessors

**(A) Should the TAE Certificate IV be changed to a core unit on the design and development of assessment tools? How would this improve assessment outcomes for students?**

- **Should the core unit be the existing TAEASS502B Design and develop assessment tools unit of competency? Are there alternative approaches, such as developing a new unit on the design and development of assessment tools?**
- **Is the TAEASS502B Design and develop assessment tools unit of competency a specialist unit that should only sit at the diploma-level on the basis the Certificate IV is currently designed for delivery to new entrants seeking to be trainers and assessors?**

Only a small number of trainers and assessors are actively involved in the development of assessment tools, which was one key reason for the removal of the equivalent unit from the TAA40104 in the release of the TAE40110. TAE40110 candidates already get some exposure to assessment tool development when they are required to develop a simple assessment instrument. It is unnecessary and illogical to expect every trainer/assessor to be actively involved in the development of assessment tools, especially when many RTOs buy in resources, have separate staff involved in resource development, or have a designated resource development team made up of select (and usually senior) teachers.

We do not see how inserting a core unit for assessment tool development will result in improved assessment outcomes across the VET sector. If anything, the big concern here is the lack of formal guidance given to assessors after they complete their Cert IV TAE. There seems to be a sector-wide lackadaisical approach to properly inducting assessors on the assessment tools that they use. Our RTO combats this through internal delivery of the Cert IV TAE and Assessor Skill Set to ensure quality control, through developing mentoring and induction program for teachers who already hold their Cert IV TAE and by reinforcing the application of the rules of evidence and principles of assessment at our professional development activities. Quality of assessor inductions becomes another area for ASQA to more closely monitor as an “outcomes-based approach” to auditing.

We assert that the TAEASS502B should remain a specialist unit at Diploma level, and that the Certificate IV is an entry level qualification to the profession. The design and development of assessment tools is a specialist function that many trainers and assessors neither require nor desire. It is best left as a core in the TAE Diplomas and an elective in the Cert IV TAE.

*[Recommendation #1: see above](#)*

*[Recommendation #8: That no additional design or development of assessment tools be added to the Certificate IV in Training and Assessment.](#)*

**(B) In the case of making any updates to the TAE, is it appropriate to form judgements based on majority considerations? Or is it too risky to do so? Is it a better basis for decision makers to give strong weight to key stakeholders and the nature of the argument put forward?**

Any consultation process is going to have stakeholders present a variety of perspectives and this is a natural part of any democratic model. Ultimately it places good governance at risk to expect to cater to the needs and wishes of every single stakeholder. Conversely, it would be risky to give additional weight to some stakeholders at the expense of others. The important features of a good consultation would involve industry, teachers/trainers, students, RTOs, government and VET regulators. However, it has been concerning how the “noisy minority” and “squeaky wheels” have had an inverse impact on many VET policies. For example, the poor performance of some VET FEE-HELP providers, and the subsequent media focus, have had a major impact on many low risk RTOs, with the government’s knee-jerk VET FEE-HELP arrangements for 2016 being a true case of “policy on the run is policy underdone”.

### 3 - Benefits and purpose of a VET professional association

#### (A) Is there a need to establish a national professional association for Australia's VET system?

- Specifically, is there a clear role for Australian governments in assisting the development of professional skills of the VET workforce by funding a professional association?

The development of a national professional association for VET educators would be a significant step forward in terms of raising the status of VET teachers/trainers and ensuring the integrity of qualifications of VET educators. It would also reduce a significant amount of burden on individuals and RTOs in managing their own teacher profiles and accreditation. Some individuals work for multiple RTOs and have to comply with a range of different requirements including expectations relating to industry engagement and vocational competencies and access to professional development activities.

The mandate for such an association needs to be clearly prescribed. It should not remove the requirement for individual trainers and RTOs to professionally develop with their industry stakeholders, for example, nor in any way act as a substitute for expertise in the industries the RTO serves. The domains of accreditation, registration and some level of ongoing professional development in competency based training and assessment best practice appear to be the most applicable. One area that we agree would be of use is to trial the mandatory registration of TAE practitioners.

