



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.

GENERAL COMMENTS

As the national council for the Australasian fire, emergency services and land management agencies (AFAC), AFAC provides consolidated feedback from its member agencies in response to the AISC discussion paper 'Quality of assessment in vocational education and training'. This feedback is not in the form of a consensus position but rather, it highlights the individual experiences of agencies as they implement a national system within a devolved operational environment – where experiences are governed by the interpretation of state-based training authorities and independent auditors, which have at times resulted in very different outcomes around similar issues.

In doing so, AFAC premises the comments below, on the following:

Enterprise RTO status

- AFAC member agencies are enterprise registered training organisations (ERTOs) and as such, operate differently to non ERTOs i.e. registered training organisations (RTOs), in that while training and assessing to vocational education and training (VET) requirements is not part of their organisations' core business, this training and assessment is crucial to operational requirements because 'recruits' ('students') must be trained and assessed as competent before they can be deployed operationally
- where the questions in the discussion paper are not relevant to ERTOs, AFAC member agencies generally provided minimalist comment

- there is a strong concern (based on past experience where the VET system has had difficulty in understanding how ERTOs operate, and therefore, difficulty in understanding their training and assessment needs) that discussions around the quality of assessment in VET will be reflective of the needs of public (TAFE Institutes) or private RTOs and in doing so, will include mandatory compliance requirements for all RTOs that are not applicable to the enterprise training model, and will result in 'unintended consequences' for ERTOs.

Training and assessment qualifications and skill sets

- As ERTOs, AFAC member agencies have a strong understanding of the VET system as it relates to their industry, which includes how the TAE qualifications and skill sets, and their constant updates impact on the work and outcomes of their ERTO, and the subsequent impact on their enterprise and employees
- Their experience in staff achieving the TAE qualifications and skill sets has not always been positive and has at times seemed overly onerous.

Standards for Training Packages

- The AISC requirement for Training Packages to be transitioned to the new *Standards for Training Packages* by the end of 2015 has significantly changed how assessment is represented in Training Packages – the result being that Training Packages are in different states of transition (from those that have been totally transitioned, to those that have been partially transitioned, to those yet to begin the transitioning process)
- AFAC member agencies are familiar with the PUA12 Public Safety Training Package, parts of which are yet to begin the transitioning process, consequently, AFAC member agencies generally have varied experience with the new Assessment requirements, primarily through imported units such as *HLTAID003 Provide first aid*
- Some of the comments provided by AFAC members about assessment may be based on their experience with the old, superseded template – AFAC members would need to be involved in implementing the new *Standards for Training Packages* before they would be in a position to comment on the effectiveness of these Assessment requirements.

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?

While all AFAC member agencies are enterprise RTOs (ERTOs) and collectively represent a workforce of over 250,000 personnel, few deliver the TAE qualifications and/or skill sets.

Those with the TAE qualifications and/or skill sets on scope have taken this decision because their experience of using external RTOs has been less than adequate. For AFAC members, the cost of training a significant proportion of their workforce in the TAE qualifications and/or skill sets and maintaining their currency is substantial.

While the members recognise there is a cost to training their personnel in the TAE qualifications and skill sets, there is an even greater cost to these ERTOs and to their workforce if the quality of that service provision is poor and results in sub-optimum performance by TAE qualified trainers and assessors.

The significance of the delivery of TAE qualifications to our industry is great – particularly as the industry has invested heavily in training staff in this area, for example, one ERTO has some 1500 trainers and assessors (Certificate IV and Enterprise Trainer/Assessor Skill Sets) across its operations to support workforce capability in a broad range of public safety disciplines.

Comments provided by respondents have been summarised and grouped according to key themes.

Quality assurance

- For many respondents the issue is not about the number of RTOs that deliver TAE qualifications and/or skill sets, it's about the quality of the product being supplied. Reducing the number of RTOs who are able to deliver quality TAE qualifications and/or skill sets is not advantageous to industry. Limiting quality providers will reduce choice for learners and cannot guarantee high-quality provision.

For some respondents, the large number of suppliers delivering TAE qualifications and/or skill sets is a result of a funding system that has encouraged proliferation without consistent quality assurance, governance structures, processes, standards and oversight to ensure the quality of the product is

maintained. These respondents believe that reducing deliverer numbers may not achieve the result required, unless accompanied by reform in standards, processes and oversight of quality in the system. Especially by removing the 'fly by nighters' delivering the TAE Certificate IV over a weekend.

- Some respondents believe the TAE qualifications and/or skill sets should be delivered by RTOs clearly dedicated to training and education who have a reputation for delivery of quality training in TAE; that newcomers should be given a year of delivery to prove themselves; and that graduate feedback should be considered when determining if deliverers are suitable to continue offering the qualification.
- Respondents agree that all RTOs who meet the ASQA standards should have the opportunity to deliver and assess what is on their scope of registration.
- As one respondent indicated, the number of RTOs registered to deliver and assess the TAE will always be relative to the capability of the registration body (ASQA) to adequately manage the assessment of these providers in achieving quality outcomes. How many RTOs can ASQA actually regulate to ensure the standard wanted by industry?

