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):

4. Please indicate your interest in this discussion paper: VET PRACTIONER

    (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.

- 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:

Too many RTOs deliver TAE qualifications. The integrity of the qualification has been diminished as a result.

Yes, RTOs should be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors for transparency reasons.

Some trainers do not complete their Cert IV until they have been training and assessing at an RTO for a while. This can occur if the RTO delivers non-accredited training. In this case, RPL for at least some of the units would be appropriate, as long as the RPL process is rigorous. Some trainers do not like completing assignments for the TAE because they don't see the value. This practice needs to be stopped.

A review needs to be completed of the TAE qualifications to ensure that people who attain the qualification have a higher level of understanding of compliance to the Standards for RTOs 2015 and the practical skills of actually training and assessing. From my observation, people who typically come into the training industry have a background as a subject matter expert in another industry but do not have the knowledge and broad range of skills to transfer to the role of a trainer. The Cert IV is

a start but relies on the RTO they are employed at to extend the trainer and assessor skills. This is not usually a priority for the RTO for various reasons, time and cost being two typical reasons.

Yes, TAE qualification and skill sets should only be delivered by experienced VET practioners. There is no point in an experienced person training someone how to be a trainer when they don't have much experience themselves. There definitely needs to be a discussion about whether someone delivering the TAE qualifications to have a university-level or higher-level VET qualifications. As someone who has an education degree, I find the understanding of pedagogy very limited amongst many VET practioners. This needs to be improved.

Adding an on-the-job practical component (not just scenario-based but evidence that the person is training, assessing and developing) to the TAE qualifications would make the qualifications more rigorous.

Entrants to the TAE Diplomas (both VET and Design/Development) should definitely provide evidence of being currently employed in the VET industry over a minimum period of at least two years full-time (not a casual trainer role as this could limit training and assessing opportunities).

- 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:

The development skill sets need to be valued more highly. In general, trainers have gained these units of competency by way of the Cert IV without any real understanding of the skills. The Diploma of Training Design and Development has partially addressed this gap but is usually delivered concurrently with the Diploma of VET. Therefore, people who gain the Diploma of VET will automatically gain the Diploma of Training Design and Development without focussing on it. The role of a VET developer is still considered second to the role of a trainer instead of being acknowledged as equal. Trainers often say to a developer 'you can pretty up the document' and treat developers as if they are admin assistants.

The problem the TAEASS502B Design and develop assessment tools unit of competency being only in the diploma-level is that trainers miss out on understanding the requirements of assessment tools. This is the area with the biggest issue between trainers and developers as trainers generally don't realise the implications of not having a rigorous assessment tool from both a compliance and candidate perspective.

Updates to the any qualification should not be based on majority vote. Proposed changes should be made on the educational ideology and the principles of assessment, not just personal preference.

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:

There definitely should be a professional association for the VET system. Some states have a professional association or registration body for teachers. The training industry should have the same. An association implies that it is a body which helps support an industry group. There are already training associations nationally and state-based. These could be centrally- coordinated or replaced. There's lots of professional development to keep trainers current in their subject matter field but not so much in the TAE qualification.

A registration body would require the industry professionals to be regulated, which would be better. Not only are teachers required to be registered, but at least one state requires teachers to submit evidence of prolonged evidence of professional development to apply for your licence every five years. The same should happen for trainers.

The barriers could be buy-in from people who have had lots of experience as trainers but don't see the role as a profession. An example is when it became mandatory for all trainers of accredited courses to hold the Cert IV TAE and the qualifications that they deliver. There was uproar amongst some trainers (in particular the state training provider trainers) who didn't agree with this approach. Cost would also be an issue, but this was accepted when states introduced the teacher registration bodies.

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:

Set expectations for professional development hours and types of courses, not necessarily dictate course delivered by the national professional association. It could be perceived as a money-making exercise from the association.

Promoting the profession of VET trainers would be expected of a professional association. There is a long way to go with people understanding that the training industry is not just about standing up in front of a class.

Definitely register VET practioners and make them keep their VET training and assessment knowledge and skills current, just like any other VET qualification requirement.

As the TAE are national qualifications, the activities should be coordinated at a national level and available in every state. Existing groups cater for each state and if it's a national group, it tends to be focussed on the eastern states only.

Australian Institute of Training and Development is a national group which could be expanded. There needs to be more rigorous professional development offered.

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:

All models have parts which would be useful. Model A has more structure than the other models. The government input is critical as RTOs comply with government rulings. However, this model may fall down if it is cascaded too far down the line. You want to avoid the message getting lost in the system or misinterpreted at each stage. Model C's idea for a VET registration is excellent. It could either be added to the state teacher registrations or its own body. If added to the teacher registration bodies, there would need to be staff employed who have a VET background.

A VET professional association would increase the professionalism of the VET industry as it is adhoc at the moment. Some RTOs do a great job to upskill their VET practioners but this is not standard.

Membership fees would be critical as with other industry associations.

If it is an association purely for upskilling the VET practioner, then the membership would have to be voluntary. If it is was interwined with the VET registration body, then it should be mandatory that you cannot work as a VET practioner without this.

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:

The capability frameworks are useful but not well-known in the VET industry. If they are to become a key component, then it would be useful to review them and conduct professional development on them to all practitioners.

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:

Validation is the key to increasing knowledge of how to conduct assessments. If you don't make it mandatory, then it won't be a priority.

