



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:

Start with the fundamental to assessment: quality of assessment starts with good training package assessment design and appropriate developmental processes:

Numerous issues have arisen regarding the quality of training and assessment across many of the agrifood industries over the last 4 years. Many of these issues have their origins in poor or vague assessment frameworks or assessment requirements within the relevant training packages. As competition amongst RTOs increases, this has led to some RTOs interpreting the assessment frameworks in a minimalist, most cost effective way to satisfy assessment needs. The net result has been participants being signed off as competent when in fact they do not meet basic industry competency in the areas that they are now deemed “qualified”. Cost effective assessment and overall RTO organisational pressures provide additional impetus for RTOs to meet employer or client expectations, receive completion payment regardless of quality.

It is essential that the training package assessment requirements are written in such a way to leave very little room for interpretation of what industries expectations of competency is.

The new “streamlined” units of competency under the new training package arrangements are also inadequate. In fact they actually can be seen as detracting from strong assessment requirements. Original concepts of competency was based upon possessing the skills and knowledge to complete a work task to industry standards. The new template of the new unit descriptor has deleted any reference to knowledge which is often fundamental to being competent in the particular area. This has led to RTO’s dumbing-down knowledge or limiting its scope and depth due to cost imperatives. This in turn has simplified competency to a single demonstration of skill which from an industries perspective is far from adequate or considered quality training and assessment.

The training package development process:

RTO’s have too much influence and say over the development of assessment requirements in the training packages. Strong demand for qualifications on the National Skill Needs List and working visa opportunities or fee for service student desired qualifications have driven RTO assessment behaviour. In many of the agrifood areas large and lucrative demand for qualifications have driven RTO desire to make assessment processes as cheap and as minimal as possible. An example of this in the agrifood industries have been industries requirement to have a student have work placement or be assessed in the workplace. However RTO’s have campaigned against this requirement in order to keep their cost low or their inability to provide the student with the workplace. In many of these cases, strong RTO lobbying of smaller industry stakeholders, State Training Authorises and training package developers have resulted in industry not able to achieve what they need in order to improve the quality of assessment in their industries.

Conflict of Interest:

In some training package development areas the RTO has also been contracted by training package developers to develop the assessment requirements in a particular area which they are also training in. In some instances industry has deemed this to be a conflict of interest.

Conflict of interest also contributes to poor quality of assessment and training when RTO’s are asked to both train and assess their own students.

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:

No comment

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:

No comment provided.

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:

No comment

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:

No comment provided.

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:

No Comment

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:

As discussed in question 1, RTO's should not be involved in the development of training packages especially relating the assessment requirements. Industry should have the final or only say in the development of these assessment requirements without the influence of RTO's. This would increase industries confidence in the assessment process.

Across the agrifood industries different sectors require different models of independent validation of assessment. Government should not take the approach that only traditional "high risk" industries should be involved in validation of assessment. Many agrifood industries who are not traditionally "high risk" are still calling for independent validation of assessment due to poor quality graduates. Industries such as baking and veterinary nursing would be not be considered "high risk" from a governmental perspective but none the less have major issues with poor quality of training and assessment with in them. Poor quality graduates who have been deemed competent from these industries still pose a food safety or animal welfare risks respectively.

Independent validation of assessment options should be available to industry on an optional basis not mandated due to perceived risk. Industry associations that have the desire, capacity, understanding of assessment validation techniques and industry specific technical expertise should be the organisations that regulate validation tests or validated assessment resources.

Validation of assessment should be a pass/fail dichotomy. If a candidate is deemed "competent" by an RTO than it is assumed that they are able to do the job role relating to that qualification. It is the responsibility of the RTO to identify non-competency of the candidate not the external industry body.

Any externally administered validation tests needs to be current and varied to ensure all dimensions of competency are satisfied. Due to the poor quality of some graduates external validation of

assessment it is now required to re-instate industries confidence into the Australian VET system in many industries.

Results of tests should be made available at an RTO level, this would allow greater transparency, builds consumer and industry stakeholder awareness and choice when selecting RTO's. Often students and sometimes industry are unaware of what a particular job role requires. As such in some instances the "course" or RTO they are using is inappropriate for the job role or industry. Graduates who are unable to obtain or maintain a job in the area that they are "qualified" in may not equate this to poor quality of training and assessment of the RTO.

