



## 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: 

REDACTED
3. Organisation (if applicable): 

REDACTED
4. Please indicate your interest in this discussion paper: 

Industry Representative/ RTO

(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:

- The number of RTO's should be reduced and the qualification itself have more prescriptive, consistent assessment guidelines. We have had trainers who have completed the course in less than 6 weeks and are not competent to deliver and assess training.
- RTO's should not be able to issue TAE qualifications to their own trainers as this would be a questionable practice. In order to meet compliance I would suggest that in the best interest of the candidate and the organisation external validation of the competency would be more transparent.
- For experienced trainer assessors with a minimum 2 years currency or equivalent, I believe that there will be good candidates for an RPL process.
- RPL that meets all the rules of evidence and is documented accordingly, is not the issue. Poor recording of evidence is more the problem
- More rigid and prescriptive guidelines for assessment similar to the CHC package would assist greatly.
- VET practitioners who hold a Diploma or higher qualification and have currency would be the ideal.

- A minimum of 40-50 hours practical where the candidate would demonstrate their training / assessing ability. They should be required to conduct in as a one on one and in a group. This will ensure understanding of the different types of learning styles, the complexity of adult learning, education and group management. Rules of evidence and flexibility or situations. Employment history in VET or equivalent would be useful but if the course was trained and assessed with rigour and integrity and had practical hours in excess of 100 then going straight to the Diploma would be fine.

## 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:

- A solid understanding and capability to design and improve on assessment tools would benefit from the entry level trainer assessor.
- The unit if assessed with rigour, would meet the requirements.
- A new unit for the Diploma, with the current unit *TAEASS502B Design and develop assessment tools* as a pre requisite would be useful.
- Stakeholders in some cases will be the RTOs delivering this qualification and they may be a little biased. The demand for this qualification from within organisations has seen a significant increase in numbers. It can also be said that the currency and delivery for these graduates is sometimes sporadic. If you can deliver a bare minimum, assess without rigour to a large number, then from a dollar perspective your view may be a little tainted.
- In line with experience in other qualifications, people want the quickest easiest way to obtain a qualification. I also think employers who may require the qualification may not have the depth of knowledge to understand the quality of what they are paying for.
- I believe that there are benefits when undertaking higher level qualifications e.g. Diploma to having a minimum of a year in the sector. For others required minimum practical hours would be preferable.

### 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:

- I am unsure that another professional body would be necessary.
- We currently have peak professional bodies and I am unsure what another one would supply to the mix.
- The current professional peaks do speak to government, supply ongoing training and endeavour to ensure quality practice by leading by example
- Promoting high standards and ensuring professional excellence is part of the role of the regulator.
- A professional body would require checks and balances about those who are registered. Ongoing re accreditation and another regulatory authority to add to what is a heavily regulated sector. A direct link between ASQAs compliance and registration and the registration of professionals may assist.
- In order for the community to trust the sector we need to ensure transparency in practice and that the powers of the regulator are vigorous.

#### 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:

An extension of ASQA's capabilities to include this function. They are neutral and have no vested interest in allowing poor practice.

Perhaps the ITABs would be useful as they are neutral and yet engaged closely with most RTO's, and industry in their state and territories.

#### 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:**

Do not feel that another National professional association is required.

## 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:**

There is still an inconsistency in the framework that is not black or white but open to interpretation

## 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:

The standards are very specific in outlining the necessity of currency and engagement with industry. This should be documented and checked upon.

Memberships of ITABs who are a more frontline independent organisation that could continue to be a voice on behalf of the industries they represent.

No I do not believe that external tests is practical or necessary.

Benefits – checking up on integrity of the RTO and student knowledge ( already regulated)

Drawbacks – already standards in place to ensure integrity, Student confidence, flexibility, meeting the rules of assessment

Pass/ fail does not demonstrate competency in a range of situations, range of circumstances, range of learners

YES it is inconsistent

## 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:**

The relevant sector can give some strong insight into ever changing ideas and influences in the sector.

RTOS cannot hope to be relevant within the training provision unless they engage with those at the "coalface"

Employers struggle unless they have training and assessing experience as to whether the assessment meets the criteria or the rules however, they can indicate if it fits the current job role and expectations of the sector.

There is always a lag time between how sectors progress and the training assessment outcomes.

For some sectors this may work but for others it is a costly burden.

Unless they have a qualification in training and assessment the targeted people should have input and if explained and recorded properly they can influence wording , terminology adaptation etc.

## 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:

A risk based approach with risk level applied would be and has been effective in use.

The risk ratings would be attributed to likelihood of personal injury, likelihood of damage to an organisation and the risk of an inexperienced trainer/ assessor should all be rated

The ITAB could assist with the external validation

High level non-compliance is problematic but more importantly online students where identification checks are not strict, should require stringent and rigorous safeguards

Reassessment would be problematic and costly, however if there is potential high risk – high likelihood it would be a necessity

## 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:**

Due to the ongoing changes and innovations within sectors this would be costly and difficult to manage to be of any benefit.

This should be explained in documentation provided and also verbally with the employer or industry.

## 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:**

Prescriptive assessment guidelines in some cases are workable however what is evident from the CHC training package is that writers of the package have not taken on board the ability or rules of evidence when determining the prescriptive guidelines. This in turn is causing industry and student and RTO problems that take a very long time to address and have changed.

One regulatory body like ASQA is preferable to competing organisations.

Flawed qualifications may also have a broader impact on public confidence in nationally accredited training and the reputation of Australia's VET sector.

RTOs need to be capable in themselves as well as have capacity to do both. The rules of evidence and assessment are much more easily applied if looked at holistically.

## 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:**

The employer and industry are able to generally evaluate training and outcomes as they will ensure they apply to job outcomes and required capability.

Depending on circumstances and how large group or cohort is and what the findings reveal penalties may be applied. For integrity in assessment it would be comforting to ensure that the student capabilities matches the national benchmarks so external testing may need to occur.

Size of the RTO and ongoing issues would need further investigation.

Suspension of registration depending on severity and numbers should be applied.

Suspensions should be applied more often to protect students and the public.

Tuition assurance to protect students and employers should be mandatory once the student numbers /dollar figures reach a certain benchmark.

ASQA should publish it as a non-compliance and penalise accordingly.

### 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:**

Tuition Assurance and similar insurance should be mandatory to protect students who in good faith have engaged and paid for training. External RTOS who can assist and are preferred providers through an insurance scheme would be of assistance to the public.

Students should not bear the cost of RTOs ineptness. Student confidence is based on the registration and compliance within the standards of ASQA. If there was mandatory insurance then gap training or reassessment would be an inconvenience but not a financial burden.

Depending on the extent of student fraud i.e. did they understand, did they do it knowingly and were they identified and advised? Inadvertent plagiarism and lack of understanding is still fraud but in the first instance we would check the facts before failing.

If a qualification is issued and it fraud is identified, then yes the qualification should be cancelled.