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: ☒ Individual   ☐ Organisation

2. Full name: REDACTED

3. Organisation (if applicable):   REDACTED

4. Please indicate your interest in this discussion paper: Industry RTO

    (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:

Any amount of RTO's should be able to deliver TAE quals. There is a dilemma in the TAE space of the increasing "academic" influence on what is required. It is interesting to observe that many in this space who take the high ground in the debate are now getting divorcing themselves from the basics of VET i.e. Workplace Training and Assessment.

The restriction on provider would increase the costs to isolated and regional RTO's. No one seems able to define what is high quality provision in a manner that is inclusive to all sectors otherwise the current situation would not exist.

Restriction of RTO's from issuing to their own staff has the potential to cause excessive cost and time for regional organisations. This might be a case of be careful what you wish for. I would be happy if there were no exceptions if it were introduced e.g. Regional TAFE's would be required to seek an external provider, I think not. My experience of internal development is very successful as the individual can be moulded to specific tasks and through workplace exposure develops good skills.

RPL for TAE.

To not allow RPL for TAE would go against the principles of our current systems. I personally believe that there are cases where RPL is very relevant and applicable. The same fundamental issue keeps on re-occurring i.e. what is a rigorous assessment process.

Changes to TAE Assessment Skills

TAE should only be delivered by persons who can demonstrate a long term and diverse range of experience in VET delivery. I am aware of some deliverers who have only taught TAE and have no other experience.

I am not sure there are circumstances that have been demonstrated where higher qualifications necessarily improve the quality of training. There needs to be more focus upon what is required for students to achieve in the workplace which includes employees of RTO's.

TAE needs to have a practical component before qualification is finalised. In some cases this may take some time. I believe that assessors in particular must do real life assessments before qualified as an assessor. This may mean that people can complete the work of the qual but then have to do some sort of application process. In my environment we expect a recently qualified TAE graduate will need perhaps 6 months before there is confidence in their assessment skills to be used commercially.

Entrants to the TAE Diploma should have extensive VET experience. At present there is much emphasis on the qualification and not the outcomes.

- Should the TAE Certificate IV be changed to a core unit on the design and development of assessment tools? How would this improve assessment outcomes for students?

  - Should the core unit be the existing *TAEASS502B Design and develop assessment tools* unit of competency? Are there alternative approaches, such as developing a new unit on the design and development of assessment tools?

  - Is the *TAEASS502B Design and develop assessment tools* unit of competency a specialist unit that should only sit at the diploma-level on the basis the Certificate IV is currently designed for delivery to new entrants seeking to be trainers and assessors?

- In the case of making any updates to the TAE, is it appropriate to form judgements based on majority considerations? Or is it too risky to do so? Is it a better basis for decision makers to give strong weight to key stakeholders and the nature of the argument put forward?

COMMENT:

The continual tinkering with the TAE will only have minimal effect on assessment. Firstly the vast majority of qualified personnel are already in the system and secondly unless there are dramatic changes to application of assessment development the status quo will remain.

I actually believe that assessment development principles only should be given in the Cert IV with an elective plus endorsement process as an option to develop assessment skills. The assumption that better assessment will be delivered with another top up of the qualification does not have a lot of value to add to the assessment dilemma.

I don't think that full assessment development itself should be expected of all trainers/assessors new or old. A new person coming into an organisation would be expected to use the established assessment tools. One of the fundamentals reasons there is an issue about the consistency and validity of assessment in qualifications is because the base problem is the same i.e. lack of consistency and significant variation in assessment tools. There should be more emphasis on conformity of assessment tools and assessment to Standard.

Judgements on TAE

I think general industry has been poorly supported and advised by the "key stakeholders" who in many cases have vested interest in outcomes. It is obvious from the discussion paper that many recommendations of the advisory group are based upon the big end of town. There needs to be broader and more innovative approaches taken to achieve better results. General advice should be considered from the majority not a few selected individuals.

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:

Need for a National Group

There is a need for more focussed development opportunities; whether this should be the role of another bureaucracy is debatable. The real issue that needs to be addressed is the profligration of commercial advisors selling solutions and professional development. The government rather than fund another structure should put the funding into supported development. As a small regional RTO we see little value in another organisation that is created on the premise that improvement across the board will occur we already disadvantaged to do cost of P.D.