Externally administered tests are not the best option. It would be better to developer the trainer/assessor understanding of how to develop and administer effective assessment tools and techniques. External tests will highlight the problem that we already know exists. A better option might be to review the assessor skill set units in the TAE qualifications and make it a requirement that current qualified TAE practioners are to update their knowledge and skills in this area by attaining new units to hold currency in the qualification.

If external tests are the solution, there is a lot of planning to be done. It would be a good idea to look at state education assessment authorities to find out how they have approached this.

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

- What role should industry, for example, employers and industry organisations, play in validation of assessment? Does the varied interpretation of 'industry' inhibit a proper appreciation of the topic and should it be defined? If so, who would best define 'industry' when considering the practice of validating assessment?

- Do employers or industry groups have the skills required to fulfil this role in validating assessment? Is assessment such a specialised skill that industry and employers either do not want to get involved or should not get involved?

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

- How can we ensure engagement with industry is appropriately targeted so it does not add undue burden and is targeted to those within industry with appropriate expertise required for validation of assessment?

COMMENT:

It is already a requirement under the Standards for RTOs 2015 that industry is to be engaged when developing and validating assessments. It would be good to define 'industry' so that all RTOs know what this means.

The validation requirement explains that the process can be conducted by a group of people, including those with industry backgrounds, Cert IV TAE qualifications. As long as the group is made up people with all of these characteristics, then it's valid. The employers or industry groups have the currency of subject matter expertise. The Cert IV TAE person has the currency of assessment expertise.

Although it would be useful to build industry knowledge of training and assessment, it could backfire with individuals then thinking that they are a trainer/assessor expert. In discussions during validation, it is imperative to give some background, but emphasise that they are being consulted as an industry expert, not assessor.

I would hope that industry bodies are motivated to be consulted for validation. If not, an education program could target this gap.

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:

All RTOs should conduct validation to the same standard. Otherwise, some qualifications will not be as rigorous during the validation. It's not fair to the candidates. High-risk qualifications are constantly targeted but all should be. If some qualifications are to be targeted, then maybe government funding would be required as it is an extra burden for the RTO and its industry experts.

If industry has been consulted in the development of assessments, then they have already validated the assessment tools. A co-assessor situation would be useful, with an industry expert and qualified assessor.

Working in a risk-based RTO already puts you under the spotlight of various organisations. If you are working for ones of these RTOs, you should already have rigorous procedures in place. If not, how are you passing an audit?

Perhaps more regular auditing of assessments should take place rather than waiting until the RTO licnence audit every five years. This would then be considered an independent validation. I don't see the need of a validation for a whole student cohort. A sample should suffice, if selected by the independent validator, not the RTO. This approach is taken on an annual basis to senior school curriculum and assessment audits. The same level of rigorousness should apply to the VET sector.

The existing regulators should take the role of overseeing reassessments. Once you privatise this approach, there is a risk of compromise and unethical behaviour.

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:

VET graduate expectations should be included in the qualification/unit information rather than a separate document.

There seems to be limited knowledge of the common understanding of VET system outcomes. Many RTOs, trainers and assessors possibly don't take this into account. The focus is on what to and how to assess the candidate whilst they are enrolled in a qualification.

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:

There is a confusion about the word 'validation'. The definition of 'validation' at the beginning of the Standards for RTOs is clear but then when you get to 1.8, 1.9, 1.10 and 1.11, it is not so connected to the definition. VET practioners refer to 'moderation' as separate from 'validation', but my understanding is that 'moderation' is no longer a term to be used and the word 'validation' incorporates both validation of the assessment tools and the assessment practice.

The 'Rules of Evidence' need further definition. Guidance of how to evidence that courses assessed comply with the Principles of Assessment and the Rules of Evidence would be helpful.

It would appear (from the formation of this discussion paper, at least) that assessment is an issue across audits conducted on RTOs. Therefore, more prescriptive conditions of registration would be helpful. I don't think that most RTOs deliberately set out to fail the assessment part of an audit; it's more lack of understanding and knowledge. Professional development by ASQA (or the state regulator in the case of Western Australia and Victoria) would be useful. Being told by an auditor that you have failed a part of an audit but not told how to fix it is a common approach. RTOs then have to employ an independent consultant who often has a different opinion from the auditor.

A more supportive role of the regulator would be better than an enforcement approach. A lot of the time, the RTO wants to fix the problem but doesn't know where to start. Templates and sample assessments would be very useful. There is a template for the Recognition of Prior Learning. Other assessment templates would be appreciated.

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:

Rightfully, there does need to be adherence to the standards. RTOs generally want to do the right thing. A threat of enforcement is not helpful. In the extreme cases, where an RTO has deliberately ignored any part of the Standards, fair enough. They are probably the repeat offenders. n most cases, it's ignorance. Support documents like 'Assessment in the VET Sector' are really useful.

Hopefully the new Service Skills Organisations and Industry Reference Committees can support RTOs further. In the past, it depended on who your Industry Skills Council was. There needs to be standardisation of the SSOs and IRCs so that all RTOs have equal support and accurate information.

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:

Cancelling qualifications should be applied consistently across all RTOs, not just high-risk ones.

If it's a case of student fraud, the person should not have a right of reassessment.

There does need to be a timeframe after which an individual's qualification cannot be cancelled. The legal implications are problematic. What happens if a qualification is cancelled and the person's employer not only dismisses the person, but tries to seek money because the company has now been put at risk? Cancelling a qualification has to be done within a short period of time of issue (possibly 6 months). What happens if the problem is picked up at the five yearly audit? It's not fair on the student if he/she gained the qualification fours years previously.

Another reputable RTO should reassess the candidate as the RTO if the RTO passed their audit in the previous one year.