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 Practitioner

    (i.e. as a student, VET practitioner, RTO, third-party provider, peak body, business, industry representative, regulator or other government agency or community member)

5. Do you want your submission to be published on the department's website or otherwise be made publicly available?   [X] Yes   [ ] No

    a. If yes, do you want your name and organisation (if applicable) to be published alongside your submission, OR would you like for only your submission to be available and your details kept anonymous?   [ ] Published   [X] Anonymous

    b. If no, please advise the department upon submission that you do not want your submission to be published or otherwise be made publicly available.

1. Discussion questions – RTO limitations:

- Is it appropriate for relatively large numbers of RTOs to deliver TAE qualifications or skill sets? Should the number be reduced to a targeted number of RTOs focusing on high-quality provision?

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

- Are TAE qualifications and skill sets so significant that evidence of competence should not—or cannot—be appropriately demonstrated via recognition of prior learning?

    - Is recognition of prior learning for TAE qualifications or skill sets granted with sufficient rigour to ensure the quality of student assessment? Should the practice be restricted?

- Are there opportunities to improve the assessment skills of the VET workforce through changes to the delivery and assessment of TAE qualifications and skill sets?

    - Should TAE qualifications and skill sets only be delivered by VET practitioners who can demonstrate a specific period of training and/or assessing employment history in the VET sector?

    - What circumstances would support a change requiring some VET trainers and assessors to hold university-level or higher-level VET qualifications, for example, practitioners delivering and assessing TAE qualifications and skill sets?

    - Should the TAE Certificate IV and/or Diploma require a practical component? If so, how long should the practical component be?

    - Should entrants to the TAE Diploma be required to demonstrate employment history in the VET industry before being issued with the qualification? Would this condition help to improve the relevance and validity of assessment? How long would this period of time be?

COMMENT:

I think only a limited number of RTOs should be allowed to deliver TAE qualifications and the qualifications required to conduct/deliver the training should be higher than the current requirements. Surely a tertiary (university) qualification in Education/Adult Education/Training would be a minimum to teach people to be trainers. Make the role of a VET Professional a recognised and regulated profession like a Teacher and provide for formal on-the-job development/mentoring processes to ensure skills are actually developed and not just instilled through RPL processes.

RPL processes in the area of TAE are over-used, just as in other VET qualifications, but there is something wrong when people can obtain a Certificate IV in a couple of weekends with a hefty slice of RPL. The use of RPL for TAE qualifications should be very limited.

RTOs conducting TAE qualifications must include external Training Professionals with tertiary qualifications in their Validation process.

Also there should be continuous professional development and not just through upgrading to the next incarnation of the TAE.

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:
There needs to be more focus on "unpacking" Competency Standards and then the development of the assessment tools.

I reserve my judgement on the ability of the SSO to make updates on the TAE Packages but clearly the previous ISC was unable to keep the interests of the wider VET Sector close to mind. The VET Sector is a major employer of people with TAE qualifications.

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 are associations such as AITD (or AHRI). Perhaps funding could improve the operation and organisation of an existing organisation rather than create a new one.

There is also the stirrings of a global VET Association and so we should look at how Australia's VET Professionals would be seen globally.

A barrier to establishing any professional association will be how the current VET professionals are brought into the association. Any automatic acceptance into an association without the ability to differentiate between the skills levels and abilities of the practitioners will simply move the problem inside an association. If we "grandfather" people into the organisation it will take too long to make the steps changes required in the profession

Any centralised VET professional association will struggle to support regional VET Professionals

Establish professional standards, communicate best practice and provide continuing professional development.

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:

VET Training Professionals should be registered and regulated just as with Teachers in the Educations Systems. That way professional standards could be enforced.

Establish professional standards, communicate best practice and provide continuing professional development.

Grading of membership may ensure only suitably skilled and experienced VET professionals undertake key roles in RTOs. It would also help ensure RTOs cannot quickly appear and quickly fold inexperienced personnel at the helm.

There are associations such as AITD (or AHRI), and structures are in place, however it is different to move a professional association from one where members voluntarily join to one of compulsory membership.

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:

Regardless of which model the desired outcomes must be the ongoing development of the skills of VET Professionals and not be a money generating process at State or Federal level. Model B over Model A and not Model C

Mandatory membership (registration) is required and that way issues (such as working with children etc) can also be monitored.

Establish professional standards, communicate best practice and provide continuing professional development.

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:
It shows how an ISC can be hamstrung and unable to implement processes to improve itself.