Market competition and service cost

- It was suggested by one respondent that a recommended price be set for the delivery of the TAE qualifications and skill sets, and that a consistent set of training and assessment materials be available instead of leaving it up to interpretation by each individual RTO. This respondent believed that by establishing parameters around what could be charged, less competent RTOs would be unlikely to compete against RTOs with a reputation for quality service.
- The experience of respondents is that RTOs undercut each other to win business, which has seen the quality of the qualification diluted, with RTOs offering the course over a weekend, online, with no-post course work, etc. Remaining competitive, managing customer expectations and continuing to deliver a quality product, is very difficult in this environment.
- One respondent commented that a great challenge in maintaining the quality of the qualification is trying to explain to personnel outside of the industry why training of our trainers and assessors has to be at a certain level when they believe there are organisations able to deliver the qualification in less time and for less money.

Standards for RTOs

- Many respondents believe the Standards for RTOs ought to be the mechanism to manage quality when delivering products from the TAE Training and Education Training Package (Clause 1.22 and 1.25 of the Standards). These standards do not impose restrictions/limitations on the number and/or range of qualifications to be delivered by an RTO – these standards provide risk management control measures, which in turn result in the culling of non performing/non-compliant providers, thus focusing on and ensuring quality delivery not quantity.
- It was suggested by one respondent that the disparity of quality training provided by some TAE providers should not be resolved by restricting other RTOs; instead, resources directed to strengthening and improving quality TAE training could be best investigated or supported through the regulatory body in providing more audit support to 'rogue' TAE providers.
- One respondent believes that additionally, any selection process or criteria for RTOs to obtain/retain scope for TAE qualifications or skill sets, should provide evidence of additional pertinent factors such as:
 - provider/s location (in remote regions and thin market areas, RTO choice and cost can be extremely constraining)
 - delivery methodology (on-site, classroom/on-line etc.)
 - AQF packaging rules – while many qualifications allow for the selection of TAE units to form the qualification (elective units), when selecting the RTO to deliver said qualification, the restriction of the provider in relation to delivering the elective TAE units may be problematic.

This caution is particularly relevant to ERTOS and/or auspiced situations. In the ERTOS environment, trainers and assessors are not employed as 'professional trainers and assessors' – i.e. often, delivery and assessment are not the individual's primary role, but a second or third component of their employment.

Furthermore, ERTO trainers and assessors may spend a limited time within the training environment (e.g. sometimes 2 years rotation) and therefore cost efficiencies in relation to skills development for trainers and assessors working in an ERTO environment is a prominent factor (ROI).

This situation is most obvious in 'thin markets' (specialist industry sectors) and/or remote regional areas, where the industry sector has little or no choice but to train and assess internally in order to meet the business objective of developing and maintaining a skilled, productive and safe workforce (sequentially resulting and being evidenced by nationally recognised qualifications).

- One respondent raised the fact that not all RTOs deliver training for the same business reason: TAFE – public obligation, private RTOs – commercial viability (core commercial business), ERTOs to train and measure own workforce capability (training not core business function [rarely commercial]). All of which should be considered in relation to possible impacts that may be incurred if reduction to provider numbers is implemented.
- And another respondent felt that careful consideration must be taken to avoid creating a one-size-fits-all approach, which could result in an unintended negative impact on the small number of ERTOs currently achieving quality training outcomes in this area. For example, a requirement that all trainers and assessors involved in the delivery of TAE qualifications and/or skill sets hold university level or higher-level VET qualifications.

COMMENT:

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

The majority of respondents did not support the position that RTOs should be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors.

There were caveats to this position:

- RTOs delivering TAE qualifications or skill sets must satisfy a registration/compliance process that ensures high quality provision and unbiased outcomes
- RTOs should be able to deliver to their own staff, but only with clear evidence that their staff undergo the same rigorous process as any student.

This was linked back to quality – one respondent noted that 'RTOs should not be restricted from issuing their own staff with TAE qualifications and, preventing them, undermines the quality systems in place'.

It was raised by one respondent that many trainers and assessors are self-employed contractors who work for multiple RTOs, and that if restrictions were to be applied, it could impact on VET industry's ability to maintain a suitable and sustainable workforce.

Another respondent expressed some reservations about RTOs being permitted to issue TAE qualifications or skill sets to their own trainers and assessors because this practice could:

- create a conflict of interest in the assessment
- encourage poor practice
- minimise the broader experience students gain by being exposed to different inputs and cross-pollination of ideas.

Finally, one respondent commented that 'Whilst notionally this question appears to have some merit, it may also appear to be a lack of confidence in the regulating of the national standards'.

TAE qualifications and/or skill sets are part of the VET system and therefore those having obtained approval to have and retain these on their scope are subject to:

- mandatory compliance with packaging rules
- mandatory compliance with the training and assessment requirements thereof
- Clause 1.22 and 1.25 of the *Standards for RTOs*.

COMMENT:

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?**

Respondents commented that recognition of prior learning (RPL), or recognition of current competence (RCC), is an entirely adequate process provided the standards and assessment tools are well designed, quality assured, and targeted towards the skills and knowledge required to be an effective trainer and/or assessor. This effective and valid form of assessment must be provided under RTO Standard 1.8 and can provide the same rigour as training and assessment; therefore it should not be restricted. The notion of restricting RPL/RCC as an option for TAE acquisition is perplexing in relation to the *Standards for RTOs*, where the same principles and rules of evidence would apply. Is RPL/RCC not another form of assessment?