Currently one RTO in the agrifood industries had 6,500 enrolled CIV Veterinary Nursing as at October 2015 and were enrolling students at the rate of 50 a week. Industry intelligence suggests that there are only 2500 veterinary practices across Australia. As such, it will be nearly impossible for students to do any workplace training let alone have candidates deemed as competent at the end of the course.

Passing an externally industry validated assessment process would validate a candidates skill and allow them the confidence to apply for and maintain a job in the industry of choice. It would also redeem lost confidence by industry in the VET industry.

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 very important that "industry" is determined to be the relevant industry/employer association who has the capacity, understanding of vocational education and training, and technical requirements of that industry to be the validating party. It is not appropriate that a local employer near an RTO be used to validate assessments that relate to nationally recognised, transportable industry qualifications. Most often than not local industry do not understand the issues relating to VET or even have the basic knowledge of the dimensions of competency. Further many of these local "industry" stakeholders often do not hold the qualification in the area that they are being consulted on.

Due to the declining quality of graduates from RTO's there is an ever increasing interest from industry to externally validate their skills and knowledge. However, industries interest in independent validation of assessment varies amongst the sectors under the agrifood area. The capacity of employer groups/ industry associations who have the skills required to validate the assessment also varies from industry to industry. For those industry sectors that are interested in independent validation of assessment, the government needs to assist those industries capacity and capability in the validation process.

The veterinary nursing industry was involved in one of the validation of assessment pilots conducted in NSW in 2014. Despite industry ownership and strong participation, the assessment resources have not yet been mandated or used. This has occurred because RTO's involved in the pilot have refused to pay a small cost recovery fee in order to manage and maintain its currency and validity. The industry association itself does not have the capacity or financial resources to manage this. Small funding arrangement would assist with the ongoing viability of the validation process which would include the updating and review of appropriate externally validated assessment materials.

Smaller industry associations or those primarily composed of small to medium enterprises (SME's) do not have the financial capacity to develop and maintain resources (both assessment resources or external exam based resources) to validate training and assessment in their industries.

Many of these industries rely on voluntary industry stakeholders that have the expertise and desire to maintain the professionalism of the industry to develop assessment strategies or resources in their industries. Government needs to support industries desire and enthusiasm and will to do this especially in industries that are characterised by SME's.

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:

Industry (as defined in question 8) could be the best determinant of the way in which independent validation of assessment could be applied in their relevant industry sector. It is not feasible for existing regulators or other organisations that specialise in assessing students to take on this role. External validation of assessment should be conducted by organisations that have the specific technical competency, knowledge and expertise in VET. It is inappropriate for existing regulators who do not have the technical expertise in the relevant area to be the validating parties.

Best practice models for and guides would be helpful. However, if they are only “guides” and not mandated it still allows RTO’s to apply them in the most cost effective/basic way. Only when are they mandated in the relevant training packages and auditable will they be effective.

The development of national industry – validated model assessment process and tools could also assist in increasing high – quality training and assessment. If a national industry-validated model assessments were embedded into the assessment conditions and requirements for each unit RTO's would be required to implement them.

The specific models for industry validation should be left up to each industry (as defined in q 8) to decide. A one size fits all approach will not work even within the various sectors of the agrifood industries. As previously discussed in question 7, external validation of assessment should not be determined by traditional “high risk” definitions of an industry. Other issues such as animal welfare, food safety, environmental or public health risks should also be considered when looking as external validation in assessment.

External industry validation of assessment as a criteria for government funding could be a consideration but should not be the only consideration. Poor quality graduates are still being delivered to industry regardless of the means in which the qualification is being paid. In the case of the veterinary nursing industry and the baking industry many of the poor quality graduates are paying large fees for these qualifications on a fee for service basis despite in the case of veterinary nursing never able to obtain a job in this industry.

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:

There is a role for industry to develop resources outlining VET graduates but the financial and VET technical assistance from the government.

There is a potential to clearly define the terminology of “competent” to industry and the general public. Despite there often being poor quality of graduates unable to do a particular job role, there is also a need to educate employers. Stakeholders need to know the difference between a qualified person or “tradesman” to that of a craftsman who is able to do the job role to high industry standards in a minimal amount of 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:

No comment

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:

No comment.

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:

No comment