Australian governments would have a clear role in the development of professional skills of the VET workforce. They should contribute targeted and general funding to the professional association to address areas of need as identified by industry and the sector. Most of the support for a national professional association has come from vocational education academics rather than industry proper<sup>2</sup>, so it is essential that a comprehensive consultation process capture all parts of the sector.

It is also important for any association to be a Federal initiative and not subject to the inevitable discord and discrepancies that would appear if individual states and territories are funded to establish their own versions of what should be one national association.

#### (B) What are the barriers to establishing a national professional association? How could these be overcome?

The most significant barriers to establishment would be cost and the development of a generic accreditation model (if indeed this becomes the main function of such a body). These seem to be establishment hurdles, however, and in time would become of much benefit to the VET workforce making, for example, movement between RTOs much easier for the casual workforce. Achieving consensus between jurisdictions and buy-in from RTOs is also a barrier. The association needs to be seen and sold as a benefit to RTOs and stakeholders rather than as yet another imposition and cost.

#### (C) What would be the most useful guiding purpose of a national professional association

The most useful guiding purpose of a national professional association would be for accreditation of trainers/assessors to ensure a consistent and quality-driven approach to accreditation. Such an association could also offer professional development activities however RTOs should be allowed and expected to continue to conduct their own professional development options for their workforce based on their own needs.

*[Recommendation #9: That the DET further research and consult with the VET sector regarding a professional association, and a more detailed governance and funding model be put to sector consultation.](#)*

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<sup>2</sup> Guthrie, H. (2012). The issue of Cert IV TAE, *Training & Development* 39(1), 8-10.;

Mitchell, J. & Ward, J. (2010). *Carrots, sticks, a mix, or other options: a scoping report which considers the feasibility of options for a systematic approach to capability development of trainers and assessors in the VET sector*, final report to the National Quality Council. TVET Australia: Melbourne.;

Wheelahan, L. & Curtin, E. (2010). *The quality of teaching in VET: overview*. Australian College of Educators: Canberra.

## 4 - Potential activities of a VET professional association

**(A) What activities would be most beneficial for a national professional association to undertake? For example, would it:**

- coordinate, approve or design professional development programs
- develop capability frameworks
- positively promote the profession of VET trainers and assessors as an employment destination and career path to attract professionals
- act as an advocate and voice for VET trainers and assessors
- interact with industry to respond to their emerging needs
- register VET practitioners?

All of the above are feasible and valid for such a professional association to undertake. However the mandate for a professional association needs to come from actual practitioners – not university academics, not government and not “industry reference groups” or any single lobby group. The governance and constitution of such an association needs to be trusted by RTOs above all and attempt to bridge the separate agendas that owners, managers, trainers, governments and unions tend to bring to the table. It needs to support, advise and monitor rather than dictate while still maintaining accurate, objective data for registration purposes.

Again it has to be, and seen to be, of benefit to RTOs.

To begin, it would seem that the first logical function of such an association would be to trial a registration/accreditation process for some practitioners. This could be trialled on TAE practitioners, who should have strong aptitude to participate in such an activity.

[Recommendation #6: see above](#)

**(B) What advantages would there be to conducting these activities at a national level rather than through existing professional development undertaken through membership of existing groups, or that which is currently organised by RTOs?**

The right of RTOs to plan their own professional development should be considered sacrosanct. RTOs develop professional development activities that address organisational needs and as part of internal development programs. It would be incongruent with the concept of the VET sector (teaching about flexibility as a principle of assessment) if RTOs were told that organisational PD was less relevant (and therefore less priority) than industry-wide PD.