However, from the feedback received, there still remain issues around the rigour and quality of student assessment, with respondents suggesting that:

- A suite of standardised assessment tools be created for use by all RTOs delivering the TAE qualification to ensure assessment to the same standard.
- RPL/RCC needs to be more rigorous to include an actual assessment of skills and knowledge (as occurs via a training and assessment pathway), rather than what is commonly occurring – a paper based ‘evidence portfolio’.
- Another issue is that continuous changes in the TAE qualification mean people are continuously upgrading their qualification based on RPL/RCC of the previous qualification, which was achieved through RPL/RCC, and so on. Over time, if quality is lacking in any of these processes it is building on a poor foundation. Ongoing Continuous Professional Development (CPD) managed through a professional association was put forward as a way of maintaining quality.
- Rigour is always arguable in this qualification for delivery, assessment and RPL/RCC. RPL/RCC may miss their total capability across the intention of the qualification. As the VET sector changes frequently, doing the course again would always include additional knowledge and skills.
- The compliance arrangements around the qualification now make RPL/RCC challenging. A person cannot demonstrate currency if they do not hold the qualification that they require to be able to deliver nationally recognised training. They would then be declaring that they are operating without the required qualifications. The processes don’t appear to be rigorous enough right now. RPL/RCC could be appropriate for parts of the qualification (those which can be applied from different contexts – not VET specific units) if there are sufficient quality controls in place (i.e. limited RTOs that can deliver).
- There is some merit to this statement as there have been significant numbers of personnel in the sector who have no formal training in VET and yet gain the TAE qualification but have no idea about the fundamentals. In this case, only offering RPL/RCC to those with VET qualifications above the Cert IV such as the Diploma or a higher education qualification that specialises in adult and vocational education, was supported.
- One respondent suggested the TAE could be considered too complex for full RPL/RCC. For example, a person who is delivering non-accredited training for employees within the work environment may have high level and in-depth knowledge and skills regarding the organisation’s training requirements, processes and procedures, however this person would have limited knowledge and therefore application of the requirements of:
 - training packages/qualifications/units of competency
 - resource development
 - assessment criteria
 - robust evidence in relation to assessing the application of the learning
 - the VET system (including terminology), which is critical in understanding what is required when delivering and assessing in accordance with the *Standards for RTOs*.
- Again, this question was linked to the requirement from 1 January 2017, for people delivering the Certificate IV in Training and Assessment or any assessor skill set from the Training and Education Training

Package to hold one or more of:

- Diploma of Vocational Education and Training
 - Diploma of Training Design and Development
 - a qualification in adult education higher than a diploma.
- (Clause 1.25 of the *Standards for RTOs*)

Alternatively, they can work under the supervision of a person who holds one of the above qualifications. One would think that the above situation would allow for RPL/RCC in accordance with current packaging rules. Under the national Standards, RPL/RCC must be offered to individual learners—unless the requirements of the training package or licensing requirements prevent this.

- Finally, one respondent noted: ‘What is ‘so significant’? Humans have been learning as long as they have existed. It’s part of our evolutionary advantage. Being a good trainer is not necessarily about having high level qualifications based on the academics of training and learning etc. It can also be a person who has innate ability to bring people along on a journey of learning. Every parent has a range of trainer skills and many are very good at it. Being a very highly qualified trainer does not automatically make someone a better trainer. By contrast some of the best trainers just seem to have the ability to engage people to learn better, like the historic Bard and story teller roles in our cultural history.’

COMMENT:

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?

Opportunities identified include:

- Assessment relies as much on well-designed and developed assessment tools as it does on the skills of an assessor. So development of tools that truly assess competence will go a long way to improving assessment outcomes. But long-term learning retention is only helped by practise so assessment has to be continued over time and preferably in the workplace where the skills and knowledge are honed.
- The training and assessment skills should be practised on real work in an RTO – evidence should include what a trainer is currently training and assessing students on, with a workplace visit where possible. References, videos and other evidence are not arduous enough – if it was, we would not have the trouble we are having with trainers and assessors.
- There is definitely an opportunity to improve the skill sets.
- From an ERTO perspective it would be valuable if more emphasis could be put on the ‘development of learning resources and mapping to assessment requirements’ when delivering the TAE. Furthermore, it would be helpful if the delivery of TAE qualifications included more emphasis on ‘clustering’ in both training and assessment resource development activities and the mapping thereof.
- When reviewing the TAE Certificate IV it is apparent that the qualification may be lacking in the requirement for specific ‘Learning material development and associated Assessment tools’ and therefore it is of very little surprise there is a lack of quality assessment.
- More unpacking of units, clustering of units and assessment of clustering.

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 question resulted in divergent views and reflects the different experiences of AFAC members with ‘VET practitioners’ delivering TAE products; comments included:

- Definition of ‘Employment within the VET sector’: in accordance with ASQA <http://www.asqa.gov.au/about/australias-vet-sector/australias-vet-sector.html>, VET providers include technical and further education (TAFE) institutes, adult and community education providers and agricultural colleges, as well as private providers, community organisations, industry skill centres, and commercial and enterprise training providers. In addition, some universities and schools provide VET.

