

## **REDACTED**

### **Quality of Assessment in vocational education and training – Discussion paper**

The following comments are from staff within the **REDACTED** and directly relate to the discussion paper questions.

## **Chapter 1 – Foundation reforms**

### **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?

The number of RTOs is unrelated to quality. Whatever mechanisms would be used to ensure 'high quality provision' by a few can be applied to ensure high quality provision by many. For example, some of the mechanisms described in this paper.

However, having a proliferation of deliverers makes regular audits difficult. With a specified number of quality providers the process of audit could be intensified.

- Should RTOs be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors?

Yes. Otherwise RTOs may perpetuate invalid assessment practices. The recent NASWD-Independent Validation of Assessment Pilot Project revealed an instance of this. In the Certificate IV TAE pilot implementation, the RTO which showed the highest number of issues was also an RTO where the TAE portfolio area doubled as the RTO's centre for teaching and learning – providing professional development (PD) and expert advice to all RTO staff. Therefore, the validity issues identified by the external validation may have been disseminated throughout the organisation. If trainers and assessors undertake their CIV TAE training at another RTO, they may bring back new ideas and practices to their organisation.

- 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?

The lack of validity of RPL practices in the VET sector has been documented. There is no reason to expect that the CIV TAE is immune to these problems. If independent assessment of qualifications is used then this could solve RPL issues.

- Should the practice be restricted?

No. The practice should be quality assured. RPL is an assessment-only pathway to a qualification. Assessment in the Australian VET sector is criterion-referenced – it collects evidence that a candidate can demonstrate a set of specified performance criteria. This means that assessment can easily be separated from training delivery. However, in RPL assessment the assessor does not have the usual opportunities to

collect a body of assessment evidence along the way while delivering training over a period of time. Therefore, the assessment in an RPL process needs to be more rigorous than in other pathways. In particular, the authenticity of evidence needs to be assured. If conducted appropriately, RPL is a valid way to achieve a qualification within a competency-based assessment framework.

- 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?

Yes, but must be qualified at least one level above what they are teaching as the TAE must be elevated in value and integrity.

- 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?

University-level qualifications would be suitable if there are universities providing appropriate qualifications in the area. Note that Primary- and Secondary-School teaching qualifications are unlikely to be fully fit for purpose.

- Should the TAE Certificate IV and/or Diploma require a practical component?

Yes.

- If so, how long should the practical component be?

It should align with the practical component of other teaching qualifications. As a guide, a one-year postgraduate Diploma of Education (Secondary) requires a 60-day practical component.

- Should entrants to the TAE Diploma be required to demonstrate employment history in the VET industry before being issued with the qualification?

Yes. The entry requirement should be a CIV TAE plus a specified amount of post-qualification work experience.

- Would this condition help to improve the relevance and validity of assessment?

Yes - it would help to increase the overall level of skill in the VET sector. It would increase the likelihood that those people delivering training to other trainers have a high level of skills, experience and underpinning knowledge.

- How long would this period of time be?

It should align with the entry requirements of other professional qualifications. As a guide, two years of professional experience is a typical period for entry into MBA programs.

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

- Should the TAE Certificate IV be changed to **[include]** 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?

There must be sufficient time, content and assessment allocated to the delivery of competencies relating all components of assessment – it is a core function of teaching/training.

- 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?

No. Removing any assessment-related content from the CIV TAE would lower the level of assessment-skills in the VET workforce. This would be counter-productive. Currently, there is no guarantee that trainers and assessors would continue their studies or professional development beyond their entry-level training UNLESS it is mandated as part of professional association requirements.

- 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?

For TAE qualifications, it may be appropriate to weigh judgements towards expert advice, rather than majority considerations. In a federated system, the expert advice should be sought from all jurisdictions. Experts should be individuals and organisations with advanced skills and experience in educational measurement and teaching and learning in the VET sector.

## 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?

Yes, as a source of PD it would be valuable for trainers and assessors.

