



## Template for submissions to the *Quality of assessment in vocational education and training – Discussion Paper*

### Key consultation areas

The Department of Education and Training (the department) seeks stakeholder input on the *Quality of assessment in vocational education and training – Discussion Paper* (the discussion paper). The paper covers the following broad themes to improve assessment in vocational education and training (VET):

#### Chapter 1: Foundation reforms

- ensuring the requirements for VET teachers and trainers provide the strongest platform for high-quality assessment
- ensuring those teaching VET skills are highly competent professionals with high-quality, contemporary skills in assessment.

#### Chapter 2: Reforms to the assessment of VET students

- assuring the quality of assessment through industry engagement with assessment review and control mechanisms as a gatekeeper before qualifications are issued
- ensuring employers have clear and realistic expectations of VET graduate capabilities which align with the assessment of students.

#### Chapter 3: Reforms to the regulatory framework

- improving the detection of poor quality assessment
- ensuring quick action can be taken against registered training organisations (RTOs) delivering inadequate assessment
- managing the consequences of inadequate assessment by removing invalid qualifications from the system where necessary and supporting students if this occurs.

### How to provide feedback

To support the Training and Assessment Working Group to provide the Australian Government Minister for Vocational Education and Skills with recommendations on how to improve assessment, stakeholder consultations will begin with the release of the discussion paper in January 2016 and continue through to Friday 11 March 2016.

Respondents may provide feedback on some or all of the discussion paper's themes. To assist with the compilation and analysis of the views of all stakeholders, respondents are encouraged to provide feedback via this preferred submission template, with attachments as required. Submissions in alternative formats will also be accepted.

All written submissions to the discussion paper and queries on the consultation process may be directed to the department via email at [trainingpackages&VETquality@education.gov.au](mailto:trainingpackages&VETquality@education.gov.au).

All written submissions will be made publicly available on the department's website, unless respondents direct otherwise. See the [terms and conditions for public submissions](#).

### Submission details

1. Submission made on behalf of:  Individual  Organisation
2. Full name: 

REDACTED
3. Organisation (if applicable): 

REDACTED
4. Please indicate your interest in this discussion paper: 

RTO and VET Practitioner

(i.e. as a student, VET practitioner, RTO, third-party provider, peak body, business, industry representative, regulator or other government agency or community member)
5. Do you want your submission to be published on the department's  Yes  No website or otherwise be made publicly available?
  - a. If yes, do you want your name and organisation (if applicable) to be published alongside your submission, OR would you like for only your submission to be available and your details kept anonymous?  Published  Anonymous
  - b. If no, please advise the department upon submission that you do not want your submission to be published or otherwise be made publicly available.

## 1. Discussion questions – RTO limitations:

- Is it appropriate for relatively large numbers of RTOs to deliver TAE qualifications or skill sets? Should the number be reduced to a targeted number of RTOs focusing on high-quality provision?
- Should RTOs be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors?
- Are TAE qualifications and skill sets so significant that evidence of competence should not—or cannot—be appropriately demonstrated via recognition of prior learning?
  - Is recognition of prior learning for TAE qualifications or skill sets granted with sufficient rigour to ensure the quality of student assessment? Should the practice be restricted?
- Are there opportunities to improve the assessment skills of the VET workforce through changes to the delivery and assessment of TAE qualifications and skill sets?
  - Should TAE qualifications and skill sets only be delivered by VET practitioners who can demonstrate a specific period of training and/or assessing employment history in the VET sector?
  - What circumstances would support a change requiring some VET trainers and assessors to hold university-level or higher-level VET qualifications, for example, practitioners delivering and assessing TAE qualifications and skill sets?
  - Should the TAE Certificate IV and/or Diploma require a practical component? If so, how long should the practical component be?
  - Should entrants to the TAE Diploma be required to demonstrate employment history in the VET industry before being issued with the qualification? Would this condition help to improve the relevance and validity of assessment? How long would this period of time be?

### COMMENT:

Its not the number of RTOs that is really the problem with with the TAE qualifications, but the quality of the services that some provide.

Undecided re issuing qualifications to own practitioners. Safecity has in the past, but we also seek external validation of our qualifications periodically to demonstrate legitimacy of competence of our staff.

RPL CAN show appropriate competence IF conducted properly.

Putting restrictions on delivery of TAE qualifications MAY provide additional quality improvements ... Definitely yes to the practical component ... A well tuned in VET practitioner can see if a student has the skills pretty quickly, although longer sessions can see the structure more... but are really unnecessary as a demonstrative practice. Perhaps duration is not the key issue, but frequency so

more demonstration of skills across a range of situations, groups and individuals ... even if it is the same training program, different groups of students can throw up different challenges for a trainer/assessor.

