



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:

- *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?*

This is difficult as what would be the selection for reducing the number of RTO's and who determines the number? Also reducing the number may lead to an insufficient number of RTO's to meet the needs of industry. The quality of the Certificate IV TAE delivery and assessment should be the focus not the number of RTO's.

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

If the RTO can manage the conflict of interest with the trainers and the training package requirements as evidenced by the assessment process then an RTO should be able to issue the TAE qualification. It is a case of ensuring the RTO meets the "Standard for Registered Training Organisations (RTOs) 2015

- *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 qualification or skills sets granted with sufficient rigour to ensure the quality of student assessment? Should the practice be restricted?*

No it should not be restricted, again it is a case of ensuring the requirements of the Training Package and “Standards for Registered Training Organisations (RTOs) 2105 are being met.

- *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?*

This does not guarantee high-quality delivery as the VET practitioner may have moved from RTO to RTO and not gained significant experience. Of more value would be ensuring they have practical experience in Design, Training and Assessment, Compliance with ASQA regulation, knowledge of the national system and relevant education theories.

- *What circumstances would support 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?*

Support for higher level qualifications as set out in the 2015 RTO standards. Do not support the requirement to hold a university qualification as they are more generic and do not necessarily support all the areas of knowledge requirements for the VET sector.

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

The current TAE Cert IV and Diploma already include a practical component. If the suggestion here is to have work practice this would be difficult to meet. If the volume of learning was being met by all RTOs there would be no need to prescribe a work practice timeframe.

- *Should entrants to the TAE Diploma be required to demonstrate employment history in the VET industry 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?*

If the quality issues of the Certificate IV TAE were addressed there would be no requirement. Also as not all persons who hold a Diploma work in the VET sector utilise it for formal RTO requirement i.e. they may work in large organisations who do not deliver accredited training, this would be an onerous requirement for that Cohort.

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:

- *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?*

No, in reality all trainers and assessors do not and do not need to design 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?*

Yes, as with the point above not all trainers and assessors design and develop assessment tools.
- *In the case of making 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?*

No, changes to the TAE should consider all aspects and sectors of the industry, including small, medium and large RTOs, industry requirements and also the training and assessment functions within RTOs and non-RTOs.

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:

- *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?*

No, there is no need for the establishment of another professional association. If the quality issues of the current TAE Certificate IV were addressed there would be no need for another “layer” within the system.

- *What are the barriers to establishing a nation professional association? How could these be overcome?*

Costs, relevance.

- *What would be most useful guiding purpose of a national professional association?*

In relation to the above points a number of professional associations already exist who conduct professional development activities and provide updates and information and represent their members at various forums. These organisations include ACPET, VELG, AITD etc.

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:

- *What activities would be most beneficial for a national professional association to undertake? For example, would it:*
 - *Co-ordinate, 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?*

Existing professional associations are available to undertake all of the above activities.

Co-ordinate, approve or design professional development programs. Capability frameworks are not very useful at the coal-face.

Given the requirement for all trainers/assessors to currently meet the national standard and no identified shortage of trainers, promoting the profession to attract professionals does not address quality issues of the TAE Certificate IV and does not acknowledge that many or most trainers come from an industry background who would not be considered “professionals” but they are vital in passing on their knowledge and skills.

A professional association for VET professionals would do little in interacting with industry to respond to their emerging needs. I can’t imagine how one association could attempt to

identify emerging needs across all industries (other organisations are in place who have these specific roles).

- *What advantages would there be in 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 RTO?*

No benefit or little benefit. Any resources would be best provided to existing associations to provide/coordinate professional development activities. A one size fits all approach will only lead to generic professional development being undertaken for the sake of a tick in the box.

- *Are there any existing organisations that could fulfil this role?*

In relation to the above points a number of professional associations already exist who conduct professional development activities and provide updates and information and represent their member and various forums. These organisations include VELG, ACPET, AITD, ASTD, AHRI, AIM

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:

- *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 mechanisms 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?*

None of the models. What the VET sector needs to address are the quality issues around the provision of the Certificate IV in TAE as the priority. Not establishing another layer of bureaucracy at a cost to the individual or RTO. Also membership should not be made mandatory.

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:

- *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?*

The key here is to use and enforce the current framework around the Certificate IV TAE.

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:

- *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?*

Industry should not be involved in the conduct of assessment, rather their role is to assist in determining what the requirements for assessment are e.g, the performance evidence, and how many times they should be demonstrated.

- *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 an RTO level?*

Again ensuring that the Certificate IV TAE is a quality program then these requirements would not be needed. Licencing bodies already administer their own external tests.

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:

- *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?*

There are very few industry representatives who have the time or knowledge to be involved in validation of assessment. RTOs are able to develop relationships with industry representatives over time, however prescribing industry involvement results in a tick and flick approach to validation and perpetuates the perspective of industry that training quality is just a process of producing bits of paper because the bit of paper is needed at audit.