- 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?

Any additional funding for PD of trainers and assessors would likely be welcomed by RTOs.

- What are the barriers to establishing a national professional association? How could these be overcome?

The source of funding may be a barrier. This could be alleviated by registration fees and also be mandated as part of on-going PD and audit requirement for RTOs.

- What would be the most useful guiding purpose of a national professional association?

To promote and facilitate assessment-related training, to increase the number of skilled assessors in the VET sector, to provide on-going professional development advice and possibly develop on-going training programs.

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

Yes to a), b), c), d)

Yes to e. However, the interaction with industry should not focus on the content validity of assessment, it should focus entirely on whether industry supports the approach to assessment and would they trust the outcomes that it will produce. In addition, is the assessment an appropriate way to measure the traits of interest?

No to option f), unless the scale of funding allows for it. This activity would require a much larger scope of operations and may use resources that may be better allocated to the association's other activities.

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

The advantages would be national harmonisation of VET outcomes and giving RTOs access to a wider range of skills and experience. This would be particularly valuable for RTOs in smaller jurisdictions or regions.

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

Not at a national level.

#### **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?

Not A. It is not a cost-effective approach. The increased regulatory and administrative burden would not produce sufficient benefit.

Although option C would produce quality outcomes, it would be resource intensive to implement. It would require legislative change.

Option B is preferable.

- What value would a VET professional association, or associations, add to the VET sector?

It could give trainers and assessors more access to PD. The evaluation of the external validation pilot project conducted by the WA Department of Training and Workforce Development revealed that trainers and assessors report that they would welcome the opportunity for further PD in the area of training and assessment.

- What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs?

Membership fees from both parties as both should be members.

- Should VET teacher and trainer membership with a professional association be mandatory or voluntary?

It depends on the functions of the association and the funding structure BUT to be inclusive it would need to be mandated as part of being in the training industry. Or membership would be required for RTOs accessing public funding.

## **6. Discussion questions – capability frameworks:**

- What can be learnt or applied from the capability frameworks that have been developed or are currently being developed?

Trainers and assessors are generally unaware of them. The frameworks do not provide concrete guidance which can help improve day-to-day practice.

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

They would be more useful if they were more specific and contextualised with examples, so that trainers and assessors could be better guided by them.

## **Chapter 2 - Reforms to the assessment of students**

### **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?

It would be useful to capitalise on the approaches and networks that RTOs currently use. Currently, these are not used to their full potential. RTOs' current approaches to industry engagement with assessment tend to be input-focused: for example, industry representatives are asked to comment on the suitability of draft assessment tools. This does not give industry sufficient scope for comment and limits their control over the

training system, which reduces their engagement with the process. It would be more effective (and also more accessible for industry) to seek their input on assessment outputs. For example, on the quality of completed student work and what this reveals about the usefulness of the assessment tool or task.

In addition, the sector's current focus on industry engagement appears to assume that RTO lecturers are disconnected from 'industry'. It does not acknowledge that RTO trainers and assessors may still be practicing tradespeople in addition to their RTO duties. They are also often well connected within their industry. The content validity of their assessments is usually not an issue. This is supported by the findings of Western Australia's implementation of the external validation of assessment pilot project. External advice and input from industry should confirm the content validity, but should also focus on the construct validity: is the tool an appropriate way to measure the trait of interest? As described above, this would take the form of industry commenting on examples of student work: has the candidate demonstrated competency in the skills or not? Has the assessment tool or task effectively elicited the required evidence? Can it be altered so that it works better?

- 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?

Potential benefits are a high-quality, nationally standardised assessment system which provides reliable assessment outcomes trusted by industry. However, such an assessment would become a high-stakes test, with all the drawbacks these typically have: a high cost of maintaining test security; a high cost of ongoing research and development to maintain a bank multiple test versions; greater incentive to cheat; and washback effects in which RTOs 'teach to the test', leading to narrower range of content being delivered.

- 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?

