



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: Individual Organisation
2. Full name:
3. Organisation (if applicable):
4. Please indicate your interest in this discussion paper:
(i.e. as a student, VET practitioner, RTO, third-party provider, peak body, business, industry representative, regulator or other government agency or community member)
5. Do you want your submission to be published on the department's website or otherwise be made publicly available? Yes No
 - a. If yes, do you want your name and organisation (if applicable) to be published alongside your submission, OR would you like for only your submission to be available and your details kept anonymous? Published Anonymous
 - b. If no, please advise the department upon submission that you do not want your submission to be published or otherwise be made publicly available.

1. Discussion questions – RTO limitations:

- Is it appropriate for relatively large numbers of RTOs to deliver TAE qualifications or skill sets? Should the number be reduced to a targeted number of RTOs focusing on high-quality provision?
- Should RTOs be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors?
- Are TAE qualifications and skill sets so significant that evidence of competence should not—or cannot—be appropriately demonstrated via recognition of prior learning?
 - Is recognition of prior learning for TAE qualifications or skill sets granted with sufficient rigour to ensure the quality of student assessment? Should the practice be restricted?
- Are there opportunities to improve the assessment skills of the VET workforce through changes to the delivery and assessment of TAE qualifications and skill sets?
 - Should TAE qualifications and skill sets only be delivered by VET practitioners who can demonstrate a specific period of training and/or assessing employment history in the VET sector?
 - What circumstances would support a change requiring some VET trainers and assessors to hold university-level or higher-level VET qualifications, for example, practitioners delivering and assessing TAE qualifications and skill sets?
 - Should the TAE Certificate IV and/or Diploma require a practical component? If so, how long should the practical component be?
 - Should entrants to the TAE Diploma be required to demonstrate employment history in the VET industry before being issued with the qualification? Would this condition help to improve the relevance and validity of assessment? How long would this period of time be?

COMMENT:

Point 1: It is often appropriate for many RTOs to deliver the TAE qualifications and/or skill sets as Australia is a very large country with populations scattered throughout. If the delivery and assessment is restricted in any way, then regional areas need to be catered to. As has been pointed out, total online delivery of this course is not appropriate and it would be unreasonable to expect future trainers/assessors from regional areas to bear all the costs of travel and accommodation. A partial solution is video-conferencing which would be appropriate for the higher level qualification, i.e. Diploma.

Point 2: My answer is a qualified yes. Those in regional areas might find it economically challenging to access another RTO. Also, perhaps moderation between RTOs could be a solution.

Point 3: Clause 1.12 of the national standards for RTOs 2015 negates this suggestion. RPL must be available for anyone who requests it. Perhaps there should be, as suggested above, a moderation session between several RTOs to validate the evidence presented. This should provide enough rigour for the process.

Point 4: Clauses 1.21 to 1.25 of the national standards for RTOs 2015 state clearly that from 1st January 2017, all trainers/assessors delivering the Certificate IV in Training and Assessment or the assessment skill set must hold either the Diploma of Vocational Education and Training or the Diploma of Training Design and Development or a qualification in adult education higher than a diploma. RTOs delivering qualifications and/or skill sets from the TAE training package must also have independent validation of their assessment tools, processes and outcomes.

Both the Certificate IV and Diploma require a practical assessment component. For new entrants completing the Certificate IV you could institute a vocational placement as is required with some other qualifications/units of competency. The Diploma requires participants to complete training and assessment of a minimum number of candidates and a minimum number of units of competency.

The Diploma should have the Certificate IV as a pre-requisite for starters. They must also currently hold a training role and provide a supervisor's/manager's report to state that they have conducted a minimum of 200 hours of training of various units of competency or accredited courses and assessment of at least 30 participants in total. All participants must have access to a VET workplace environment in order to undertake practical program elements and assessment tasks.