- *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?*

Many do not. I'm sure there is great benefit in having industry representatives having a role in validating assessments, however when the key people who are making assessment decisions (ie the assessors) do not have the skills to assess I would suggest that is a far more pressing concern.

- *Is there a need to build industry capacity and capability regarding involvement with training and assessment? If so, how might this be done?*

If the issue regarding the quality of the Certificate IV TAE is addressed there would be no need for this. However it could be considered beneficial for the future.

- *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?*

There would be a cost to RTO's in doing this. If RTOs are meeting the national standards, they should not be penalised with any additional costs which industry may impose.

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:

- *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 method to validate assessment*
 - *Mandatory requirement to lift quality in specific instances where a qualification is identified as high-risk*
 - *Funding requirements, for example, independent validation of assessment could become a requirement for RTO's seeking to access government funding.*

This issue can be addressed through external validation of high-risk qualifications eg. the TAE Certificate IV would be a good qualification to be independently validated periodically, such as when adding to scope or there are significant changes to the Training package or the RTO offers a different pathway or significantly changes their training and assessment strategy.

- *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?*

No there should not, again use the current standards and audit process to manage this.

However there is a strong case for considering mandatory external assessment for Certificate IV TAE as it directly affects the training and assessment of all other qualifications (and is a key to ensuring quality assessment).

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:

- *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?*

No this is not required. Focus resources on addressing the need to address quality issues in the TAE Certificate IV.

- *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?*

There is a need for terminology and the practice of assessment to be revised to ensure there is no difference in the term ‘competent’ as an assessment outcome against a training product and job ready given that competency standards should depict work tasks.

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:

- *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?*

There is no need for the standards to be revised -it is more a case of ensuring the current standards are used and enforced.

- *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?*

No, provided the Certificate IV in TAE quality issues are addressed

- *How could the focus of regulation move to evaluating assessment outputs, such as samples of student's assessment pieces, without incurring excessive costs or imposing excessive burden on RTOs?*

- *Is ASQA the appropriate regulator to oversee tis function, or are there better placed agencies such as firms that specialise in assessing students?*

Industry representatives could be/should be involved in audit activities to provide advice on assessment outputs (and where there is an assessment 'piece' such as a piece of furniture, RTOs should keep a video or photo record for this purpose)

- *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?*

No, the quality of TAE Certificate IV issues need to be addressed urgently to prevent poor assessment.

Students are sufficiently confused between recognised and non-recognised training yet alone navigating a system that has training-only RTOs and then seeking an assessing RTO.

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:

- *How could the focus of regulation move to evaluating assessment outputs?*

Independent, random questioning of completed students.

- *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 an RTO to arrange and fund external reassessment, or should additional civil penalty provisions be recreated?*

Yes for the TAE Certificate IV only

- *To what extent should characteristics of the RTO influence the response? Should the size of the ROT or the number of students involved matter?*

No, not at all

- *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?*

Focus on RTOs offering the TAE Certificate IV and if they have significant non-compliances in assessment evidence, ineffective assessment instruments and processes at audit, remove the qualification from scope.

- *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?*

We support transparency and disclosure, however ensuring the privacy of organisations (eg. regular reporting of common non-compliances using aggregate data)

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 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?*

Yes this provision should be used more often and apply to all qualifications with an emphasis in the first instance on the high-risk qualifications first. In particular, TAE Certificate IV.

Suggest considering the definition of "inadequate assessment".

In some cases the evidence on file does not reflect the quality of assessment. For example, an Assessor could be very thorough and complete the assessment tools but miss ticking each knowledge question but sign the assessment. In another case the trainer may not provide any

training at all and just give the answers to assessment questions telling each student to write the answer in their own words, the trainer then ticks all questions right and signs the assessment.

In the first case there is integrity in the assessment but an error in indicating that each question has been checked. In the second case there is no integrity whatsoever. However at audit there would be a non-compliance in the first case but the second case would be deemed compliant (assuming that the instruments addressed the units of competency).

Yes, qualifications should be cancelled where it is clear that the student is not competent. However, I would suggest that re-training and re-assessment costs be borne by the RTO.

Any reassessment could be focussed on the critical aspects of assessment and evidence for high risk units in a qualification rather than a full reassessment of all components of the competencies and for all competencies required for the qualification.

- *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 re-assessed, 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?*

Students should not be disadvantaged; however they should not be endangered. The standards for RTOs are in place and are a requirement. RTOs should be responsible for ensuring any re-training and re-assessment (or at least paying for the re-training and re-assessment).

- *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?*

No

- *What linkages with income support eligibility should apply for graduates impacted by any recall of qualifications?*