This would depend on the industry's preferences and the source of funding. Such tests are expensive but trades for example would be ideally suited to independent assessment.

- Should such a test be a pass/fail dichotomy, or would it be more important to use the test to identify gap training?

The test should do both. If students fail, they are given gap training and re-sit the test.

- 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?

No. It is simply a back-up measure of competency. Industry defines the elements of competency which they value most highly and the assessment is used to confirm that an individual has these competencies.

- Should the results of tests be made public at the RTO level?

Yes. This would align with current approaches to transparency in the VET sector.

## **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?

As described above, the role that industry should play is in the area of content validity, face validity and construct validity. This advice can only be based on analysis of completed assessment tools and tasks.

The current Standards require RTOs to engage with industry and they do so to the best of their ability. RTOs find it difficult to engage with practicing tradespeople as they are unlikely to have the time or motivation to get involved in ongoing discussions with RTOs about assessment. The 'industry' representatives who are willing to engage with RTOs are typically industry peak bodies or training staff at large companies. There would be little value in prescribing a definition of 'industry' for the purposes of validation, as RTOs would still only be able to draw from a limited pool of participants.

- 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?

As described above, employers and industry groups have the skills required to comment on the validity of completed assessment tools/tasks, in the areas of:

- Face validity - Does the assessment tool/task look right? Do you trust the judgements that have been made about the candidate by the assessor, based on this assessment tool/task?
- Content validity – Do the skills and knowledge elicited by this assessment tool/task reflect current industry practice? Are there any missing that should be included? Have we accurately identified what competency should look like in this skill area?
- Construct validity – Is this assessment tool/task an appropriate way to elicit and measure the skills and knowledge we are looking for? Is there a better way to do it?

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

The Building and Construction industry currently has a range of organisations devoted to this goal. Any new mechanisms in the VET sector should engage with these organisations.

- 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?

As described above, RTOs are limited in who they can target in 'industry'.

As described above, industry already has the expertise required to comment on completed assessment tools/tasks in the areas of face validity, content validity and construct validity. The current input-focused approach is flawed because industry are expected to comment on assessment tools/tasks, without any evidence of what it can elicit from candidates. It is a purely hypothetical exercise and does not give industry sufficient scope for input.

## 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

This would be useful if it is supported by a mechanism for RTOs to allocate more time for trainers and assessors to undertake PD activities. Recent consultation with RTO trainers and assessors revealed that they do not currently have sufficient access to PD opportunities related to assessment.

There is also the question of validation of assessment versus independent assessment. Independent validation of assessment may only examine the construct of the assessment tools/process but may not guarantee outcomes that meet industry needs. This would at least ensure all RTOs have valid assessment tools. However, independent assessment is aimed at guaranteeing that the outcome does meet industry expectations of the training.

- mandatory requirement to lift quality in specific instances, for example, where a qualification is identified as high-risk

This would require legislative changes as the current framework does not give the regulator this degree of authority. This approach would need to be supported by specific definitions of 'good quality' and guidance on how to lift quality. In addition, there would need to be some form of investigation to ensure that RTOs had successfully met the criteria of 'good quality'. The current approach to regulatory audits may not allow for such specific intervention in RTO activities.

- funding requirement, for example, independent validation of assessment could become a requirement for RTOs seeking to access government funding.

This would be a solution to funding issues. However, if independent validation of assessment were linked to public funding, the funding body would also be required to demonstrate that its mandated approach to independent validation is a cost-effective way to improve quality. Again is this a requirement for validation of assessment process or independent assessment of students.

- 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?

The risk with this approach is that industry are likely to use the VET sector to develop and implement any such 'external assessment'. Therefore, the same quality issues are likely to exist. It may add an extra layer of regulation with limited benefit.

- 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?

This may be best determined by the regulator.

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.

If an RTO has a high level of non-compliance they should not be delivering, especially in high risk student cohorts.

