



Template for submissions to the *Quality of assessment in vocational education and training – Discussion Paper*

Key consultation areas

The Department of Education and Training (the department) seeks stakeholder input on the *Quality of assessment in vocational education and training – Discussion Paper* (the discussion paper). The paper covers the following broad themes to improve assessment in vocational education and training (VET):

Chapter 1: Foundation reforms

- ensuring the requirements for VET teachers and trainers provide the strongest platform for high-quality assessment
- ensuring those teaching VET skills are highly competent professionals with high-quality, contemporary skills in assessment.

Chapter 2: Reforms to the assessment of VET students

- assuring the quality of assessment through industry engagement with assessment review and control mechanisms as a gatekeeper before qualifications are issued
- ensuring employers have clear and realistic expectations of VET graduate capabilities which align with the assessment of students.

Chapter 3: Reforms to the regulatory framework

- improving the detection of poor quality assessment
- ensuring quick action can be taken against registered training organisations (RTOs) delivering inadequate assessment
- managing the consequences of inadequate assessment by removing invalid qualifications from the system where necessary and supporting students if this occurs.

How to provide feedback

To support the Training and Assessment Working Group to provide the Australian Government Minister for Vocational Education and Skills with recommendations on how to improve assessment, stakeholder consultations will begin with the release of the discussion paper in January 2016 and continue through to Friday 11 March 2016.

Respondents may provide feedback on some or all of the discussion paper's themes. To assist with the compilation and analysis of the views of all stakeholders, respondents are encouraged to provide feedback via this preferred submission template, with attachments as required. Submissions in alternative formats will also be accepted.

All written submissions to the discussion paper and queries on the consultation process may be directed to the department via email at trainingpackages&VETquality@education.gov.au.

All written submissions will be made publicly available on the department's website, unless respondents direct otherwise. See the [terms and conditions for public submissions](#).

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 Yes No website or otherwise be made publicly available?
 - 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.

1. Discussion questions – RTO limitations:

- 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?
- Should RTOs be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors?
- 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?
- 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?
 - Should the TAE Certificate IV and/or Diploma require a practical component? If so, how long should the practical component be?
 - 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?

COMMENT:

- Completing a TAE qualification may be appropriate for trainers who deliver units of competency in a workplace, such as professional development, but not all VET course content can be reduced to mere units of competency. For example, the assessment of quality, long-term interactions and conversations with others, especially with those who are vulnerable - young children, the aged and people with a disability - requires careful observation by qualified, skilled and experienced observers during extended placements/practicum.

This also applies to RTOs delivering TAE courses. Interactions between TAE students and those whose learning they will be responsible for need to be observed. Thus, a practical component is essential. This component would best be completed over a period of weeks - perhaps one, two hour lesson each week. This would enable the assessor to judge if there were positive behavioural and attitudinal changes in the student's interactions as well as improvements in the student's lesson planning, preparation and implementation over time.

- The idea that 7 to 10 days exposure either face to face or online can equip TAE students with all the skills, knowledge and understanding required for them to 'teach' VET students is unrealistic.

As with RTOs offering VET courses, those offering TAE qualifications need to employ qualified, skilled and experienced teachers and provide high-quality education to ensure quality of graduating students.

- As far as RPL is concerned, there are many qualifications and skill sets that can be granted providing they are within a specified time limit. However, qualitative and attitudinal characteristics such as those involved in interacting and talking with others, especially at a sustained level as in the 'care' industries, can only be assessed by careful and extended observation.

2. Discussion questions – skills and qualifications of trainers and assessors:

- 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?
- 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?

COMMENT:

Designing and developing **valid and reliable** assessment tools are critical components of the education process and should be a core unit. Without assessment, teachers and society cannot know what the student has learnt. Assessment is also, of course, a valuable feedback tool for students.

While the focus here seems to be solely on assessment, this is only the 'back end' of education. The skills, knowledge and understanding students are required to learn are the 'front end'. So what will improve the outcomes for TAE students is relevant and appropriate course content, the employment of qualified teachers and valid and reliable assessment.

The implication in this discussion question is that a (very) short Certificate course can equip only new TAE entrants and that the Diploma course is more appropriate for more experienced entrants.

Updates to this course should be made according to what it is that students need to learn in order to be able to train others effectively. This would involve developing a capability framework as well as identifying any attitudes and understandings that students need to develop. Those organisations employing trainers and the trainers themselves are best placed to provide feedback on the effectiveness of their trainers but, in order for organisations to demonstrate this, they need to design, develop and implement **valid and reliable** evaluation tools of their own. The belief that training is effective is neither valid or reliable.

3. Discussion questions – benefits and purpose of a VET professional association:

- 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?
- What are the barriers to establishing a national professional association? How could these be overcome?
- What would be the most useful guiding purpose of a national professional association?

COMMENT:

It would seem essential to have a funded national professional association to establish the qualifications needed for the VET workforce, to accredit providers and to monitor the quality of providers and of the VET workforce. Quality assurance is costly and requires funding.

As with most national organisations, the major barrier would be the competing interests of providers, states and territories.

4. Discussion questions – potential activities of a VET professional association:

- 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?
- 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?
- Are there any existing organisations that could fulfil this role?

COMMENT:

All of these would be beneficial, especially the registration of VET practitioners. As training.gov.au has such an integral and critical role in VET, it could be the umbrella organisation under which a professional association could be located. Skills Australia might also be a possibility.