In respect of the above question, what is the definition of VET practitioners? Are they all who deliver training and assessment within the aforementioned environments? The answer to this question impacts significantly on this review and the questions within it.

- No. The benchmark for who can deliver what should be based on an assessment of competence (knowledge, skills, attitude & aptitude) not a period of time in an industry. While research is clear that the longer one delivers training the better a trainer one can become, not all trainers who have been in the industry for a long time are necessarily good trainers. Base it on competence not arbitrary time references that might work for some but not others.
- Yes, persons delivering the TAE qualifications should meet minimum requirements – this is vital for credibility. Measures of quality should also be considered and perhaps stated as a number of hours delivery rather than over a time period (e.g. someone may be in the industry for a year but only deliver once or twice in that time versus a person who has been in the industry for 3 months but delivers training every day).
- TAE qualifications should only be delivered and assessed by experienced VET practitioners.
- TAE training should only be delivered by dedicated VET professionals with a minimum of 5 years of training and assessing in a broad range of contexts.

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?

This question was linked to the *Standards for RTOs* where from 1 January 2017, people delivering the Certificate IV in Training and Assessment or any assessor skill set from the Training and Education Training Package must hold one or more of:

- Diploma of Vocational Education and Training
- Diploma of Training Design and Development
- a qualification in adult education higher than a diploma.

Alternatively, they can work under the supervision of a person who holds one of the above qualifications.

Regardless, one respondent wanted to voice that they were not supportive of holding higher level qualifications to deliver the TAE Cert IV.

Given this, the basis for the question is not clear.

However, respondents did provide additional comments based on personal experience:

- If this was to be implemented there would need to be a clear link between the higher qualification and the qualification being delivered to justify what additional skills and knowledge someone would have by gaining this qualification.
- Most VET professionals with a long career in VET have a degree in Adult Education; this should be the minimum standard.
- Yes, all training packages require the assessor to have relevant current industry experience and yet many people delivering and assessing the TAE do not specialise in adult learning and vocational education. There may even be merit in only allowing the delivery of TAE by those with a VET teaching and learning qualification at AQF levels higher than the Cert IV.
- In the VET sector, higher level qualifications will not solve anything. The VET system has sufficient standards in place at the right level.

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

However, AFAC members strongly support a proposal that requires completion of a significant practical component before a TAE Certificate IV is issued:

- Of course it needs a practical component. This is how you assess skills. It's not clear if this suggestion refers to a practical placement rather than a practical assessment. The nature of VET is about

demonstrating skill on the job, so practical components are necessary. This qualification should not be available as an online-only option.

- How long? As long as it takes for a person to consistently demonstrate the skills, knowledge and attitude over time in a range of workplace scenarios or real workplaces. Where is this idea coming from that you can set a specific time and in that time everyone learns the same? This is an out-dated concept.
- Agree, there must be a practical component for both the Certificate IV and Diploma qualifications, this would increase confidence in the sector and may prevent RTOs from providing very short courses that do not enable practice of the skills being developed, but may be difficult to place time limitations/minimums. Also, this brings up issues for learners accessing a 'live' student base to engage with and may have some insurance implications.
- The Cert IV TAE needs a practical component to clearly demonstrate the student's ability to deliver, facilitate, assess and assist students in a vocational context. The best training for trainers is the 'how to apply these skills in your vocational area'. Professional associations could be a source of industry related qualification and Training Package specific advice.
- Consideration should be given to the definition/context of a 'practical component'. The Cert IV TAE has always been an entry point to deliver and assess accredited training/endorsed Training Package material. There is no doubt that practical application of skills and knowledge is the foundation of a VET qualification. Evidence of application not time served.

One respondent is supportive of at least two (2) to five (5) years' experience prior to entry into the TAE qualification. There are already practical components for the TAE Cert IV and Diploma embedded within the assessment requirements for units – while ERTOs can facilitate additional training and assessment workplace placements (for staff and volunteers), smaller RTOs may not be able to meet this requirement.

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?

While one respondent stated that entrants into the TAE Diploma should be required to demonstrate employment history in the VET industry, respondents generally looked at the question in the context of existing VET structures.

One respondent believed this question needs to be considered in relation to the AQF:

- Yes, you require practical experience to meet the assessment requirements. Consider this very same question in the context of a mechanic, chef, or other VET qualification. The AQF outlines the intent of a Diploma level qualification and it is not intended for entrants to an industry.

Another believed this question needs to be considered in relation to competency-based training and assessment:

- If someone can demonstrate the skills and knowledge over time to the standard required (hence the quality of assessment is the key) then that should be the standard required. It's not some arbitrary time based measure or attendance at work. What does this measure exactly?

While others looked to their perception of the standing of the qualification within the VET industry to provide comment:

- Ideally, learners undertaking the Diploma should have prior experience within the VET industry and again this requirement may increase confidence in the qualification, in the industry.
- The entrance to the TAE Diploma must have worked in the industry for at least 5 years (FTE). Assessment would then meet industry benchmarks and needs, as well as Training Package requirements, with a reasonable amount of time in the VET industry.
- Impossible to answer. People who do the diploma go into all sorts of careers so what kind of industry experience is relevant here? And how do you calibrate the different experiences such that they 'improve the relevance and validity of assessment'?
- TAE10 pathway – TAE Skills Set (evidence of application) ➤ TAE Cert IV (evidence of application) ➤ Diploma TAE. Consideration should be given to an entry requirement being that of Cert IV TAE and/or

equivalence in order to obtain the Diploma. The requirements of the TAE Cert IV would form the entry level requirements and possibly the inclusion of evidence of the practical application of the TAE Cert IV (not just the Certificate) if required in accordance with the relevant qualification requirements.