As discussed above, any such reassessment is likely to be developed by the VET sector so there is no guarantee that it would be of better quality than existing assessments. This approach may add a layer of regulation with little benefit. In addition, it is unfair to students to single them out for additional assessment. This does not provide a level playing field for all candidates. If re-assessment is required, it should be mandated at the qualification level, not for individual RTOs.

- 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?

It would be unfair to single out students for additional assessments. It does not provide a level playing field for all students, as it means that some students are given an extra opportunity to succeed (or fail). If re-assessment is required, it should be applied to all students taking the qualification.

- 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?

As noted above, there is no guarantee that assessment by another VET sector organisation would be of better quality than existing RTO assessments. In addition, awarding this degree of authority to a private firm may be an issue within the current publicly-funded VET sector. The reassessing firm's judgements would override the judgements of other publicly funded training providers. This may lead to costs for that training provider (for gap training of failed students). This is unlikely to be supported by the sector.

Existing regulators do not currently have the capacity to develop and implement Australia-wide assessments across the range of qualifications in the VET sector. To give them the capacity would require significant investment of public resources.

## **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?

Yes. These resources should be developed by industry, so that they are meaningful to their audience and fit for purpose. Existing products (e.g. Training Packages) are incomprehensible to industry.

- 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?

Assessment terminology in the VET sector is partly responsible for industry perceptions of a lack of reliability in graduate outcomes. Employers perceive that high performing 'graduates' are depicted as being equivalent to marginally competent "graduates". RTOs cannot clearly signal to potential employers what degree of competence an individual has. This is a flaw in the system with the complete faith being placed in the term 'competent'. As percentage results for underpinning knowledge tests have shown, students have varying degrees of skills, knowledge and ability.

There is a lack of understanding in the VET sector and in industry about criterion-referenced assessment vs. norm-referenced assessment. In other educational sectors, criterion-referenced assessment (i.e. what the VET sector calls "competency-based assessment") uses a range of performance descriptors to describe degrees of competence. This makes it possible to describe a candidate as (for example) excellent, good, marginally competent and not yet competent. Candidates are not compared to each other (as in norm-referenced assessment), but are rated against their industry's definitions of 'good' and 'bad' performance. Industry expect the RTO (as an educational institution) to be able to provide such information about the relative quality of graduates. However, the VET sector is unwilling to do this, as previous unsuccessful attempts to do so have used a flawed, norm-referenced assessment approach in which students are compared to the rest of their cohort. It would be beneficial to raise the level of understanding in the VET sector about this aspect of assessment.

## Chapter 3: reforms to the regulatory framework

### 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?

Yes. Overall, the evidence of assessment validity should be drawn from completed assessment tools/tasks. It is not possible to make judgements about the validity of an assessment instrument without viewing the evidence that it elicits and the judgements that are made on that evidence.

Evidence provided for audit should include examples of successful outcomes (students deemed 'competent') and unsuccessful outcomes (students deemed 'not yet competent'). This would demonstrate the discriminatory power of the assessment instrument. Under the current approach, it is possible that auditors may only view evidence of successful outcomes.

- 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?

It depends what use is made of them. Simply changing the time requirement is unlikely to have any effect and will increase the administrative burden on RTOs.

- 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?

If RTOs' existing approach to validation (including independent validation) shifts to a focus on completed assessments (as described in the comments above), the regulator need only audit the RTO's evidence of this validation process and outcomes. The extra cost and workload for RTOs would be minimal as this approach aligns with the existing audit requirements.

In addition, it is expected that the proposed professional network would include moderation and validation sessions (using completed assessments) as its core PD exercise. Regulation would seek evidence that RTOs were accessing these sessions. It is assumed that RTOs have an existing budget for PD, so that involvement in such sessions would not greatly increase costs or impose excessive burden.

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

ASQA or the state regulator. As noted above, there would be issues with publicly funding a private company to exercise such authority over other publicly-funded providers.