5. Discussion questions – models for a VET professional association:

- 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?
- What value would a VET professional association, or associations, add to the VET sector?
- What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs?
- Should VET teacher and trainer membership with a professional association be mandatory or voluntary?

COMMENT:

Model B seems robust and straightforward. However, after experience with the NSW Institute of Teachers, Model C is also appealing. Regardless of which model is implemented, VET practitioners should be required to either register or join or do both. This would encourage greater confidence in them by employers, industry and society.

6. Discussion questions – capability frameworks:

- 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?

COMMENT:

Capability frameworks certainly have their place but they don't and can't encompass all student learning, especially where attitudinal change is critical.

7. Discussion questions – increasing industry confidence:

- 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?
- 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?

COMMENT:

Employers and industry should not have to engage with assessment itself other than to provide feedback as to whether the graduating workforce has the requisite skills and knowledge. Their involvement should only be required at the course development stage. If RTOs employ qualified, experienced teachers, kept up-to-date through a systematic program of professional development, employers and industry should not have to be involved at the assessment development stage.

Increasing industry confidence begins with course content and ends with valid and reliable assessment.

8. Discussion questions – the role of industry in assessment:

- 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?
- 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?
- Is there a need to build industry capacity and capability regarding involvement with training and assessment? If so, how might this be done?
- 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?

COMMENT:

It is doubtful that employers and industry groups have the expertise required to validate assessment although they can very quickly recognise the failings of a training course. They should be able to rely on the RTOs to produce a qualified and skilled workforce. In order for RTOs to offer up-to-date and robust courses, they need to liaise with employers, industry groups and, where possible, some of their graduates, on a regular basis.

The only time these groups should have to be involved in implementing assessment or evaluation is when determining the effectiveness of in-house training.

9. Discussion questions – specific models:

- 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.
- 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?
- 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?
- 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.
- 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?
- 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?

COMMENT:

Assessment starts with the assessor. If the assessor doesn't have the skills required to develop valid and reliable assessment tools, then any assessment they develop is useless.

From my own experience with students from some RTOs, it was obvious that they hadn't been taught the requisite skills, knowledge and understandings for the occupation, let alone assessed on them. This required intensive catch-up, gap teaching as well as lengthy discussions with providers.

Validation of assessment should be ongoing, especially for new and problematic RTOs. This should improve RTO practice. Occasional and random on the spot monitoring of RTO assessment practices and independent assessment of an occasional student are critical if the award granted to the graduating student is to be worthwhile and a genuine indication to employers, industry and society that it is warranted and deserved.

Implementing an accreditation system similar to that of ACECQA for early childhood services could be one way to reduce the frequency of the need for assessment validation. Those services accredited at a higher rating (e.g. Excellent or Exceeding the National Quality Standard) do not have to be accredited again for a certain number of years. These services take great pride in their accreditation success and ensure that they maintain or upgrade their status next time round. Those services with lower ratings (Meeting or Working Towards the National Quality Standard) are rated again sooner.

10. Discussion questions – industry expectations and graduate capabilities:

- 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?

COMMENT:

Industry has to be involved in course development. This is really the only way to avoid a mismatch between what is required by employers and industry (and society) and what is provided by an RTO. RTOs don't exist for their own sake - they provide training for society's workforce and must ensure their course offerings remain relevant, appropriate and up-to-date. Providing plain English descriptions of courses to employers and industry isn't the answer to any dissatisfaction they may have with the capabilities of graduates from a course with inappropriate content.

11. Discussion questions – evidence of assessment and graduate competency:

- 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?
- 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?
- 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?
- 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?

COMMENT:

Any strengthening of RTO Standards is good. The tighter the better. Valid and reliable assessment is the only way employers, industry and society can have confidence in graduate capabilities (assuming course content is relevant, etc.). Truly random sampling of students' assessment pieces along with occasional independent student assessment by ASQA would lift assessment quality. ASQA already has the necessary requirements and overview to undertake this.

12. Discussion questions – enforcement:

- How could the focus of regulation move to evaluating assessment outputs?
- 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?
- 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?
- 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?
- 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?

COMMENT:

Enforcement certainly has an important place in regulating RTOs and publicising details of the findings more swiftly might inhibit the unacceptable assessment practices of some rogue RTOs. However, as with most things, prevention is better than cure. Requiring random samples of student work from RTOs and implementing occasional on the spot testing of individual students right from the start of a course, while time consuming, would improve confidence in graduate capabilities and inform all RTOs that student assessment is a serious and critical part of teaching.

13. Discussion questions – cancellation and reassessment:

- 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?
- 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?
 - 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?
 - 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 RTOs financial viability?
 - Who should deliver the reassessment? Are there any circumstances in which it would be appropriate for the original RTO to undertake the reassessment?
 - 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?
- 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?
- What linkages with income support eligibility should apply for graduates impacted by any recall of qualifications?

COMMENT:

Students who have not been properly assessed need to be reassessed by an independent body such as ASQA. This is the only way that employers, industry and society can regain confidence in the VET sector and in the graduates it produces.

Reassessment could be offered either by ASQA or by skilled and experienced teachers in reputable RTOs (such as TAFE). Hopefully, ASQA would become aware of any inadequate assessment early on and implement strategies to correct this. The national body could be responsible for the fund and, by doing this, would be able to oversight any problems and develop strategies to reduce the incidence.

Costs of gap training and reassessment should be recovered from the RTO wherever possible or, if not, funded by the above suggested 'tuition assurance fund'. As well as all RTOs being required to contribute to this fund, new or problematic RTOs should also be required to put in additional funds until such time that their credentials are demonstrated.