GENERAL COMMENT

Summary of feedback:

Respondents provided general comments that:

... referenced existing structures such as competency-based training and assessment, the rules of evidence for assessment, funding, regulatory requirements:

- Being qualified should be based on assessment of personal competence over time, and the rate of attainment of competence itself will vary from person to person and individually over time. The issues of validity and relevance of assessment, and whether they are effective as processes are not so much a result of how long a trainer studies, but perhaps more to do with poor design of assessment tools that may not accurately measure against the performance standards and overall meet the definition of competence. The issues are the result of broken funding and regulation models enabling 'fly by nighters' operating principally to make money. Perhaps assessment would work much better if it was public sector based rather than private sector, thus removing the industry imperatives of time and financial pressure.
- It is inappropriate for large numbers of RTOs to deliver TAE qualifications or skill sets due to the evident lack of regulation of RTOs already out in the marketplace. RTOs are delivering qualifications that allow individuals the responsibility to assess the competence of nationally accredited units – of which some from the Public Safety Training Package can cause a risk to the public. (Our industry – Fire)

This practice should always undergo audit to ensure assessors are not ignoring assessment when prior learning is present. Assessment must always be undertaken of evidence presented – this is a grey area for many. RPL/RCC should be assessed more fully within the Cert IV TAE to minimise this confusion – unit to be revised.

RPL/RCC should not be restricted in gaining a TAE, it should just be used appropriately – i.e. ensuring evidence as a whole is current and sufficient and not just valid and authentic.

The industry also needs to keep in mind that the TAE is only Cert IV level and that there are VET qualifications at higher AQF levels that give greater knowledge and skills in adult learning than the Cert IV does. Restricting RPL/RCC for the TAE would take away any incentive for people to gain a higher qualification of level of knowledge and skill in adult and workplace learning.

... considered the questions in an ERTTO context:

- In considering the responses to many of the questions it should be noted that ERTTOs are not established as 'training organisations'. Their core business is not training. Some of the terms like 'VET practitioners' and 'VET industry' are not suitable in our context as we operate differently. ERTTOs exist predominantly to train their own people to their industry and workplace standards – the frameworks and regulatory compliance needs to take this into consideration.

... highlighted their individual, real experience and expressed their disappointment:

- The current quality of the TAE is appalling, with only some successes. Most RTOs – after sending their staff to do the qualification, or upgrade – spend months teaching them what they need to know. The TAE is a flimsy basis on which to develop vocational competencies and qualifications for industries that underpin the national economy. It is most often treated as a 'must have' rather than a value to the trainer and assessor or to the RTO for whom they work.

... suggested opportunities to improve the TAE:

- It would be beneficial if only qualified and time served, experienced assessors deliver the TAE qualifications
- Higher order qualifications do not always correlate with quality and understanding of training and assessment. Limiting the delivery of TAE qualifications would isolate those highly experienced trainers and assessors, holding relevant qualifications but not higher order qualifications. Training delivery should not be limited to those that can fund a university qualification.

- The TAE Certificate IV and/or Diploma should, and already does, require a practical component. Rather than for how long it should be, just be clear that the qualification should include X hrs. of observed teaching or 'X' number of sessions. (I believe it already does.)
- It would be beneficial (rather than employment history) if the Diploma is issued only to those with industry experience and the practical application of their skills gained through holding the Cert IV.

... looked to wider imperatives:

- Consideration may be warranted to review the market environment in which possible key drivers may instigate the urgency of issuing TAE qualifications, for instance circumstances such as:
 - legislative changes/demands within certain industries (e.g. Early Childhood Cert IV)
 - Skills Shortage (e.g. Aged Care)
 - incentives (labour market initiatives).

Furthermore, it is noted that certain industry sectors were identified in the discussion paper *Australian Skills Quality Authority* <http://www.asqa.gov.au/about/strategic-reviews/strategic-reviews.html> in relation to the quality of assessment and assessment tools.

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?

AFAC members strongly believe that the current TAE Certificate IV is an appropriate entry-level qualification for VET trainers and assessors if delivered and assessed to the standards specified in the TAE Training and Education Training Package.