If there is no agency/body driving additional professional development there is little opportunity to influence the skills of current and future VET Professionals

- 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:

Enterprise RTOs training and assessing their own employees are treated the same as RTOs training and assessing others (students) but there is a big difference in the industry engagement an Enterprise RTO has compared to an RTO offering a range of qualifications on a commercial basis. Their reason for operating as an RTO is different, as is the impact on the wider community because Enterprise RTOs rarely train people in significant numbers.

If the intent is to create and publish "league tables" like school NAPLAN tests it will create more reason to make a judgement of "competent" for students.

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:

All of the focus on training and assessment is within the VET Sector. Most people fail to recognise that industry uses competency standards to inform their own training and assessment processes even if they are not an RTO. Individual organisations may use the Training Packages and the individual competency standards so they know what industry expects within vocational roles.

Unfortunately the VET Sector stakeholders only see industry an employer of graduates of the VET and not an active user of Training Packages. The data supplied to Government Agencies on the use of VET Training Packages only comes from RTOs and is based purely on enrolments and not who uses the Training Packages. As a result qualifications disappear due to "no demand" but it really means no new student enrolments.

The VET Sector has been allowed to continue the ongoing development of Training Packages without substantial industry involvement (except through

TAE qualifications are aimed purely at the VET Sector. In theory it should be very difficult for someone outside the VET Sector to obtain a TAE Certificate IV or Diploma as they would not have RTO processes such as validation processes to participate in or even lead a validation.

- 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:

Higher requirements enforced on RTOs without the staff with the required skills will achieve little – especially if there is little review of the activities. How frequently will validation practices be audited? How long will it take until poor validation processes are detected?

Treat enterprise RTOs differently as they are already industry aligned. The constant expectation to make enterprise RTOs operate the same as other RTOs places a large impost on enterprise RTOs who generally rely on operating in areas not well covered by the VET Sector because the activities of the business is too specialised.

The risk are varied – depends upon the stakeholder

QLD Mines expect qualifications to be re-assessed every three years- part of legislation – why is that not questioned by the VET Sector

- 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:

Job ready VET graduates is a myth because other workplace legislation makes that impossible. There is always the workplace training/experience required to support the application of those skills in the workplace. For example there is training on the equipment used on site, or the computer technology and associated software programs, or the policies and procedures used on site.

Job readiness is limited to conceptual knowledge and the application of fundamental skills only. For example:-
- a Business Service graduate should be able identify creditors and debtors and therefore be trained in how an organisation processes their accounts receivable and payable.
- a graduate from a trade or technical VET qualification should be able to read and interpret a standard engineering drawing or process diagram

Transferable skills in most cases are not due to the VET qualification, but from one workplace to another. For example a competent control room operator for a process plant could not sit in front of the control panel of any other plant and automatically be competent unless the process plant was exactly the same (same process and same control panel system).

The application of Training Packages and Competency Standards exists beyond the VET Sector. Industry uses competency standards as a way of ensuring their internal training at least meets industry standards but that does not mean formal VET Qualifications. In the early days of Competency Standards this was covered in the scope of use for the Training Packages but reference to this use by industry has ceased.

The term "competent" is used in WHS legislation but does not have the same meaning as being competent in the VET Sector. The terminology should be consistent and if the term "competent" is used in reference to training (such as in the WHS) it should have the same meaning.

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:

Yes the RTO Standards around evidence should be strengthened but more information/guidance is required in the actual competencies. It often appears that RTOs are looking for the absolute minimum amount of evidence they need for assessment.

RTOs that promote/advertise qualifications through full RPL processes should be seriously scrutinised.

RTOs should not be able to charge the same amount for a course awarded through RPL. This provides a financial incentive to maximise the profit by eliminating the delivery and minimising the assessment.

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:

Establish specialist auditors who can focus on the assessment processes only and not try to fit that component in as part of an overall audit/review.

Review assessment processes as part of the RTO approval process. Therefore the RTO would need to have effective assessment processes otherwise they cannot approved for registration. Subsequent validation processes can then concentrate on continuous improvement

Treat enterprise RTOs differently as they are already industry aligned. The constant expectation to make enterprise RTOs operate the same as other RTOs places a large impost on enterprise RTOs.

- 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:

How would the cancelling of a qualification occur? Will ASQA send a letter or people knock on your door and ask for the certificate back?

What employer is going to check whether a qualification presented is cancelled if already they have limited ability to check whether a qualification presented is genuine!

Would ASQA notify licencing bodies that a required qualification has been cancelled?

If cancelling is an outcome the person should be able to be re-assessed by another RTO and at no additional expense. To support that process a levy could be applied to support a re-assessment program to ensure students impacted by the cancelling/recall of an awarded qualification