The only purpose of a new organisation would be to provide development and improvement activities for VET providers. Many of the suggestions within the discussion are promoting a compliance and regulatory role of sorts which is already covered by ASQA.

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:

The organisation should be focussed upon supporting development of quality training through coordination of development programs if it exists at all.

I see no role for registering of practitioners, interacting with industry (as this only distances RTO's from Industry interaction and there are already organisations that advocate for VET assessors and trainers).

5.   Discussion questions – models for a VET professional association:

- Which of the suggested models for a VET professional association would be considered most preferrable 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:

The supported model would be A, but not a supporter of the concept.

If an organisation was formed it would be unlikely to be inclusive of all sectors of this diverse RTO network, would add another expensive organisation into an already crowded space.

There should be no compulsion to join or to fund on behalf of RTO's. Compliance with ASQA is already an expensive exercise without more cost being added. Too much good training is being lost due to cost pressures.

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

- 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:

If industry is so worried about the standards of training they need to make a stand against poor providers. It is interesting that much of the pressure on quality of training is actually exacerbated by employers who are looking for and using cheap/fast options.

Industry must be encouraged to appreciate that quality of training generally comes at a cost to them and the RTO.

I would like industry to put more focus upon uniformity of assessment tools and assessment levels. It is inevitable that if you have a hundred different assessment processes for a qualification you will get a wide range of outcomes.

The dilemma with looking for "industry" involvement is there is little uniformity of industry and industry types even within relatively small geographical areas.

The use of industry personnel in assessment validation is incredibly difficult to organise let alone achieve effective validation. Expecting an industry expert who may not understand the mechanics of specific competencies and/or the machinations of compliance is a nightmare for many providers including those that are actually embedded within industry. Our common experience is employers saying to us that "you know what is needed, do it". That doesn't help our 5 year validation program.

Emphasis should be put upon the system being improved; I believe that systems and regulatory controls are available but just not being enforced due to capacity/capability issues. In fact I feel that the onerous burden and prevailing fear of non compliance is having effect on training provision.

The concept of external tests for everything is ludicrous, unworkable and not viable. We would just see the growth of a new and expensive industry where I would be designed by external assessor

providers. This "big brother" stuff may be sought by some cohorts but in regional and practical skill based industries would become a nightmare.

I repeat, effort should be made to continue finessing the system we have got.

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:
Role of Industry

While industry organisation play a major role in setting required standards etc. it is very difficult for them to understand the training system we work under. Our experience has shown industry groups may set an agenda that is not inclusive of all parties.

There needs to be some debate to introduce variability in the definition of industry in regard to validation. Industry and enterprise RTO's for example struggle on the concept of getting external validators when our assessors are working and operating in industry daily. In contrast we compete with commercial RTO's who have no direct communication to industry and are supported (rightly) to have a relationship with that industry.

I don't believe that in general that industry groups have the expertise across the board to validate assessment. Industry certainly should have a say on assessment practices and requirements but the complexity of the validation to show compliance of tools is generally beyond the average workplace operator.

There is a need to increase industry willingness to participate with both capacity and capability.

I think industry needs to stand up. In my view the burden of compliance and assessment development is off loaded to RTO's. The RTO covers the costs etc. of the process.

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:

I don't think that independent validation is well enough articulated. More information available giving examples of best practice and options would be appreciated by those doing the process.

Our experience in the field suggests that there is not a one size fits all.

The costs of these processes need to be considered, as validation is a very expensive process to do effectively. Again one by RTO at no cost to "industry/employer".

We would be happy to participate in the development of assessment tools that meet industry and compliance requirements.

I think there should be independent assessment of high risk cohorts but in the context of compliance.

If independent reassessments are required then the government or industry should pay not the RTO. This becomes a bottomless pit of expenditure.

I think the regulator should be working harder to week out what is obviously low level training and assessment. A few hours on the internet looking at promotional materials can pin point hundreds of examples of variation of learning and assessment. There is much more that could be done, as a whole the training industry and ASQA has become obsessed with compliance documentation and not the training quality.

Two examples quickly come to mind where provider A delivers high risk competencies, a unit taking 6-7 days intensive practical and theory with pre requisites internet finds same competency unit delivered in half a day by provider B. This is outright dangerous and irresponsible.