However, there is some argument for external professional development activities that could be targeted towards industry-wide issues, for example the quality of assessment. This is where such a professional association may come of use, although we note that there are already several organisations operating within the VET sector who offer professional development to practitioners. Any resources would be better utilised by empowering existing providers to develop industry-wide professional development rather than creating new bureaucracies.

**(C) Are there any existing organisations that could fulfil this role?**

There is probably a range of organisations would be suitable to fulfil this role but again it comes down to the governance model that the DET and the sector decide is best suited. Organisations such as VELG, ACPET, etc would all be appropriate if they were willing and if there was an open tender process. Another argument is that ASQA take on this role so that there is no bridge between accreditation bodies and regulatory bodies. Further consultation and information is needed before we can make any valid recommendation here.

[Recommendation #9: see above](#)

## 5 - Models for a VET professional association

**(A) Which of the suggested models for a VET professional association would be considered most preferable and viable in the current VET environment? Model A,B or C?**

Anything is better than C. Again more consultation is needed and governance models and mandates established before we could give a solid recommendation however providing there is less focus on red tape and more focus on outcomes-driven solutions, we tend to side with Model B, having a limited number of national professional associations who are required to gain their accreditation through ASQA or DET. We also believe that Model A has some genuine value too, but without knowing what exact mandate the association/s would have, we can't elaborate.

**(B) What value would a VET professional association, or associations, add to the VET sector?**

See above comments in Section 4. Areas such as professional development, accreditation, standards, etc.

**(C) What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs?**

Initial trialling should be funded by the DET.

**(D) Should VET teacher and trainer membership with a professional association be mandatory or voluntary?**

In an initial trial, TAE practitioners could be required to gain membership and accreditation over a period of 12-24 months. This could be trialled as a mandatory process. Until more comprehensive costings and research into modelling and governance structures are provided, it seems appropriate to limit accreditation to TAE practitioners until a trial is conducted. From there, perhaps a long term solution is mandatory accreditation but there should be a voluntary option for non-TAE teachers.

[Recommendation #6: see above](#)

[Recommendation #9: see above](#)

## 6 - Capability Frameworks

**(A) What can be learnt or applied from the capability frameworks that have been developed or are currently being developed?**

- **Is there an opportunity to make better use of these frameworks, irrespective of proposals to develop a professional association?**

We don't have particular use for capability frameworks within our organisation. We tend to focus on the individual professional development of each teacher. In general, capability frameworks are only used by small groups of practitioners and not understood or ignored by the majority.

If we were to look further at the VET Practitioner Capability Framework, for example, it may be useful to help us plan professional development activities rather than using it as a prescriptive model within our organisation.

## 7 - Increasing industry confidence

### **(A) Are there alternative approaches not covered in this discussion paper on how industry can increase engagement with the conduct of assessment, but not specifically the validation?**

There are many different ways that RTOs already engage effectively with industry. Our RTO prides itself on having teachers with one foot in the classroom and another in the sector. They are constantly working on projects relating to their area of expertise – game art, game design, film visual effects, creative industries, programming, media, etc. Our teachers assist students to develop portfolios that allow the students to demonstrate their skills to potential employers. This is far more effective than other options such as graded assessment (which is incompatible with competency-based assessment, despite what academics plead – how can you be more competent than competent?).

After our students go into the workforce, many often return as guest speakers or “industry experts” to share experiences with current students and to conduct workshops and guest lectures. Our RTO does a good job in engaging with industry for assessment purposes, for example consulting with industry on the products and processes that students are engaged in completing for assessment activities. Ensuring that our teachers are genuine industry professionals also allows us to know that assessment events are aligned to actual industry tasks.

