



## 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](mailto: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  Yes  No website or otherwise be made publicly available?
  - 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:

A. only high quality RTOs should provide this training.

B. Yes, as this can lead to a lowering of the standards via passing a mate. It's much better to have an outside qualification. This ensures a high standard is maintained.

C. No. The concept of competence should transfer as long as the evidence supports qualification.

It could be a school / TAFE / university teacher of many years of experience moving into a new position and need the TAE for the Job.

D. i, Firstly everyone has to start somewhere. If a newly certified person, who has some experience in delivering courses at a lower level, now has a higher qualification that would allow them to deliver a TAE course, then they should be able to do so. Possibly under the eye of a mentor for a period of time, or a number of courses. Experience and a higher level of qualification should be a requirement.

ii, None, if this is introduced, then the pool of available people to do the training and assessing will be greatly reduced. Especially in the volunteer organisations, more so in the employer areas, as they rely on the more experienced workers and supervisors to take on the role of trainers and assessors.

This will also push up the cost of training should an employer need to use outside sources to conduct the training and assessing for them.

iii, Yes, trainees need to be able to demonstrate they can do the training and assessing over a number of courses. Also need to demonstrate the ability to develop session plans and assessment tools.

iv, Yes, this will develop a deeper understanding of their role as a trainer / assessor. A 2 year time frame at this level should be required. If the person has had experience prior to gaining the TAE Diploma then that should be taken into account.

## 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:

A. Yes, the title is Training and Assessment. If you can't develop an assessment tools, then how can you adapt to training and or assessing new work practices.

i, Yes, this is the entry level for training and assessing, no need to change the unit at this stage.

ii, No, this would make it difficult to work with. As a trainer, the assessment tools need to match the methods used in the training program. Otherwise, we end up with an assessment tool that differs from the training actually conducted.

B. This question could be answered both ways. Yes, if the organisations that runs their own training and has a good industry record. Or no if the organisations have a doubtful record.

Key stakeholders should have an input, but not to the detriment of smaller organisations.

### 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:**

A. No, I believe it would be better to join or affiliate with an existing association.

Governments have a role to play in the development of the VET workforce, but be should limited or guided by the VET industry experts in regards to how to achieve better professional standards and outcomes.

Having the government fund something such as an association may lead to a higher government control, overriding industry experts and industry concerns.

B. Costs, why reinvent the wheel. We have existing associations that could assist in this such as the state teachers associations. They are all about training and already have the structure set up.

C. Set a professional standard in delivery of training and assessment, and cancel RTOs and individuals qualifications due to noncompliance if the need arises.

#### 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:**

A. These activities outlined in point 1 are all that you would expect an association to conduct on behalf of all parties involved.

B. None, I think the best option is to utilise existing groups in an affiliate or membership of an existing association.

C. This would need some investigation, not qualified to answer this.

## 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:

A. Model C would be the most appropriate, as there is an existing association with lots of expertise.

The wealth of knowledge and expertise in the existing association would be a great asset as most of the members are involved in training and work within the VET workforce anyway in some form.

Such as the teachers at TAFE NSW. We would of course need to attach VET representatives to their association to deal with VET specific issues.

B. Not qualified to answer this one. But I think it would provide a larger pool of expertise and assist in bringing about change for the majority and not for the bigger players.

C. Both.

D. Voluntary, if something becomes mandatory that has nothing to do with the actual work, then you lose good people.

## 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:**

Not qualified to answer this.

I think we are on the right track is all I can contribute.

## 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:

A. Yes, we should have the government cut the funding to those organisations that have been found to be very doubtful in their ability to train, where the student outcomes are nowhere near the standards required, yet they have been deemed competent.

B. This should be by a challenge test / assessment for practical work, and maybe short answer questionnaire for basic required knowledge for the job. These tests / challenges should be used to identify any gaps in the training, and have ongoing training and assessment to meet the industry and organisations standards. Depending on the situation, reassessment can be local or outside based.

Challenge tests should be carried out on those workers that have shown not to have the desired skills sets they should have if the training was carried out correctly. This can only be identified by supervisors on the job, and should not be taken out on the employee. The training organisation or employers trainers need to be held accountable for any gaps of the trainee's abilities.

