



Australian Government

Department of Education and Training

## 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](mailto: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 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.

## 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:

1. There should be a limitation to the number of the RTO's delivering TAE with an accreditation process to be undertaken to ensure that the RTO meets the required timeframes to achieve competency and the correctly qualified trainers/ Educators are delivering the TAE
2. No RTO should be issuing their own staff with TAE – This I would consider to be a conflict of interest
3. RPL/ RCC or CT should only be appropriate in the full context where there is other qualifications (such as a teaching degree) evident and its required for a particular industry (which unfortunately there are a few still who don't recognise higher qualifications such as a degree in education within the VET sector). In our experience we have yet to have anyone who has come to us as an RTO for RPL/ RCC or CT who haven't had to do some sort of gap training
4. Yes – see part 1 in regards to the accreditation process for delivering TAE. I also believe that there should be a significant component in regards to practical components delivery within the TAE that encompasses all components of the TAE not just delivery as well as moderation of the assessments undertaken by the candidates. This will improve the quality for the TAE candidate being churned out and people may actually be able to train and assess people within an appropriate manner and to a level that is required and expected within the

VET sector. Diploma should only be delivered to people who have proven experience within the industry for a period of time as it is a higher level of competence and assumed knowledge that is evident within the assessment components for that qualification which I would consider to be difficult to be able to effectively undertake without the experience required.

## 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:

1. Most Cert IV TAE qualified trainers are not designing nor developing their own tools but may be involved within this process to some degree. They do not have the knowledge nor inclination in many cases to do this so I would consider it to be a specialist unit but a unit on understanding and assisting in the process of the development of assessment tools may be appropriate. We need to keep in mind what a Cert IV TAE qualified person is likely to be undertaking within the VET sector a Diploma or higher qualified person within the VET sector is undertaking.
2. It should be a majority consideration but with an emphasis on what the key stakeholders have to say as well. The VET sector doesn't want burned out teachers as the only applicants for the roles within the sector but we also need to acknowledge that many people working within the VET sector do so because its working with the Adult Learners who have different needs to what our traditional education based systems have and this is something that is not acknowledged nor respected by many with tertiary qualifications within education who haven't been exposed or are not interested in this sector. Again it comes back to being very clear in regards to what our expectations are within the sector with all parties involved.

### 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:

1. Yes I believe that there is a need to have a national professional association for VET but I don't believe the government should be involved unless it forms part of the Teachers Association for example. Then it should be like AHPRA is for health professionals and only be the registering body
2. Resistance from the sector in recognising that the VET sector is as professional as tertiary qualified teachers but I believe that this can be overcome
3. Registration, regulation and similar roles as AHPRA who have already done this process and relatively successfully

#### 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:**

1. All of these
2. Consistency and professionalism
3. Not that I am aware of – maybe the teachers registration board

## 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:

1. I feel I need more information on model A and B to make an informed decision and can see issues within the sector if model C was undertaken without consideration on capability and governance within the VET sector
2. There would be significant value added to the profession of VET sector trainers with an association governing them
3. Membership fees from the individuals due to the complexity of the sector and some trainers going across multiple RTO's but also possibly an understanding of some sort from RTO's only to use registered trainers within their organisations as part of the accreditation process for RTO's
4. Mandatory otherwise it won't work



## 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:**

1. Consistency and professionalism required regardless of the professional organisation development

## 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:

1. Workplacement is already undertaking this for organisations who ensure that their students undertake one and facilitate their students while on placement – these industries work closely with the organisations and are happy to have repeat students because they are involved within the process but this takes time, money and commitment from all parties
2. This would be too difficult to undertake across many sectors and it comes back to a compulsory work placement and experience and looking at the finalisation of students and employment outcomes may be the only way to undertake this

## 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:

1. Same at question 7.1
2. No many employers or their representatives don't have the skills, time, money or commitment to the validation process in many sectors
3. It would be nice but am unsure as to how it would be achieved
4. Same as above

## 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:

1. I feel it would be too difficult given the multiple qualifications and the vast array of skills, industries etc to get a 'one size fits all' model
2. Some qualifications already have an external validation component based on licencing requirements but this wont fit other qualifications and this should then come back to industry representation and collaboration between the RTO and the industry and how this is shown within the training and qualification process with evidence based practice being required
3. Who defines a high risk student and I would have assumed that ASQA as part of their processes in addressing concerns with RTO's would be ensuring that they are meeting the requirements to redress these issues and ensure students are not put at risk
4. Samples of students and evidence of industry representation and collaboration as per 2

5. Potentially part of the new skills councils or such could take this role on – I am reluctant to provide work for assessments done by a firm who specialise in this due to past experiences of biases and other unscrupulous behaviour being evident and the lack of transparency being shown by organisations who use this method to tout for business

## 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:

1. Yes I feel that this would be beneficial and again could form part of the new skills councils roles to clarify and work with industry in regards to this

## 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:

1. Yes this would be beneficial for some and clear the grey areas
2. I would be more concerned as to whether the assessments have been moderated and to what standard and evidence of this occurring rather than the length of time
3. I feel it needs to remain with ASQA or government departments for the reasons outlined in 9.5. Given we live in the digital age then costs should not significantly increase for many RTO's but again evidence of the moderation process is required as part of this
4. I'm unsure as to how you can train only without having an assessment requirement in mind to some degree otherwise you are training for the sake of training

## 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:

1. There needs to be more of it but I'm unsure by whom (ie ASQA or state departments in regards to funding)
2. Yes
3. Size should not matter – it's the student that counts and that should be all that matters as we do not want ill prepared or unsafe students being given qualifications
4. Removal of RTO status or sanctions
5. Publish them and allow the students to make their own minds up



### 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:

1. Yes but allow the students to do what is required to keep their qualifications as part of the process
2. If a student is found to be fraudulent then they should be pursued as per the law for fraud with the RTO being supported through this process. If its an RTO issue then the RTO should be allowed to work under sanctions to redress these issues within a stringent time frame with support/ supervision from the department to ensure that it occurs and bear the costs of the process for failing to maintain the standards that are required of them as an RTO
3. ACPET already does a tuition assurance fund that many RTOs are part of so why do we need another one
4. This is a legal question that I am unsure as to the best response to this as it will be dependant upon the extent and reasons behind it