### **(B) Are there other ways to ensure industry confidence in assessment without requiring independent validation of assessment? For example, are industry-endorsed, externally administered tests a practical alternative to ensure that VET graduates are competent?**

- **What would be the benefits and drawbacks in requiring such tests? Under what circumstances would they be mandated, for example, for particular student cohorts? Should these be specified in training products?**
- **Who should regulate the tests?**
- **Should such a test be a pass/fail dichotomy, or would it be more important to use the test to identify gap training?**
- **Is the concept of an externally administered test, such as a test required before receiving a qualification, inconsistent with the premise of a competency based VET system?**
- **Should the results of tests be made public at the RTO level?**

One word: flexibility. It comes down to the integrity of assessment. If ASQA are auditing and monitoring from an outcome-driven perspective and they are effectively checking outcomes of students (along with the validity of assessment tools) then there should never be a need for externally administered tests.

So No No No to external tests!

Where will the essential contextualisation to meet industry needs occur?

The concepts of flexibility and contextualisation are critical aspects of a competency-based training and assessment model, and any attempts to introduce standardised or externally administered testing will not only be harshly opposed by the sector, but will not lead to any greater industry confidence in assessment.

One more appropriate method would be for ASQA to focus on outcomes rather than inputs as their key *modus operandi* in conducting auditing and monitoring activities.

[Recommendation #1: as above](#)

## 8 - The role of industry in assessment

- (A) What role should industry, for example, employers and industry organisations, play in validation of assessment? Does the varied interpretation of 'industry' inhibit a proper appreciation of the topic and should it be defined? If so, who would best define 'industry' when considering the practice of validating assessment?**
- (B) Do employers or industry groups have the skills required to fulfil this role in validating assessment? Is assessment such a specialised skill that industry and employers either do not want to get involved or should not get involved?**
- (C) Is there a need to build industry capacity and capability regarding involvement with training and assessment? If so, how might this be done?**
- (D) How can we ensure engagement with industry is appropriately targeted so it does not add undue burden and is targeted to those within industry with appropriate expertise required for validation of assessment?**

Industry has a significant role to play in ensuring that the VET sector in Australia is outcomes-driven, responsive to the needs of society and the economy, and prepares competent, job-ready graduates. RTOs find innovative and dynamic ways to engage with industry and it is up to each RTO to demonstrate how they achieve this. It is both a regulatory burden and a logistical nightmare to demand a "one size fits all" approach to how RTOs engage with industry, or indeed to define further what industry is. Industry is best defined as the workplaces that current students could be expected to be employed in the future.

The Standards allow for team validation approaches and this should be encouraged. A good validation process requires industry as well as the educators, but the approach taken to each validation should be considered. For example, engaging industry representatives in a "post-assessment validation" and review of submitted candidate evidence (i.e. the end product) would be beneficial, as the industry representatives can see what has been created and whether this reflects what is done in the workplace.

Our RTO has a structured policy in place for engaging with industry through campus-specific Industry Advisory Boards and through informal consultation with other stakeholders. Our teachers have strong industry links, with many continuing to work within their industry while teaching, therefore being able to provide feedback on the latest trends in the fast changing interactive entertainment industry.

Each RTO should have a clearly articulated industry engagement policy. Our Industry Advisory Board consist of current industry professionals, which forms the bulk of our formal industry engagement and validation processes, however we also engage with the industry as a whole through conferences, professional associations, informal conversations and product trials.

We don't believe that any changes are required to the current expectations of the role of industry in assessment. There are already decent frameworks in place and many RTOs are doing excellent work in engaging with their industry.

