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.

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: [x] Individual   [ ] Organisation

2. Full name: REDACTED

3. Organisation (if applicable):   REDACTED

4. Please indicate your interest in this discussion paper: RTO, VET Practitioner

    (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?   [x] 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   [x] 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:

This suggestion breaches access and equity principles to suggest that only a limited amount of RTOs should deliver the TAE qualifications or skill sets. If proper audit and review processes are in place there should not be a restriction of how many RTOs should deliver these qualifications.

Why just pick on qualifications from this training package, what about delivery of all qualifications and skills sets? Training and assessing across these different standards needs to address all stated requirements. Unfortunately there are a few RTOS who do not deliver these courses to the required standard, however there are also some students who successfully achieve the required standard and then do NOT continue to apply these standards once they are qualified. How can you control this?

Having a trainer/assessor having to hold a degree or higher qualification really does not make sense. The majority of 'workplace / industry skill trainers' are exceptional at training, however they may not be academics or wish to be. The ability to pass on information and support to students so they achieve their goals are specific skills that not all people possess. Academics love to study. Trainers love to teach.   Perhaps a way to work with this is to introduce a Certificate III in training and assessing, which is only based on skills required for workplace trainers. At this level they would not need skills such as: developing assessment tools, validating assessment tools, developing learning

programs. Having a Certificate III in training and assessing should be a 'train the trainer' type qualification. Not all workplace/trainers need to hold all skills identified in the current Cert IV in training and assessment. The majority of workplace/ industry skill trainers are exceptional trainers and assessors, but they do not wish to participate in other more specific roles that are considered to be more administrative and beyond the needs of their workplace or role.

In my experience, I have come across quite a few trades people who have been injured and unemployed. Their only option was to gain the Cert IV in training and assessment and

Teach others the skills they cannot longer make a living out of. These people are unemployed and not able to find a workplace that they could work at without the qualification. We provide simulated environment and they use family and friends to participate in 'practical' experience. Any changes made to the 'practical' component needs to ensure that it does not impact on those not in a position to work in a RTO or training organisation.

I cannot see how you could gain the Diploma within the VET /TAE training package WITHOUT having been or currently employed in a training organisation. It is just not possible. This should and does form part of the expectations to be able to achieve the outcomes of the diploma level qualifications.

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:

Wow, had a bit of trouble understanding your lead in to this one!!

No, this is not a good decision for the TAE Cert IV in training and assessment, as per my discussion above, this is more an administrative role that some really effective trainers do NOT have or do not need.

The majority of 'workplace / industry skill trainers' are exceptional at training, however they may not be academics or wish to be. The ability to pass on information and support to students so they achieve their goals are specific skills that not all people possess. Academics love to study. Trainers love to teach. Perhaps a way to work with this is to introduce a Certificate III in training and assessing, which is only based on skills required for workplace trainers. At this level they would not need skills such as: developing assessment tools, validating assessment tools, developing learning programs. Having a Certificate III in training and assessing should be a 'train the trainer' type qualification. Not all workplace/trainers need to hold all skills identified in the current Cert IV in training and assessment. The majority of workplace/ industry skill trainers are exceptional trainers and assessors, but they do not wish to participate in other more specific roles that are considered to be more administrative and beyond the needs of their workplace or role.

All stakeholders should be involved in this discussion not just a few targeted individuals. There are to many different cohorts and contexts for consideration here.

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:

No, not necessary. There are many valuable organisations addressing this need already. Government bodies should monitor and develop policies and standards. Perhaps they could endorse or provide links to organisations that are already delivering sound PD sessions?

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:
NO….

There is enough red tape for RTOs and VET trainer to go through already, please do not instigate even more red tape and hoops we need to jump through. Enough is enough!!!!!

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

- Which of the suggested models for a VET professional association would be considered most preferrable 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:

I cannot see a link to your suggested Models of A, B or C??

I do not endorse the suggestion of a VET professional association.

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 appears to be too many frameworks that quite often do not appear to understand the others roles. Changes are made constantly to portfolios, website, links, etc. based on changes made to portfolios and ministers. Example: Currently on training.gov.au some of the industry training packages do not reference who to contact if you wish to query any of the packaging rules or interpretation of the components due to changes from ISCs to SSOs. (http://training.gov.au/Training/Details/BSB and http://training.gov.au/Training/Details/TAE)

- 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:

NO….why qualify a trainer/assessor and issue qualifications to students and then get them to have to undertake further testing. You need to have faith in a system that is audited and reviewed against specific standards constantly!

As stated previously….. Unfortunately there are a few RTOS who do not deliver these courses to the required standard and ASQA appears to be successfully catching up with these organisations. However there are also some students who successfully achieve the required standard and then do NOT continue to apply these standards once they are qualified - how can you control this?

Perhaps a continuing education system could be implemented for trainers that every 2 years they need to provide information as to the courses they have delivered and the PD they have undertaken? This is what Cert III and Cert iV fitness professionals need to do.

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:

Industry is a very broad term! Majority of employers would not understand the concepts of assessment tools and validation. Feedback from these cohorts is important to measure if the training has improved performance, etc., however a lot of students are NOT employed when they undertake their qualifications.

The best way for this to work is for RTOs/organisations to maintain their own industry experts, which could include trainers/ other RTOs/ employers/Apprenticeship bodies, etc., which are relevant to their delivery mode and scope. This is NOT a one-size fits all answer.

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:

Again, what outcomes are you looking for here and why?

What is the problem that you need to incorporate all these stakeholders in a validation of assessment processes? What problems have been identified? If this a trainer problem, a RTO problem, a student problem – after training and achieving their qualification they do NOT apply the appropriate standards. What is the problem identified here?

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:

Do you mean a 'code of ethics' for trainers? YES.

Terminology is always a problem in any industry. Provide a glossary that is updated annually for all trainers/students to access.

Some really problem areas I come across with students in understanding the following terms.

a) Why are training packages called 'training packages'…there are no' training' package information associated with them!   They should be called 'Industry Standards or Industry Qualifications.

b) Why an 'assessment tool', would it not be easier to understand if it was just called 'Assessment process'.

c) Why 'Assessment instrument' – it would make more sense if it was just called what it is: 'Assessment Tasks'?

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:
Are you serious!!! Did we not just update the standards again last year after changes the year before? Enough!!!! Seriously, lets give them a chance first.

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:

Lets just have ASQA the national body do what they do best…regulate, review and audit. They appear to have sorted out some of the dodgy operators, so it must be working, right?

How much red paper and hoops must we jump through, this is a very regulated industry now.

Continued non-compliance that is of a high risk should involve de-regulation. 2 strikes and you are out!

RTOs that have been de-regulated should be named on the ASQA website including the reason for de-regulation. Especially if other RTOs have to apply national recognition for qualifications that have been issued by the deregulated RTOs.

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:

I feel that if a RTO has some questionable non-compliances of a high risk or the areas of non-compliance involved the assessment tools they were using or inadequate qualifications and experiences of trainers, they should be audited again within a 16 month period and not the 5 years normally indicated. This should be payable by the RTO.

Perhaps an option to cancelling a qualification immediately should be preceeded with the option for the student to provide additional evidence against the areas that have been identified as not being addressed first? This would need to involve another RTO if the responsible RTO was deregulated. This is a bit of a problem area, that needs to be addressed, especially if the qualification/skill set included risk management, use of equipment or skills that involed high risk areas, it certainly needs to be addressed.