In response to whether the TAE Certificate IV be changed to include a core unit on the design and development of assessment tools, the general consensus was no. The rationale for this position is as follows:

- Design and development of assessment tools is a specialist design skill that few ‘trainers’ should ever be involved in. Put it in the Diploma level. Including this in training level qualifications will have limited long term learning impact on a trainer’s skills and knowledge because they won’t be practising it for long. So minimal improvement impact on assessment outcomes. More effort needs to go into ensuring trainers understand the rules of evidence and principles of assessment and what they mean in application of assessment in the workplace in practise.
- Design and development of assessment tools is almost its own specialist skill area that perhaps should be conducted by people with diploma or degree level background rather than a VET trainer. Let’s not forget that VET trainers are industry based people not academic training program designers.
- Many roles in the sector as trainer assessors do not require the skills to design and develop assessment tools. The underlying principles need to be understood to ensure good assessment practice, but the intent of the qualification to be a trainer/assessor is lost when trying to put all of the different aspects of managing training and assessment into the one qualification. Many professionals are skilled in developing tools but not conducting assessments, the same as writing training but not delivering. The design and development should be a different skill set to the delivery and conducting assessment components. Organisations want their trainers/assessors qualified, but they have to demonstrate competency in a range of skills areas that they will never use on the job. Separating these could assist in reducing the amount of time to deliver the TAE qualification and improve the quality as learners, if they only have to focus on mastery of a smaller number and more specific range of skills.
- Certificate IV is only an entry-level qualification designed to give learners the initial concepts, knowledge and skills. Creating effective and valid assessment tools is a complex task that requires skills and a depth of knowledge, of both the vocational skills and in unpacking units of competency, and some basic design. Ideally this should be undertaken by more experienced VET practitioners. Putting the assessment tools units back into the Certificate IV is too risky.
- The core unit should not be the existing *TAEASS502B Design and develop assessment tools* unit of competency. It would limit training personnel who do not have the option of designing and developing assessment tools – i.e. those in larger organisations. In the CFS, these are designed predominantly by Training Management/Project Leaders only.

- As an ERTO, our trainers and assessors are provided with set instructional materials and assessment tools. They are not involved in the development process. There could be provision to include a unit on understanding the training and assessment development process, but we would not want to see the design and development unit featured as a core unit in the Cert IV.
- Finally, is the purpose of a Cert IV to train and assess or just assess?
 - TAE Cert IV as a qualification should not be reflected as a unit of competence.
 - The qualification as a whole, should be a more robust requirement, and the fundamental qualification in training and assessing.

COMMENT:

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?

The AFAC members did not support the existing *TAEASS502B Design and develop assessment tools* unit of competency being added as a core unit requirement for the TAE Certificate IV. It is a specialist unit relevant to trainers and assessors whose job role specifically includes the design and development of assessment.

Specific responses included:

- See comments above regarding assessment design being a different skill set to a VET industry based trainer. Industry needs trainers who can pick up the training and assessment tools and deliver training and assessment consistently in a range of workplace environments.
- TAEASS502B should not be considered a core in the Cert IV for these reasons and could sit at Diploma level in a specialist Skill Set.
- Designing assessment tools and systems is a separate skillset that not all assessors will have, so no, *TAEASS502B Design and develop assessment tools* should **NOT** be a core unit. A new unit on what makes an assessment task/system work and how to assess, rather than how to design an assessment would be better.
- Core units should include:
 - the design and development of training resource/s (including the requirement of unpacking and clustering, mapping etc.)
 - the design and development of associated assessment tools and mapping.

COMMENT:

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?

The AFAC members strongly agreed that the *TAEASS502B Design and develop assessment tools* unit of competency is a specialist unit and should only sit at the diploma level:

- TAEASS502B should not be considered a core in the Cert IV for these reasons and could sit at Diploma level in a specialist Skill Set. As it stands now, the Certificate IV is currently pitched too high and is too complex for a new entrant seeking to be a trainer/assessor.
- The TAEASS502B unit in the TAE Diploma is better situated where it is, as persons with this qualification would generally be involved in the design and development of training products.
- Currently the TAEASS401B & TAEASS402B encompasses the introduction, planning and application of simple assessment tools and processes. This reinforces and suits the concept of an entry-level qualification. After gaining practical experience in training and assessment it would be a natural progression to undertake the design of tools at the Diploma level.

- Yes, this unit should be revised to increase the flexibility to include those who are not able to design, use and trial assessment tools. The emphasis should be on the learner at all times so core units should be about planning, assessment and feedback. The feedback is diluted in the assessment unit and should be a core unit rather than one such as designing tools that is unable to be met by some.

COMMENT:

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?

It is the firm belief of our industry that the appropriate process for updating or making changes to Training Packages, for making judgements, is to work through the appropriate industry reference committee (IRC) – as has been the experience to date with the Public Safety Industry Advisory Committee. While it is acknowledged that it may be difficult to identify an IRC for the training and assessment material because it is relevant to all industries, similar processes are required i.e. due consideration should be given to comments from bodies that clearly represent agreed stakeholder groups.

Respondents provided a range of comments:

- Considering the VET sector (technical and further education [TAFE] institutes, adult and community education providers and agricultural colleges, as well as private providers, community organisations, industry skill centres, and commercial and enterprise training providers. In addition, some universities and schools provide VET) each provider's circumstance and market are considerably different, which should not be underestimated.
- Updates to the TAE need to consider all areas of industry for which it is catering. As an ERTO, often decisions made to accommodate large TAFE models and small private RTOs do not suit our environment. The key would be breaking the qualification down into the skill sets required by different roles, which would give organisations greater flexibility. The Cert IV TAE (or a Cert III in its place) needs to focus on training and assessment – strip it back to its intended purpose. The VET Practitioner Capability Framework could be used as a valuable guide in this regard. Decisions should be made with the intent of the qualification in mind – why is it in place, what is trying to be delivered, and how to ensure quality and professionalism.
- Finding a balance between strong and not so strong voices is required. If decisions are based on achieving the outcomes required both by industry and the academic world that understands learning, then it might work. Sometimes the majority can be quite wrong.
- Updates to TAE should reflect all industry and therefore all stakeholders (all levels) must be consulted and the nature of the argument should be the key considerations.
- Updates to the TAE should be cognisant of the different types of RTOs – enterprise, private, small, large, public. There is no one-size fits all and we have seen this already in relation to the interpretation of the *Standards for RTOs 2015*.
- It can be too risky to 'form judgements based on majority considerations'.
- It is risky not to involve majority decisions. For a balanced approach it should involve as many informed personnel as possible with the decisions made across a spread of stakeholders – those who are current in use of the unit and not just those who are academically competent.