## 9 - Specific models (regarding the role of industry in assessment)

- (A) How can independent validation be best applied to avoid a 'one size fits all' approach? For example should independent validation of assessment be triggered by:
- improving RTO practice, for example, through a principles based model and best practice guide to support the VET workforce in identifying the most appropriate technique to validate assessment
  - mandatory requirement to lift quality in specific instances, for example, where a qualification is identified as high-risk
  - funding requirement, for example, independent validation of assessment could become a requirement for RTOs seeking to access government funding.
- (B) Should there be an increased role for external assessment by industry, and in which situations? For example, should it be mandatory for certain industries where there is a concern for public safety if a learner is incorrectly deemed competent?
- (C) If independent validation of assessment is to be risk-based, then what factors should be considered in the assessment of risk, for example, public safety, RTO profile, student cohort?
- (D) Should high-risk student cohorts be required to undergo independent reassessment of industry agreed sets of competencies before being issued with their qualifications?
- For example, particular qualifications; students undertaking qualifications with RTOs with high levels of non-compliance; or that conduct assessment wholly online or on-the-job; or in areas of public safety.
- (E) Would the burden be too great if independent reassessments were required for an entire student cohort, and should independent reassessment apply to a sample of students instead? If so, how could such a sample be chosen?
- (F) Who would be most appropriate to oversee the reassessment of qualifications?
- For example, could existing regulators or other organisations (such as firms that specialise in assessing students) take on this role?

Any decent RTO should engage with industry when developing and reviewing assessment tools. This, when documented and managed according to the Standards, is effectively an independent validation process. It is overkill to expect a formal independent validation process for every qualification an RTO has on scope. However, there are some circumstances where independent validation should be considered, for example when the regulator identifies industry issues with a particular qualification or training package, or where a qualification is deemed high risk. Seeking government funding should not require RTOs to go through additional layers of compliance given that their assessment tools should already be industry standard.

There is no need for independent assessment as a mandated regulation. If an assessor does not hold the appropriate training & assessment and vocational competencies, then they should not be permitted to assess in that situation. There doesn't need to be additional layers of governance and complexity added by expecting external assessment by industry. However, many qualifications expect certain periods of work placement, such as aged care and early childhood education, and in these situations, the industry contributes to the assessment process through third party reporting to the RTO/assessor on the candidate's performance.

## 10 - Industry expectations and graduate capabilities

**(A) Is there a role for Government or industry to develop resources outlining VET graduate expectations for particular training products? If so, who should take this work forward?**

- **Do higher order issues need to be resolved regarding terminology such as ‘competent’ (as assessed against the training product) and ‘job ready’ (ready to undertake all aspects of a particular job)? Is there a common understanding of VET system outcomes?**

The term “competent” is already well defined by the VET sector. We know the term “competent” to mean that someone is able to perform a particular skill or task to a minimum defined workplace standard. The old litmus test an assessor must ask themselves still applies: “would I employ this person if I was running a business” or “would I be happy with this person’s work if they reported to me”.

There may be room for more clearly defined VET graduate expectations for each AQF level. The descriptors of each level are written in legalese rather than plain English, and it would be helpful to get more clear information about the skill level, supervision requirements and autonomy of each AQF level.

## 11 - Evidence of assessment and graduate competency

**(A) Should the Standards for RTOs be revised to include strengthened and more specific rules around the conduct of and evidence to support assessment? Which elements that have a clear link to quality of student outcomes need to be strengthened?**

Yes. There is a lack of information from the Standards. Further information would be welcomed around many areas. One such area that provides significant confusion is the hours required for some courses. For example, a Certificate IV in Training and Assessment for us is 285 nominal hours but the volume of learning is 600-2400 hours. There is an almost ten-fold difference between the nominal hours and the upper limit of the volume of learning.

Ultimately, flexibility is an essential part of the conduct of assessment, and the important factor is that there is an appropriate mix of evidence that supports the candidate's competence.

**(B) Would a more prescriptive condition of registration, such as a requirement for RTOs to retain all assessment samples for a longer period, improve the quality of assessment?**

We are unaware of any evidence to support the notion that keeping assessment samples beyond the current timeframe will lead to greater transparency. However, as a whole it is not unreasonable to expect RTOs to retain assessment evidence for at least 5 years. Most RTOs store assessment evidence on their virtual learning management systems for some time after the assessment (some even indefinitely).