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

- Should the TAE Certificate IV be changed to a core unit on the design and development of assessment tools? How would this improve assessment outcomes for students?
 - Should the core unit be the existing *TAEASS502B Design and develop assessment tools* unit of competency? Are there alternative approaches, such as developing a new unit on the design and development of assessment tools?
 - Is the *TAEASS502B Design and develop assessment tools* unit of competency a specialist unit that should only sit at the diploma-level on the basis the Certificate IV is currently designed for delivery to new entrants seeking to be trainers and assessors?
- In the case of making any updates to the TAE, is it appropriate to form judgements based on majority considerations? Or is it too risky to do so? Is it a better basis for decision makers to give strong weight to key stakeholders and the nature of the argument put forward?

COMMENT:

It would be presumptuous to make comments about the suggestions in this section until the release of the new TAE training package. Much work has been done by IBSA and other stakeholders. In the final submission in January this year, they had added new performance criteria and volume and frequency of assessment requirements for the three assessment units as well as the assessor skill set. Let's just wait and see what happens, considering that PWC is now the skill service organisation charged with developing the TAE training package.

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 is a national association which caters to all RTO staff including trainers/assessors which covers both public and private RTOs as well as consultants. It's details are below.

VELG Training is committed to providing the Vocational Education and Training (VET) sector community with quality, flexible and innovative services and products. Membership is available to all VET practitioners from private, public and enterprise training organisations as well as VET consultants. Velg Training Members are provided with a login to the custom built Members Lounge, an online portal on the Velg Training website, where they can access hundreds of VET resources and news updates, discounts on professional development opportunities, consulting services and products and networking opportunities.

Having said all that, it is also worth noting that many trainers/assessors are required to be members of associations attached to their specialty training field (e.g. be a member of SIA for work, health and safety). Membership costs can be prohibitive if trainers/assessors have to become members of more than one association.

Clause 1.16 of the national standards for RTOs 2015 states 'that all trainers and assessors undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency based training and assessment.'

Perhaps we should also adopt the assessors' code of conduct.

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:

Point 1: If a national professional association were adopted, I agree with all of the activities proposed except for 'interact with industry to respond to their emerging needs'. Is this not the remit for the newly formed skills service organisation whose mission is to:

- Research what skills are needed in our industries and businesses, both now and in the future, to provide the right skills to match our job needs; helping us to stay at the forefront of global competitiveness and support continued economic prosperity.
- Identify and understand current and emerging trends in the global and domestic economy and how they impact on Australia's skills needs.
- Revise our qualifications and training programs to better match what people learn with the skills needs of our industries and businesses; giving our population the best possible chance of developing work ready skills.

Points 2 and 3: As previously mentioned, VELG Training fulfils this role.

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:

Model A would be the most cost effective and allow for variations across regions and differences in requirements for trainers/assessors. My only concern is if an RTO has a membership that trainers/assessors attached to that RTO (either through direct employment or as a contractor) will not necessarily have access to or receive updates from the professional association. It would need to be mandated that all trainers/assessors attached to an RTO must have their email address supplied to the association so that they at least receive the communications.

The value of a VET professional association would be to keep members up to date with any changes in the training and assessment field (both nationally and internationally) and to share success stories and any problems.

Membership fees would need to be kept to a minimum so that they do not impinge upon the financial status of members. You could have an individual membership fee and then a sliding scale fee for RTOs based upon the number of trainer/assessors they have.

Perhaps instead of making it mandatory, it should be preferred. This way, when trainers/assessors apply for positions or wish to attach themselves to an RTO, having membership would be seen as a bonus and this would drive change from trainers/assessors rather than having it imposed upon them.

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 framework is awesome! It should be adopted by any proposed professional association and all RTOs. It has a multitude of uses for trainers/assessors and RTOs.

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:

Point 1: Vocational placement has not been mentioned anywhere. Just as student teachers are required to spend time in a school under supervision, so too can trainers/assessors. This means that more experienced trainers/assessors act as coaches or mentors (they would need to develop these skills) and the trainees learn practical skills on the job. These placements would be unpaid.