Re employment pre-requisite for "Diplomats" ... it may be a good idea. It would mean that the skills required for working in an RTO are not 'green' and the focus can be on the additional skills required for the Diploma qualifications rather than remedial training for the Cert IV material. The downside is that if the diploma candidate student has been employed yet not necessarily active, that cert IV knowledge may not have been properly retained ... so there are two sides to this argument.

## 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:

Trainers and assessors DELIVER training and IMPLEMENT assessment.

I believe that this is a separate issue to the assessment practices of assessors themselves.

The tools developed must be developed by a person holding the TAEASS502B unit, but that does not mean that the ASSESSOR has to hold this unless they are one and the same.

E.g. Most TAFEs and RTO's do not have assessors drum up the assessment tools themselves. Yes, they validate assessment, but do not actually develop them!

To require this as a core competency is demanding more of trainers/assessors than the industry at the ground roots actually requires of them, which runs against the vein of the whole industry... You know ... Thou Shalt Not Expect More Than Is Expected In The Workplace!

I think it is far too high a level of skill required for an entry level trainer/assessor, and this task should be conducted by someone holding the Diploma of Design and Development! There should be at least one such individual per RTO (or all assessments/development/strategies otherwise outsourced to someone who DOES hold that qualification).

I am not sure what the last question is really asking ...



### 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:**

National Professional Association that is wholly government funded and run by industry reps I think would help. Keep fees lower (particularly for smaller RTOs). ONLY a Government funded body can ensure consistency across the board... as each of the current associations are great at some things, and better at others than the other bodies... None are perfect as they all have their member agendas to advocate as that is where their funding comes from. As a SMALL RTO, we simply cannot afford the fees for any of the associations. So, yes to the first question/sub question.

When governments change, so do the priorities ... so there should be a long standing Modus Operandus to ensure consistency for the life of the body, and guarantee that the body will not have that funding pulled.

The problems we have been facing in the VET sector relate to so many knee-jerk reactions without waiting for the last reforms to take hold properly. We have had so many changes to the qualification structure and the content of the qualifications themselves... and NONE of those reforms has fixed the industry.

There are bad apples in EVERY single industry – construction, training, security, real estate, business ... pick an industry and you will see that they ALL have great operators, good operators, and shonks.

Every single industry.

So to think that any of the reforms are going to totally stamp out 'corrupt' operators is a pipe-dream ... although a strong government led body will help with regulating this industry somewhat. Licensing (even in more heavily regulated industries such as security) still does not totally remove the shonks... but it gives an additional layer of scrutiny that allows for the weeding out of those providers that are not doing the right thing.

The VET industry has simply proven it cannot effectively self regulate at the moment.

The costs must be affordable for smaller operators.

A tiered structure would not work as it would mean the larger, richer organisations can purchase standardised services that the smaller RTOs simply cannot afford.

#### 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:**

Definitely design AND IMPLEMENT PD programs ... as that would ensure standardisation of professional development across the whole industry.

I think all of the above are great ideas.

As mentioned, we are currently unable to afford the annual fees for any of the current associations ... and we attend professional development programs and forums put on by funded government bodies (usually the better source of information).

At a national level it will ensure consistency of outcomes across the whole VET sector. Otherwise there would be variations in skills according to location or financial standing.

## 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:**

B is our preferred model. If Government run and funded, there is standardised PD across the board... no questions. If this is the option, then it should be mandatory, although fees associated with membership would need to reflect the size and scope of the RTO ... perhaps on a levy system?

Ensuring fair fees and a return on investment for the RTO is also a good challenge.

## 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:**

I am not sure about this ... so will not 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:

The issues raised in the audits mentioned in the beginning of the document were all relating to the conduct of assessment tools ... and that is covered by the current package. It is the IMPLEMENTATION of the current package that is the issue ... as there are those RTOs that are not following the Volume of Learning guidelines for Cert IV qualifications... and those that are not skilled in conducting assessment.

It is the RTO's that cut the corners that need to be addressed, not the training package itself. The standards are good, it is the implementation that needs to be better policed. There are indicators... those that promise short, fast, cheap programs. I bet anyone enrolling in a \$290 course for the Certificate IV In Training and Assessment is not getting the skills!