**(C) How could the focus of regulation move to evaluating assessment outputs, such as samples of students' assessment pieces, without incurring excessive costs or imposing excessive burden on RTOs?**

- **Is ASQA the appropriate regulator to oversee this function, or are there better placed agencies such as firms that specialise in assessing students?**

ASQA is the appropriate regulator. It is its job to regulate. They need to stop the focus on inputs (e.g. policies and spreadsheets) and begin to look at outputs - talk to students and graduates, do random samples of assessment work and, very importantly, retrain its auditors and adapt its culture to focus on outcomes. This may also require a tweaking of existing standards.

**(D) Are there other mechanisms that you would like to see added to the regulatory framework to prevent poor assessment? For example, should training-only RTOs be recognised as a formal part of the regulatory framework?**

Training-only RTOs are an interesting proposition, although it would seem more valid to not require registration at all - instead the RTO would be the organisation conducting the assessment, in partnership with a third party training provider. It would seem nonsensical to require a non-assessing organisation to gain RTO accreditation (just adds to the regulatory framework without providing any greater quality of assessment).

## 12 - Enforcement

### **(A) How could the focus of regulation move to evaluating assessment outputs?**

We have addressed (above) the need for outcome or output-based audit or evaluation approaches. Some options that spring to mind include:

#### Graduate outcome surveys for key qualifications

This could include qualifications such as Cert III in Early Childhood Education and Care and Cert IV in Training and Assessment. It provides quantitative data that a regulator could then use to identify RTOs or programs of concern for qualitative evaluations i.e. targeted auditing.

There are already a number of bodies within the sector that would be equipped to conduct such research and analysis, such as NCVER and ACER. The data could be processed and any concerning trends could result in notification to ASQA.

*[Recommendation #10: That there be consideration given to graduate outcome surveys for identified qualifications.](#)*

#### Involvement of industry in evaluating assessments

Where there is an identified concern with an RTO's assessment practices, industry can be engaged to assist in such evaluation. Industry representatives can provide feedback on whether assessment tools and evidence produced by candidates are reflective of industry standards for that particular skill or task being assessed. Industry feedback can also be sought as to the value of actual learner outcomes against the written assessment.

### **(B) Which additional regulatory enforcement options should be considered in dealing with RTOs providing inadequate assessment? For example, should the regulator have an explicit administrative power to require a RTO to arrange and fund external reassessment, or should additional civil penalty provisions be created?**

Regulators should have a number of tools available to them for enforcement. Unfortunately, most sanctions get bogged down in administrative reviews and there needs to be other options. Immediate temporary freezes on an RTO's enrolments, for example, is an option that would provide a wakeup call to many within the sector.

Whenever an RTO is found to have conducted insufficient assessment and the regulator administers external reassessment, this should be at the expense of the RTO.

### **(C) To what extent should the characteristics of the RTO influence the response? Should the size of the RTO or the number of students involved matter?**

No. As with any market-driven system, businesses (and any other RTO) takes on a risk when they enter the market. While it is essential that student places are protected by government guarantee, the characteristics of an RTO should not be taken into account when considering legal recourse for inadequate assessments.

### **(D) Given the need to balance procedural fairness with swift and effective enforcement action, what methods should be available to the regulator to manage RTOs that are repeatedly non-compliant with assessment requirements? How could such repeat offenders be defined?**

It does not seem unreasonable for ASQA to be able to order temporary suspension orders on RTOs from enrolling new students in a course where ASQA has serious concerns about the adequacy of assessment. The current risk based system needs to be revised in time as more audits are conducted with an outcomes focus.

**(E) What role should regulators have in communicating their activities and findings? Does current regulatory practice provide adequate transparency and disclosure, or are there other approaches that should be taken?**

Each RTO should be legally required to publish any findings from ASQA, including results of their audits. Such information should also be easily accessible from both the ASQA website and [www.training.gov.au](http://www.training.gov.au) as the obfuscation of this information can lull potential students into a false sense of security.