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

Training-only RTOs would not be a solution. Assessment is a key component of training delivery: for washback (i.e. giving the trainer an idea of how students are tracking); and for preparing the students for any final assessment (e.g. the external assessments suggested in this paper). There would be no benefit in further deskilling the VET workforce in relation to assessment.

As noted elsewhere in these comments, there is a need to improve the level of assessment-related training provided to VET trainers and assessors. This should be achieved through strengthening of the CIV and Diploma in TAE, and through provision of ongoing PD, particularly through the proposed professional network. If these features of staff development are included in the regulatory framework, there is a greater chance that RTOs would invest in them.

## 12. Discussion questions – enforcement:

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

As noted above, if RTOs' existing approach to validation (including industry validation) shifts to a focus on completed assessments (as described in the comments above), the regulator need only audit the RTO's evidence of this validation process and outcomes. The extra cost and workload for RTOs would be minimal as this approach aligns with the existing audit requirements.

In addition, it is expected that the proposed professional network would include moderation and validation sessions (using completed assessments) as its core PD exercise. Regulation would seek evidence that RTOs were accessing these sessions. It is assumed that RTOs have an existing budget for PD, so that involvement in such sessions would not greatly increase costs or impose excessive burden.

- 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?

This is best answered by the regulator.

- 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?

This is best answered by the regulator.

- 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?

This is best answered by the regulator.

- 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?

This is best answered by the regulator.

### 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?

This is best answered by the regulator.

- 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?

This is best answered by the regulator.

- 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?

This is best answered by the regulator.

- 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?

This is best answered by the regulator.

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

There would be serious concerns about validity if the original RTO undertakes 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?

It would depend on the responses to other changes proposed in this paper. Within the existing system, it would be appropriate for the reassessment to be conducted by another RTO.

**REDACTED**

## Part 2

### Quality of Assessment in VET

The priority areas for investigation by COAG have been identified as:

- Strengthening the skills of VET trainers and assessors.
- Consideration of improved validation of assessment
- Potential for greater industry involvement
- Tougher regulatory interventions

### Strengthening the skills of VET trainers and assessors

One of the major weaknesses in the VET system can be identified as the lack of adequate, sufficient and relevant training for new entrants to the training sector (trainers). The Certificate IV TAE qualification is at such a low level that it makes it very easy for 'doubtful' practices by large numbers of RTO's in pursuit of clients who are seeking the TAE qualification.

The offer of discounted training, on-line courses and very short timeframes means that people who take up the offer do not always receive adequate training. A good example is a current offer on the 'SCOOPON' website that provides prospective clients with access to TAE on-line for \$500. There are others with similar offers under \$400.

With the TAE at such a low level, anybody can become a 'trainer' in as little as five days and in some cases never 'practice or be assessed' with a group of students during what is widely lauded as 'teacher training', which is not.

The entry level qualifications need to be elevated in status, through content and practical exposure to students in the field they wish to train in. Delivery of TAE should be restricted to proven, quality providers.

It is interesting to note that when 'VET trainers' were classed as lecturers/teachers there was only one major provider of training in WA – Curtin University. They catered for the training of almost all lecturing staff in WA. The advent of opening the training market to a large number of private training providers saw the elimination of teacher training in VET (Dip Teaching or Bachelor of Arts) to entice private providers into the marketplace.

The question needs to be answered as to whether the number of 'teacher trained' lecturers with Diploma or Bachelor qualifications has severely declined as a percentage of the total number of trainers. If this is the case then the pool of experience is not there to maintain the integrity of what is a 'teaching' environment.

### SOLUTIONS

Prior to registration as a new RTO, the owner of the company should be qualified to at least Diploma level with a demonstrated 'volume of learning and assessment' in a field of expertise they are training in OR employ a full-time 'company principal officer' with the required qualifications and experience.

The TAE Certificate IV must include a significant volume of learning prior to issuance of the qualification – suggested 60 days of practical training (work) experience. (similar to Diploma of Education (Secondary)). There must also be significant 'assessment' competencies completed as part of practical experience. This would be an 'under supervision' period and part of on-going and subsequent audit process.