GENERAL COMMENT

One respondent suggested that:

- The TAE should not be a pre-requisite for training and assessing. Three months (minimum 20 hpw) working with an experienced trainer and assessor should be the pre-requisite to enrolling in a TAE or a traineeship. One cannot learn from a course all that is required to be a trainer and assessor. Working on

the job is a far better teacher and also gives the student a context for the knowledge provided by the TAE.
Pre-learning some could be preparatory, co-learning is ideal.

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?

Responses to this question were divergent. While some respondents see such an organisation as having merit, others do not believe that such an organisation will solve the current issues with the 'quality of assessment in vocational education and training'.

What is evident is that were such an organisation to be set up, the process and maintenance would be significant and to do so, the outcome would need to be similar i.e. significant.

These divergent views include:

- While the concept of a professional support mechanism has merit, one would question the appropriateness of Australian Governments in the funding of such. There are many professional organisations that are financially supported by their membership base. Maybe membership fee structure could be similar to that of VETnetwork Australia, ACPET, ERTOA, IVETA, IEAA, VISTA (ceased operations 1st May 2015, due to lack of membership etc.).
- There are a number of existing organisations and networks who are providing support and professional development options currently. Providing or establishing another layer does not necessarily provide quality or support.
- There is a case perhaps for such an association at the level of people delivering the TAE qualifications as this may be where the most change could achieve the most improvement in standards for the investment.
- Government funding will not solve the issues in the sector. Current VET sector issues are a result of a 'more funding' less governance approach.
- Yes. Recognising VET training and assessment as a profession is an important step for the VET industry. This is recognised in other sectors of education with professional associations for teachers. Recognition will help to educate that quality; professional trainers/assessors cannot just be created by completing a one week training course. Recognition should be for a range of roles in VET, rather than just trainers/assessors.
- A professional association is needed that provides ongoing training (CPD), where credit points are awarded for this training and others as presented to the association. A minimum number of points must be achieved annually to remain current.
- Yes – emphasis should be on practicing VET personnel being part of an association to maintain skills and the currency of skills rather than the constant re-qualifying when new versions of TAE are released. This is the only profession that requires the trainer to redo their training qualification rather than prove ongoing competence and PD through a structured association. In the UK, training personnel form part of the Institute for Learning, you then gain full membership association membership etc. depending on the qualification held. Maintenance of membership involves proof of X hrs. per year of teaching and assessment etc.

COMMENT:

What are the barriers to establishing a national professional association? How could these be overcome?

Respondents identified a range of perceived barriers to establishing a national professional association:

- Cost to both the practitioners and RTOs, time, effort, follow up etc. Lack of willingness to participate. Many trainers are very much part time and the training activity is a nice addition to a career rather than a career in itself.
- Getting a consistent agreement across all stakeholders as the group is so large and diverse.
- Over-regulation risks to organisations have seen many opting out.
- Professional association does not guarantee quality.
- The establishment of a professional association has been researched and discussed for many years. The ownership of the association has always been contentious – and highly competitive.
- Barriers are created when the benefits and current issues are not clear. Funding and commitment are obvious barriers.
- The diversity of the VET sector providers is a barrier (technical and further education (TAFE) institutes, adult and community education providers and agricultural colleges, as well as private providers, community organisations, industry skill centres, and commercial and enterprise training providers. In addition, some universities and schools provide VET).
- A substantial amount of trainers and assessors are independent consultants (mobile workforce), registered with RTOs in accordance with their scope, therefore cost of membership and perceived value for money could be issue.

Some suggestions to overcome these barriers included:

- Membership is optional and cheap. Realign government funding.
- Representation from all types of RTOs.
- Providing a CPD system.
- Setting a framework for an association needs – a working party of researchers, competitors and industry associations to develop. Then funding should begin, although the association should be self-funded within five years.
- If an association was to be established, consideration should be given to the value of it being independent (own voice and not that of govt/RTO employer).

COMMENT:

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

In their divergent views, respondents offered that the purpose of a national professional association could be to:

- Maintain a professional standard, through the provision of training in current knowledge and interpretation of changes and to ensure quality professional services in the VET industry, including benchmarks for trainers and assessors.
- Provide for members and their differing level of need. Those employed within an RTO (TAFE e.g.) may have a different need to those operating within an ERTTO, for instance.
- Create the platform for a standardised approach to determining competence of training personnel.
- Create a consistent, agreed and managed PD scheme to reduce the requirement for constant qualification upgrades.
- Promote currency of information across training personnel, clear for trainees and RTOs to establish current members and a commitment from those practicing to meet ongoing requirements.