Point2: Externally administered assessments are very costly and who pays? I also refer to the recently released strategic review report on the security industry by ASQA, specifically page 97. The NSW Licensing Authority already administers an external assessment as well as controlling the training material. The points set out by an RTO on the aforementioned page bear looking into before deciding to take up externally administered tests. They cannot be a one size fits all. That is the beauty of competency-based training and assessment. As long as the participant has reached the standard, they are competent.

On-the-job assessments by an accredited assessor can be useful, but consideration must be given to the industry type, e.g. to assess a security trainee on the job when their chosen field is crowd control is not always practicable when the requirements for employment are that the trainee works outside of usual trading hours for many businesses.

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:

Point 1: The newly appointed Skill Service Organisations have as part of their remit to engage with industry as well as to develop training packages for those industries. Perhaps they, with their contacts, would be a starting point for involvement of industry.

Point 2: Employers/industry groups do not always have the required skills for validating assessment. Some are too busy with their own businesses. This should not deter us. It is up to us to take their thoughts, ideas and information about their business/industry and mould it into our assessments. We can then meet with them to discuss how we have taken on board their suggestions and how this will improve the relationship between all parties.

Points 3 and 4: This is where using the capability framework could come in handy for both RTOs and business/industry groups.

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:

Point 1: Agree with all suggestions

Point 2: Please see previous comments in Section 7.

Point 3: Agree with public safety and RTO profile. The student cohort risk factor would have to be fleshed out further so as to avoid claims of discrimination.

Point 4: Please see comments from Section 7.

Points 5 and 6: This could get muddy and burdensome. However, random sampling should be the requirement if it goes ahead and administered either by ASQA for auditing purposes or the relevant Skill Service Organisation.

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:

Point 1: As Skill Service Organisations are already conducting research into their particular industries, they would be the obvious choice.

Point 2: This could also be part of the development of training packages.

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:

As the new standards only came into effect in April of last year for existing RTOs, I think it would be useful to adopt a 'wait and see' stance. It would be interesting to gather information from ASQA first about changes they have noticed since the adoption of the new standards and if, in their opinion, there needs to be a revision of the standards.

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:

It would appear that the restrictions section on Training.gov is not utilised as much as it could be. I just checked on Cornerstone Investment Aust Pty Ltd (RTO No 5500) on Training.gov and it is listed as current. In the restrictions section it only lists a decision dating from August 2013 regarding monitoring attendance under Standard 11 of the ESOS Act. On 5th February 2016, ASQA announced the cancellation of the RTO. This is not an isolated instance. The Australian Institute of Professional Education Pty Ltd is also listed as current and yet ASQA has cancelled their registration. Training.gov.au is publically available and yet does not have the corresponding information that is communicated by ASQA. This needs to be remedied.

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:

Point 1: This is difficult. Participants have completed assessments in good faith. Perhaps mandatory external validation of assessments for high-risk industries.

Point 2: Obviously re-assessment should not be offered to those who have committed fraud. In my time as a compliance manager, this has been a very rare occurrence where I detected fraudulent activity after the awarding of a qualification. Fraudulent activity, when it occurred, was detected prior to deeming a participant competent.

The time period for re-assessment is important. Many participants forget information after assessment unless they utilise this information regularly. In some industries, students who have successfully completed a course then have to apply for a licence which can take up to 2 – 3 months to come through. In the meantime, they are unable to work in that industry.

The cost of re-assessment should be borne by the original RTO where fraudulent activity by a participant is not a factor.

The re-assessment should be conducted by an outside organisation. The only time where it would be appropriate for the original RTO to conduct the re-assessment would be where the original assessor was at fault and not the assessment tools.

There should be an experienced assessor and an industry expert.

Point 3: A fairer TAS scheme should be established. At this point in time there are only 2 schemes available unless an RTO wishes to develop their own. If wishing to join the ACPET scheme, you must first be a member (a double whammy in fees!)