Only allow delivery of TAE by practitioners with University or Diploma level VET qualifications and extensive training and assessment experience (minimum 2 years) to limit the number of TAE training providers. This should raise the ability to ensure quality audits rather than the impossible task of auditing large numbers of providers.

There are RTO's that deliver high quality training in the TAE qualifications and they should be recognised with 'preferred provider' status (Excellence Framework).

The TAE Cert IV to be treated as a minimum entry level qualification and part of attaining a higher level qualification (Diploma) within two years of employment.

Trainers with the minimum Certificate IV TAE should not be allowed to deliver training and/or assessment in the TAE qualifications. They should be restricted to their field of expertise and qualification.

Limit the number of employees in an RTO with TAE Certificate IV at a specified ratio – for example, one Cert IV TAE to two employees with higher level qualifications OR one to one in the case of a sole operator - RTO plus one employee. (These are used in tradesperson to apprentice ratios in industry).

The practice of RTOs providing the TAE training to their own staff should be stopped.

#### Consideration of improved validation of assessment

Final Independent Capstone Assessments prior to issuance of qualification should be introduced, at least for qualifications that are part of an employment arrangement (apprentices/trainees etc.). The Capstone Assessment to be delivered independent of the RTO that has delivered and assessed the competencies within the qualification. If this is to become an industry standard approach and part of a funding model, then there could be progressive Capstone Assessments tied to payment of funding (or part thereof, 10% held until completed assessment or re-assessment). This will identify RTO's with high failure, poor performance rates and they should lose their registration.

RTOs must continue to be 'training and assessment' providers to allow them to provide progressive assessment of competencies that lead to a qualification. If this leads to an improvement in quality outcomes for their students then RTO's could become assessors of other RTO's students (as in UK and their Final Competency Assessment (FCA) Centres for electrical apprentices).

A centralised assessment centre with dedicated assessors would be the ideal solution but may prove difficult to achieve. However, with the cost of final assessment and issuance of qualification removed from the RTOs, the funding level could be reduced across qualifications and directed to an assessment provider. As an example, in electrical trades, the Capstone Assessment comprises 40 hours within the qualification funding. Assessors could travel to remote areas/providers to perform what is in effect an audit.

*There should be a limited number of 'Assessment Providers/Centres' that do not deliver training. In the initial stages of implementation, to ensure quality control, the centres should be based in TAFE Colleges but with assessors who may not be public sector employees, they could be from the private sector. This should be based on a cost recovery, not for profit, operation.*

**AQTF AUDITS concentrate far too much on processes and documentation. The OUTCOMES based approach to audit needs to be fully employed. For example, RTO's currently provide auditors with copies of their delivery and assessment strategy, however, the audit needs to concentrate on the evidence of the outcomes and how they were achieved. The incidence of desktop audits may be due in part to the high demand for audits of large numbers of providers.**

**Random sampling of assessments may be an alternative, using auditors with experience in the relevant qualification competencies. The results of independent assessment could however drive the decision to audit ROs identified as 'non-performing'.**

**Any non-compliance identified at an audit should be dealt with immediately and no new students enrolled until the non-compliance is rectified.**

**For RTOs that repeatedly fail to meet audit, there should be a 'three strikes and out' of registration. This should be stipulated in all new registrations and highlight that assessment results are used as a measure of performance of the RTO against the 'norm'.**

**Although the example of learning to drive is often used as an analogy to support 'capstone assessment', it also demonstrates the delivery and progressive assessment using a driving 'instructor' followed by an independent assessment prior to gaining a license. The license holder is then on a 'probationary period' where a number of infringements result in disqualification. Could this model be used with TAE?**

#### Potential for greater industry involvement

**Although industry involvement is possible in a number of situations, such as apprenticeships and traineeships, it may not be possible in others where there is no employer. *For example, a person undertaking a qualification to enhance employment opportunities such as enter a training occupation (TAE) or simply for personal development.***

