



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.
4. Organisation (if applicable):
5. Please indicate your interest in this discussion paper:

VET student parent

(i.e. as a student, VET practitioner, RTO, third-party provider, peak body, business, industry representative, regulator or other government agency or community member)
6. 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:

There are definitely opportunities to improve the assessment skills of the VET practitioners.

I am unfamiliar with the TAE certificate, but would be interested to contribute to a discussion about it, should the opportunity arise. I was a high school teacher many years ago and I believe the problem with my daughter's RTO is due to their lack of skills in setting assessment questions and correcting assessments.

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:

Absolutely not. RTOs are already receiving taxpayer dollars through government funding of students. It is entirely the financial responsibility of the RTO to meet standards, not the taxpayer.

If they want to improve their professional development, they need to bear the cost and the responsibility.

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.

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:

I have put a suggestion below regarding industry and how they can be engaged in the conduct of assessment.

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:

Yes, employers would be one of the best methods of assessing an RTO's capabilities.

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:

If a certificate is competency based, should it not be a one size fits all approach to assessments as individual pieces on individual subjects? Otherwise how can employers and students expect consistency? There must be a way to keep amounts of assessment and assessment expectations consistent through each subject and each RTO that delivers that subject.

Something needs to be done in order to provide students with a consistent level of assessment expectation across RTOs. At the moment there are too many differences in the amount and difficulty level of assessments from one RTO to another.

With all the talk about RTOs giving inadequate training my daughter is with an RTO that has swung in the opposite direction. An RTO with incredibly high demands is also a major problem.

Students can have to resubmit assessments a third time at which point they are charged to do. This is a HUGE conflict of interest. This practise of demanding money to reassess must be stopped. If the RTO has problems with assessment questions or marking of the assessment, students are being unfairly charged for the incompetence of the RTO.

Students also are finding it difficult to complete the course in time. They are charged to extend. Again, a conflict of interest! If the RTO has made the course too demanding and set many assessments and/or lengthy assessments then the problem is with the RTO, not the student.

At the moment, the actual reality of the system is that the RTO can be financially rewarded for their lack of assessment skills. This is absolutely ludicrous!!

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:

No comment.

11. Discussion questions – evidence of assessment and graduate competency:

- Should the Standards for RTOs be revised to include strengthened and more specific rules around the conduct of and evidence to support assessment? Which elements that have a clear link to quality of student outcomes need to be strengthened?
- Would a more prescriptive condition of registration, such as a requirement for RTOs to retain all assessment samples for a longer period, improve the quality of assessment?
- How could the focus of regulation move to evaluating assessment outputs, such as samples of students' assessment pieces, without incurring excessive costs or imposing excessive burden on RTOs?
 - Is ASQA the appropriate regulator to oversee this function, or are there better placed agencies such as firms that specialise in assessing students?
- Are there other mechanisms that you would like to see added to the regulatory framework to prevent poor assessment? For example, should training-only RTOs be recognised as a formal part of the regulatory framework?

COMMENT:

Yes, there should definitely be more specific rules around the conduct of and evidence to support assessment. As a concerned parent of a student who is trying to decide if the RTO is competent or not, I am finding it impossible to determine. There is nothing to compare this RTOs assessment with unless I know someone else doing the same course with another RTO. I cannot even discuss it with other students with our RTO as there is not obligation for the RTO to provide opportunities for the students to meet.

There MUST be more focus on the conduct of assessment. Students are at the mercy of the RTO and their ability to competently assess. I am finding that in our case, our RTO lacks the competency to write clearly worded questions and correct the answers properly. I have written them a letter of complaint, but this will not change their inadequacy and any governing bodies will be totally oblivious of this problem unless I make the effort to make a formal complaint to ASQA. Most people will not go to that length as they just want to jump through the hoops and get their certificate.

Here are my suggestions:

1) A better, more accessible governing body than ASQA.

If RTOs are getting taxpayer dollars then part of these dollars should be directed to a governing body that takes any students queries regarding unfair, improper assessment. Students with concerns about assessment conduct should be able to contact someone for guidance. Holding students samples for audits does not provide immediate remedies for problem situations. There needs to be a better help service for students with doubts about the competency of their RTO. Any RTOs to be found to have an issue should be fined or lose their approval to provide VET funded courses. This will indeed then keep RTOs more accountable.

2) A website where all RTOs must provide access to the assessment pieces.

This will enable students and employers to become a regulating force. There should be no need to keep the assessment questions a secret. Students and employers should be able to look up the specific subject and compare the assessment expectations of each RTO.

3) RTOs that provide online study options should be obligated to provide a forum where students can discuss course issues. This allows students to talk to each other about any concerns they might have in relation to assessment. When students tried to do this on the Facebook page of the RTO my daughter is with, the RTO shut them up and ordered them to not post anything negative. The RTO has the complete control and students are kept in the dark about the actual performance and competency of the RTO. Students can only go on what the RTO chooses to tell them. This is completely unacceptable. Students MUST have the freedom to talk to other students of that RTO in order to keep the RTO accountable.

4) RTOs should be obliged to give students access to complaints they have received. My daughter completed two subjects before I wrote the complaint to the RTO. When the RTO called me about the complaint, they informed me that they had just finished doing an overhaul of the two subjects due to the feedback they had received. This is problematic. The RTO's incompetency cost me time and caused my daughter and me a lot of stress. Not once through the two subjects when my daughter called for help did they indicate they had issues with it. The way things are structured now makes it too easy for the RTO to make out that the problem is with the student and not with them.

5) There should be a website for students and employers to rate an RTO. It could work in a similar way to an ebay feedback system. There could also be a section on this site where details of any governing body intervention has been needed.

4) It must be an obligation of the RTO to provide students with a link to the RTO assessment website (where all assessment questions are listed) and an RTO feedback site (where students and employers comment). Students should be required to sign something which indicates that they have been referred to these sites before the RTO signs them up to the course.

This enables industry and students to regulate the RTOs. It also enables students and employers a chance to compare and see how the RTO performs in terms of assessment and quality of training.

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:

Yes, RTOs should be financially penalised if they are incompetent in their assessment.

If a student has been disadvantaged due to poor assessment and a governing body has deemed it to be so, the RTO should refund the student an appropriate portion of the subject fee. This could allow the student the chance to pay to redo the subject if they are not competent. If no student is involved a fine should be given.

I have addressed the last two questions previously. There is a need for much swifter action. There is a need for much more transparency and disclosure. All things should be disclosed for all potential students and employers to see.

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 on this.