All reassessments should still be competency based, and only those involved be informed of the results. Employers, supervisors, assessors.

## 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:

A. Industry knows what it wants, so I would think industry would be the ones to have some input as to what the requirements are expected of specific assessments .

B. In some cases I would say yes. Smaller employers may not have the workforce to delegate trainers but should have support from industry groups to ensure their employees are trained correctly.

Industry groups should have the resources to meet the industry standards, as they are the people where the information came from to set the standards in the first place.

C. Not qualified for this one.

D. As above.

## 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:

A. Independent validation should be mandatory for specific qualifications where high risk tasks are performed as part of the daily tasks being carried out by individuals in a workplace.

B. I believe so. Where the public may be at risk and fellow workers, assessments should be from an external source to ensure safety standards.

C. All of these are important, public safety is paramount, and the safety record of RTOs should be taken into account through accident records. The basic conduct of students needs to be considered also, with regards to observing the safety protocols of the organisation.

D. Any student who displays a carefree attitude that may lead to an injury or worse, should be reassessed by an independent organisation. This would remove the chance of having someone let through who shouldn't be.

E. This usually can only be determined through workplace observation of the actions of a student , or actions noted during practical sessions. So only those individuals that are demonstrating unsafe behaviour should be reassessed. This will reduce the costs to the employer / organisation.

F. Existing regulators should appoint an external assessment specialist to conduct the reassessments as required. This will ensure the high standard is maintained. However, if the organisation has a very high standard in its own systems, another assessor may be appointed to conduct the reassessment of individuals as required.

## 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:**

I think the current system works if all the existing guidelines are followed. The specific units of competency and the elements, and performance criteria are clearly set out, the expectations of what is required especially where the range statements require organisational protocols be followed are sufficient at this time.

## 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:

A. I think the standards are already set to a level that provides quality outcomes, so long as the full performance criteria requirements are met. However I do think that actions against noncompliance needs to be quicker where an RTO has been identified as falling short of their duty of care. This includes the training delivery as well as the assessment process.

B. We need to keep in mind, who is being trained, what they are being trained to do, who is delivering the training (the actual trainer & the employer small or large), who is conducting the assessment. If we push basic training levels too high, and require higher level qualifications for certificate IV, the costs would be higher for industry and smaller employers would be at risk of not being able to meet the compliance requirements.

C. ASQA should be the main body to oversee the performance of RTOs and their trainers and assessors. How they do this, should be worked out by the higher level groups involved in the training framework.

D. In some ways this could lift the standard, but will only add to the costs of training and assessments. So I feel that if your organisation trains, it should be able to assess.

## 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:**

I'll leave this to the experts.

### 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:

A. Yes. The main factor should be safety, and if an individual or group of workers are not following the organisations safety protocols or working within the required performance criteria, then retraining / reassessments should be mandatory.

B. Yes.

- I. Fraud displays a lack of respect for the process to gain a qualification, thereby no value in the learning or assessment process. This also leaves a student without the required knowledge base for the job, or the correct level of training to be safe in the workplace. This student could not be trusted and should be denied the chance of reassessment.
- II. No, if there is a risk to the public or fellow workers, the individual should be removed from the workplace immediately. Then if being considered for reassessment, arrange a suitable time and place.

- III. The employer if they do their own training, the training organisation if the training was external and the assessment was not adequate. Possibly the worker, if it has been determined the issues have been a result of the individuals own actions that are unsafe habits that have built up over time.
- IV. Possibly an external organisation.
- V. Depending on the circumstances. High risk work may require a higher level assessor to ensure adequate assessment procedures are followed. The current normal procedure should be used in the first instance in regards to the lodging of the assessment. The employer should be notified of the results and normal record keeping done.

ASQUA's involvement should be at the auditing stage only, unless the result of the assessment demonstrated the individual should never be certified in that specific qualification.

C. Yes. For those students who get caught up in a fraudulent organisation which has been the case in a number of situations such as the Hospitality saga a few years back.

The Government should fund this as the cost would be too great and unfair to RTOs that do the right thing. The Government has a much better chance of recouping the costs from the fraudulent operators.

D. Assistance could be set up to assist those of lower socioeconomic backgrounds where needed. Again this can only be set up through the Government.