**Training packages are not easily understood by employers. Therefore it is suggested a list of tasks, or specific performance objectives, be developed that employers understand and can be mapped back to competencies to satisfy an audit process. This task based process was developed in 1990 to 2000 in WA using the NATAS (New Apprentice Training and Assessment Scheme) but was never fully implemented. Task based monitoring of students with employers is used in some trades as a method of profiling performance in conjunction with the employer.**

**A task orientated qualification program was developed in 2007-08 in WA but never implemented due to the difficulty of funding delivery over the full three years of apprenticeship (off the job component). If industry is to be involved then RTOs must be funded to suit 'industry understood' programs that are not simply driven by a restrictive funding model.**

**There is also a possible misconception that industry would welcome involvement in the learning and assessment process. In an industry such as Building and Construction which uses a sub-contract employment structure, the contractors are more interested in being profitable. There needs to be some incentive for employers**

to be involved in the training process. It is often forgotten that the employer is responsible for 'on the job' training which is up to 90% of the time an apprentice is in training.

### Tougher regulatory interventions

The following identifies a number of changes and interventions that can be considered by regulators and the audit process:

- evidence of assessment validity should be drawn from completed assessment tools/tasks. It is not possible to make judgements about the validity of an assessment instrument without viewing the evidence that it elicits and the judgements that are made on that evidence.
- **With regards to ANY qualification or competency assessment, auditors need to examine assessment outcomes for both competent and not-competent students to ensure the outcomes are achievable from the assessment tool and confirm they meet the requirements of the competency/qualification.**
- **The regulators need to concentrate on the volume of learning aspect of all qualifications to ensure 'tick and flick' is being eliminated.**
- **Independent assessment should be considered as a method of ensuring that qualifications completed at an RTO actually meet what industry requires of a competent graduate.**

### VET Professional Association

If a professional association is to be effective it would need to add value to the sector, be compulsory and not simply used as a registration and regulation process. It would also need to be self-funded, as in the case of trade licensing where it incurs a regular fee to maintain currency.

The association could be used to encourage professional development and advancement, something that has been lost over the last 20 years.

Retention of currency of teaching/training should be dependent on on-going professional development if faith is to be restored in the training system.

### SUMMARY NOTES

The issues to be dealt with in the VET sector can be summarised as:

- **Low level entry qualification (Cert IV TAE) should be treated more as the 'Induction White Card' of the sector and is not a teaching/training qualification.**
- **The content, volume of learning and duration of the Cert IV TAE is not comparable to such as a Certificate III trade qualification that can take up to 6,300 hours of on and off-the-job training before issuance of the qualification. Therefore, it really is an entry level qualification that barely equates to the volume of learning of a Certificate I or II.**

- The Certificate IV TAE is delivered by a multitude of RTOs that, due to the large number of VET providers being regulated (5,000 in Australia) are not exposed to in depth audits of outcomes. TAE audits should be intensified to eliminate low quality providers and concentrate on the outcomes and volume of learning undertaken during the training.
- Progression to a Diploma in TAE should be considered as mandatory within two years of commencing employment as a trainer.
- The practice of RTOs providing TAE training to their own staff should be stopped.
- The 'one day wonders' of RPL providers must also be eliminated. If RPL is used it should be performed under very tight scrutiny, ideally a dedicated assessment centre/RTO. This need not make the process too onerous, simply more streamlined and valid.
- RPL should not be allowed for obtaining any TAE qualification; however, holders of higher level teaching qualifications should not require the TAE.
- Independent assessment of qualifications, not individual competencies should be considered to retain the integrity of the sector.
- AQTF audits need to be focused on evidence of outcomes of training, both competent and not competent, rather than the processes currently being concentrated on.
- It should be noted that the Certificate IV TAE replaced the old 'Train the Trainer' courses which were designed for 'on-the-job' low level training and NOT for delivery and assessment of RTO based VET training.