Perhaps testing should be more of a sample rather than across the board (with the sample pool generated after AVETMISS data collection), with a focus on those RTOs flagged as high risk. With the TAE, it would be burdensome if this was required all the time, but once an RTO proves their capacity to ensure the outcomes of the qualifications are met, they may then be in the same random pool as any other RTO. This could be more easily implemented than an across-the-board compulsory external testing regime, which smacks in the face of what the National VET system SHOULD be all about. Its just catching and removing those RTOs that are letting the rest of us down that should be the focus of any reforms... without placing undue burden on the rest of the system.

Its OK to react, but reform also needs to allow the proper implementation of previous reforms to take hold and make a difference before more knee jerk reactions are implemented.

This thorough evaluation of the system is a great starting point, and I can understand the challenges faced by the overarching bodies. Not all of us RTOs are criminally minded. Not all of us are shonks. We may be cheap, but that is for survival because we have no choice but to lower our pricing to try to get SOME enrolments for our higher quality outcomes ... but we NEVER promise short, fast outcomes. Lowering our pricing has hurt our company a lot... and it is because of the lower end of the spectrum that we are suffering. It would be easy for us to also lower our standards with our price, but ethically we have chosen not to do so. I cannot say the same for other RTOs ... as they are not my business.

So, perhaps keeping testing to gap identification, and not mandatory across the board (or you will end up with a very big bill at the end of the day), and a lot of the smaller RTOs which make up a vast majority of the GOOD guys in the training industry will go under as a result.

You cannot skew the industry towards the bigger RTOs as they have more momentum, and therefore change is slow. AND, being large they may not have the ability to scrutinise the outcomes of every single trainer / session appropriately.

OK ... if ASSESSMENTS themselves are standardised, and the requirements / parameters are clearly outlined, then the outcomes will be more standardised.

In reality, there is little 'contextualisation' required to develop good assessment tools across the board if the assessment is criteria based... it can be flexible enough within the requirements for assessment to cover a range of contexts and situations. So, if the assessment instruments are developed by industry as part of the training package development process, then the implementation of inadequate assessment tools would never be a problem, and the assessment tools themselves would not be so flimsy as to not capture a picture on the candidates skills.

**SUGGESTION:** Have the assessment instruments nationally standardised by having them developed by industry at the time of the development/review of the training package itself. This will remove the problem of sub-standard tools being used, and will allow efforts of regulators to focus on the implementation of the assessment tools, and ensure the required evidence as outlined by the standardised assessment tools has been collected and appropriately judged.



## 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:**

Industry itself can discuss what assessment should be ... how to capture / identify gaps in competency and what would demonstrate competency adequately ... AT THE TIME of Training Package Development. Make THOSE assessments as endorsed by the industry developing the training package MANDATORY, and then this will standardise the assessment tools and remove half of the problem. Industry groups and employers will then all have a say in what competency looks like at the grass roots where it really counts.

These assessment instruments should be available when an RTO is scoped for a qualification / unit / accredited course (not publically available as that would allow for 'cheat's in the system to just study the right stuff ... )

Otherwise, employers could sign off on competency before a qualification is issued, although this raises the issue of students that are not currently employed...

Issues of validation include implementation in regional/remote areas, and how the national standardisation would be consistent across regional / remote areas. Who is going to validate the validators?

If an externally administered test is applied, it would be beneficial if the RTO received the results for continuous improvement purposes.



## 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:

Hard to say. We are a remote area RTO and do a lot of training/assessment via distance. We still see competency and obtain the appropriate level of evidence by using technology, but it does raise the issue of location. Many of our students are from other remote areas in other states/territories, and some students are also unemployed, so liaising with candidate employers is rarely possible (unless the employer was directly involved in the enrolment of the student).

For validation purposes, a sound knowledge of training packages and the structure and function of Units of Competency is essential, so much of the validation suggested for employers and non RTO industry would be difficult and may raise more issues than are really present.

Perhaps start with standardising the assessment processes and tools themselves and see if that improves the system, and it will also give scope for ASQA to implement disciplinary action for RTOs not conducting the standardised instruments effectively...

## 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.

Yes. There should be ... so perhaps additional resources to ensure all stakeholders are on the same page.