## 13 - Cancellation and Reassessment

**(A) Where inadequate assessment has occurred, should the power to cancel qualifications be exercised more frequently than it has in the past? What factors should affect this decision (for example, potential impact on public safety) and how should they be balanced?**

Unfortunately, when this occurs, the biggest losers will be the students who have participated in the training and assessment, only to have their qualifications revoked. There would have to be a serious and ongoing concern regarding an instance of inadequate assessment before the power to cancel a qualification is exercised. Qualifications that are deemed high risk or which contribute to public safety should be particularly reviewed for inadequate assessment practices.

**(B) Should a scheme for the reassessment of students be implemented? If so:**

- **Are there any situations where a student should not be offered the chance to be reassessed, for example, student fraud?**

If a student is found to have committed fraud or significant plagiarism, then there should not be a chance to reassess. Most RTOs reserve the right to expel or un-enrol students in such instances, as usually outlined in their student handbook.

- **Should there be a time period after which ASQA should not move to cancel an individual's qualification? Noting potential public and other safety issues, should a decision to cancel consider whether or not the person involved is reliant on the qualification for their current employment?**

There should not be any consideration given to the person's reliance on their qualification for their current employment. Expertise is often picked up on the job and students may become highly competent in particular role regardless of their initial qualification.

- **Who should bear the cost of reassessment and any gap training found to be necessary? If the cost is to be recovered from the RTO, should this be pursued regardless of the RTO's financial viability?**

If an RTO has conducted inadequate assessment, then any cost of reassessment and gap training should be borne by the originating RTO. This should be done regardless of the RTO's financial viability. It is the financial risk they take when they go into practice, and they should have sufficient professional liability and other insurances to cover themselves in any case.

- **Who should deliver the reassessment? Are there any circumstances in which it would be appropriate for the original RTO to undertake the reassessment?**

If ASQA or other regulatory body were satisfied that the original RTO had implemented any necessary changes to lift their standard of assessment to an adequate level, then this should suffice. However if ASQA has moved to the point where they have demanded a reassessment, such an expectation could be difficult as the original RTO may have more complex issues such as workplace culture.

- **What should the qualifications be for those doing the reassessment, and what industry experience and currency would they need? To what extent should ASQA, industry or employers be directly involved in the reassessment process?**

A reassessment is another type of assessment; it therefore stands to reason that anyone who is eligible to assess a qualification should also be able to conduct a reassessment. Standard industry and employer engagement would occur in the process (as for any assessment activity) and ASQA should provide support to the assessor/s conducting the reassessment.

**(C) Should a tuition assurance fund be set up to further protect students in Australia's VET sector, particularly in the context of any scheme of reassessment or cancellation of qualifications? Should membership be mandatory for all RTOs? Who should operate such a fund, and who should bear the cost of its operation?**

This would be another significant cost for many smaller RTOs to carry, especially when media reports suggest that the majority of unscrupulous providers are larger RTOs. No this sort of fund should not be established. Instead the other proactive measures emphasised in this paper should be adopted.

**(D) What linkages with income support eligibility should apply for graduates impacted by any recall of qualifications?**

None. If a reassessment and gap training occurs, this should not be at the graduates' expense, and they would (re)gain the qualification. The DET should look at methods to recover student fees (VET FEE-HELP or otherwise) from RTOs who have qualifications recalled.

## Conclusion

This submission represents our organisational response to the Department of Education and Training's *Quality of Assessment in VET* Discussion Paper.

We, like many other high quality providers of VET in Australia, have a strong interest in a robust, dynamic and well-regulated VET sector.

In order to meet the government's desire to improve the quality of assessment in VET, the focus needs to be taken off increasing regulation and there needs to be a fundamental and philosophical shift in the nature of regulation to an outcomes and output based model. This is where quality (good or bad) will be found. This is where the regulators can be most effective. Regulators need to be quicker to sing the praises of high-performing RTOs just as loudly as they notify the media of low-performing RTOs.

The ongoing survival of Australia's skills and economy depends on smarter regulation, not more regulation.