Example 2 Provider of a Cert IV takes one week full time to complete qual ($3,000) and competitor takes 4-6 weeks full time ($10-12,000).

I think our fundamental system is good but for whatever reason it is plagued by dodgy activity which appears to be condoned, due I believe in lack of resources to properly examine. In the examples given above the delivery of the short versions are by high profile providers, the longer intensive training is by two very small industry RTO's. Herein lies one of the issues.

If cohorts are required to be reassessed it should be managed by ASQA not with the creation of a "new" industry where similar commercial driven groups will see a new money making venture on the horizons to move into and the training cycle will repeat .

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:

Yes would welcome resources that outline graduate outcomes.

There is a need to resolve terminology and outcomes. Employers need to set the levels they accept as job ready. I think that there are some issues around expectations of some employers. A Cert II or Cert III in most circumstances are a starter quals that give basic requirements. There is little better than on job activities to confirm and develop skills this is lacking in many examples.

The same argument applies in effect with CERT IV in TAE. I expect a graduate to understand the principles of training and assessment. Have a rudimentary knowledge of the process but I dont expect them to walk straight into the classroom or a workplace without intensive induction and review of requirements along with development exercises. This has been one of the issues with TAE that it will produce a readymade trainer assessor.

For example if a Civil Engineer gets a job upon graduation is it realistic that they can design and manage a major infrastructure project upon starting, I think not. There needs to be some perspective here.

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:
- I think the standards are already there but just not applied.
- I am not sure as we retain all assessment, but would expect improvement.
- Again there's an implication that assessment materials e.g. test, projects are available. In skill based competencies in many cases it is about practical demonstration. I repeat the mechanisms to regulate this are already in place.
- I see no value add for training only RTO's our experience in similar circumstances allows the escalation of cost for students due to significant increase in assessor costs.

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:
- There should be more capability and focus on outcomes to balance a system that has become paper centric to an evaluation of outcomes process.
- There is a dilemma in assessment standards that needs to be addressed in that the variation in assessment is perpetuated because in many cases people believe they are applying valid assessment. This cohort needs assistance and direction from the system. A perpetual nervousness exists for RTO's however well-meaning they are in regard to assessment compliance. These groups should be supported and encouraged. On the other hand there is downright deficient assessment activity that needs to be weeded out. I think there are already controls for ASQA.
- The RTO characteristics should be carefully considered before action is taken.

Repeat offenders should be weeded out sooner rather than later. The real difficulty faced by an RTO is whether ASQA Auditor will deem your assessment tools compliant, and until that activity occurs there are few mechanism for small, regional RTO's to have the guidance required. I find it offensive that a solution touted is to engage expensive "specialists" to review assessment tools usually in a skill or industry of which they have no skill or competency. I would like an ASQA support mechanism where discussions could be held with audit representatives or to evaluate and advise on compliant tools and also Training and Assessment Strategies priior to adit as an improvement activity.

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:

Where areas of high workplace and public risk is involved I think there should be a right to remove the qualifications and reassessment required. Examples may relate to Heavy Vehicle and Machinery Training.

Any scheme for reassessment should be at the extreme end of any situation. If fraudulent activity has taken place and the student has been knowingly complicit the qualification should be withdrawn. While it may be difficult to differentiate but a trainee who has undertaken training in good faith and been a victim of an unscrupulous operator, there must be some benefit of doubt given. We regular see issues with RTO's have been more interested in the quick dollar and not the outcome.

Ambivalent re time frames for cancellation RTO should bear the cost if they are found to be deliberately rorting the system to have quals rectified.

Re assessment in itself problematic as time lapses, with the old adage "use it or lose it" being relevant to training outcomes. I am confident that of a cohort from a qualification e.g. TAE were re assessed after twelve months there would be parts of the qualification if not practiced would be difficult to recall, how do we manage that. In essence the assessment result on the day is generally the only material for the RTO.

Re assessment may not necessarily give the right result if good industry knowledge of specific competencies are not applied. Therein lies one of the key problems in this whole discussion, while the so called assessment experts may well understand the format they espouse they would rarely have wide ranging industry skills and knowledge to access specific competencies, and skills in industry.

Tuition Assurance

Again trying to fit such a diverse range of bodies under one scheme is problematic due to variances. Why should I pay for the failings of other organisation, membership should not be compulsory unless the government funds it at no cost to individual RTO's.