## 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:

#### SUGGESTION:

**Stronger assessment resources at the Training Package level would improve the standardisation of the assessment tools ... therefore if the evidence is specified clearly enough, then the outcomes of assessment SHOULD be more standardised if the assessments are implemented correctly. RTOs may have the ability to customise these for groups of learners HOWEVER these customisations must be approved by the IRC prior to being used. This will ensure the skills required to be demonstrated as part of the assessment process remain unchanged with the approved changes to the assessment materials.**

**This would be much easier to police than the wishy-washy assessment tool development currently allowed. Some RTOs are rigorous in their assessment requirements. Others are more lax... even for the same qualification. Standardising the assessment instruments would remove this problem, so your focus can then be on sampling the outcomes and focusing on higher risk RTOs based on other indicators such as time from enrolment to qualification issuance, course pricing, feedback and complaints on skills, sample industry snapshot, mystery students (a great way to catch RTOs doing the wrong thing) ... etc,. You can then validate the outcomes by collecting samples of implementation rather than the burden of external validation of processes/tools ...**

**I don't think requiring the retaining of evidence for longer to be much of a quality improvement strategy ... we already hang onto everything for AGES (well beyond the required 6 months) and that does not indicate how well we assess the students!**

## 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:

Depends on the focus of regulation ... is it to name and shame ... is it to find non compliance (and therefore potentially start the role of witch hunting where all RTOs under scrutiny are guilty unless proven innocent such as some of the older school regulatory bodies were prior to ASQA becoming the national body)... or is it to actually make examples of errant organisations to discourage similar activities within other operators? Depending on what your focus will be will depend on the resulting regulatory actions.

Forcing small RTOs to comply with expensive options could actually close the RTO ... although that may also be detrimental if the RTO was not systemically failing the VET system.

Scale and scope would have to be taken into consideration ... both scale and scope of the RTO, as well as scale and scope of the identified problem. E.g. an RTO non compliant in 20 assessments over 3 qualifications over a period of 2 years with a small two-man training/assessment team is not quite as problematic for the entire industry as a larger RTO systemically failing their system with (say) 500 assessments over 15 qualifications over a period of 6 months with a staff of 50... The larger RTO would need a larger sanction/fine/slap/shame as anything too small would not be affective in discouraging the behaviour. In addition, is it a systemic problem or is it just a minor oversight? So scale and scope of the actual errant activities must also be considered.

ANY single person being deemed competent in an area they are not actually skilled in is a problem for any industry ... and each of those students would at least need to be reassessed by the system

and provided remedial training (perhaps any regulatory action should also cover those costs)... but it also must be a proportionate response.

Name and Shame is a deterrent, definitely, but perhaps as an example more for repeated misrepresentations and continued behaviour.

### 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:

Wow, some of these are great ideas but would add cost to the industry/small rtos / students.

Reassessment is a good idea with remedial training provided ... and the offending RTO penalty can help to fund these. Perhaps SUSPENDING the qualification until reassessment is completed may also be an option.

Perhaps a levy system per student / certificate issued may help to pay for the regulatory system?

I understand that while there are issues for workers who rely upon the qualifications they receive for vocational licensing or to fulfil employer requirements – at least SOME responsibility needs to be taken by the students. If they have the choice between a \$1000 certificate course and a \$290 course for the same qualification, one MUST expect that there are some shortcomings in the cheaper program. As in all things, you get what you pay for. So for students who go for the cheapest, shortest, easiest qualification they can find (where many of the problems are), the student MUST then be OK with any financial or vocational inconvenience resulting from their decision to shortcut the value of the qualification they sought in the first instance.

After all, shonky RTOs only exist because people are seeking shorter, easier, less rigorous options.

It is, after all, a market driven industry. I cannot tell you how many contracts we have “lost” to organisations that offered shorter, cheaper programs for high-risk security related training – and the employers who have to fund the training are the main instigators in our personal examples.

When students are funding their own training, they often look at their own finances... and that is a driving force with their decision to enrol ... the cheaper, the better as far as their hip pocket is concerned. Many applicants never fully enrol with us because we are not as easy or cheap as others they find online. It is definitely a market driven issue, which allows the ‘shonks’ safe haven and a good pay day.

So, perhaps there will be a change in the market if there is to be a change in the industry. If there are no short, easy, cheap courses, then students will not have the choice to attend sub-standard training and assessment programs.

Perhaps there must be some sort of financial proof as to the viability of the course fees. Can the RTO effectively run the training/assessment program for the qualification, units or accredited courses for the fees they are charging? Are the resources adequate? The onus of proof should be on the VALUE of the training program... will the fee cover the wages required for assessment of the qualification? Is the mode/method of delivery/assessment financially viable relating to the fees being paid by the candidate? This is going to be the biggest risk indicator that will be invaluable to exploit in identifying the higher risk RTOs – justification of their course fees on a cost/profit basis. Is it a viable calculation of resources used vs income from fees?