GENERAL COMMENT

There are certainly benefits to having a professional association – consistency of professional development requirements, agreed code of practice, and a professional skills framework based on collective data and research from the industry as a whole. The contentious issues are consistency in implementing this between the states and territories and monetary considerations. ERTTOs also have a number of volunteers and not-for-profit strategic partners where being a trainer or an assessor is not their major job role.

If this was implemented, there would need to be provision for a sliding scale for membership costs. Consideration would then be whether it is an individual cost, or would the enterprise absorb the costs – if it was set at \$10 per person x 1500 trainers and assessors, that would be \$15,000.

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:

- **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?**

While support for a national professional association was mixed, AFAC members who responded positively to the suggestion, supported all of the above mentioned activities.

Where developing capability frameworks is suggested, the existing VET Practitioner Capability Framework was put forward as a good foundation for review and possible expansion.

Before any work could proceed in this area, it would be prudent to undertake an audit of existing organisations to be clear about the services they offer and how they are viewed by industry.

The activities a professional association could undertake as per the aforementioned list would be considered suitable.

COMMENT:

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?

While respondents who supported establishing an association noted that having one industry standard to ensure consistency and professionalism would be beneficial, they also identified the challenge of trying to deliver these activities nationally:

- The variety of groups is broad, as are their offerings. All PD should be considered for CPD points, regardless of who offers it. One association cannot offer everything, but be the body who recognises others' offering by awarding CPD points, and who develop the capability framework for trainers and assessors at different levels.

- I believe there are a number of levels for trainers and assessors and these should be recognised in the framework, as in the Educational Services (Post-Secondary Education) Award 2010.
- There should be an umbrella national organisation that has determined requirements of what constitutes PD. This should be flexible and clear enough for members to cite membership and activities within existing groups as evidence. Any national organisation can still be broken into state divisions that provide PD in that state.
- A national approach would ensure consistency, and implementing changes through research or trends could be enacted/disseminated on a much larger scale rather than having individual states/ territories apply their own interpretations/standards.

COMMENT:

Are there any existing organisations that could fulfil this role?

One respondent noted that:

- Yes there are organisations that can fulfil the role of PD provision however these are fee-for-service, private providers. A national professional association should be created from scratch with clear objectives that do not involve \$ as a focus.

And another respondent indicated that:

- For our purposes, the ERTO Association could fulfil this role as they have an intimate knowledge of the complexities and struggles of applying regulations across the ERTO group.

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?

There was limited feedback to this question, indicating that further consultation is required:

- B is the preferred model. 'A' requires too much governance and layers of organisations that then waters down the intent of a professional association. 'C' does not suit the VET sector and the role of these organisations is not the core business or function of these bodies, although there are some benefits given that they have experience in the area.
- We do not support the introduction of a VET professional association but if one such organisation was introduced our preferred model would be Model B.
- Model A is the only model that can provide all that is needed to the VET industry.

And one respondent saw merit in all three models:

- Model C would be the easiest to implement as they already have an established system.
- The linkages with the accrediting body in Model A are favourable.
- Model B would also work but the preference would be to split them into the relevant RTO groupings. Having a specific professional association for ERTOS would be more valuable for our needs.

COMMENT:

What value would a VET professional association, or associations, add to the VET sector?

While respondents did not provide clear, overwhelming support for such as organisation, suggestions about the potential value to the VET sector included:

- Potentially it would enable more professional practice by VET practitioners. But should only be applied at the VET design level rather than the trainer/assessor level. If the design, funding model and governance are robust, then trainers will be more professional.
- The value would be in a consistent body managing the quality of VET professionals. It would enhance the perception of VET practitioners as professionals. It needs to be noted though that the association alone will not achieve the intended outcomes.
- The value of a VET professional association would be seen in the outcomes for students facilitated by those meeting the capability framework benchmarks.
- The association would provide a one stop shop for assistance or guidance for all trainers and assessors. It would also benefit auditors to clarify any grey areas in auditing (industry-based grey areas).
- An association could support VET personnel to maintain their skills and currency rather than the constant re-qualifying when new versions of TAE are released. This is the only profession that requires the trainer to redo their training qualification rather than prove ongoing competence and PD through a structured association. In the UK, training personnel form part of the Institute for Learning, you then gain full membership association membership etc. depending on the qualification held. Maintenance of membership involves proof of X hrs. per year of teaching and assessment etc.

- Would the association be for individual trainers and assessors or would it be for RTOs? Again many trainers and assessors are individual consultants and provide training and assessment on behalf of multi RTOs. Those trainers and assessors who do not operate as a consultant are often employed on a casual basis (as is where is). This is a mobile workforce and as such any mechanism of support would need to be adaptive to need.

COMMENT:

What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs?

Comments from respondents indicate that it is perhaps too early for such a specific question – that more detail is required or that this is a question that would have more relevance later in the discussion, should such an association be pursued:

- Who's the member?
- Funded model only. There are now too many associations demanding fees. Fees would be a disincentive as most payers are part time.
- Membership fees from the professionals that subscribe to it. RTOs may decide ultimately to pay this on behalf of their trainer assessors.
- The association should be funded by the Government. Fees levied against individuals or RTOs would be financially burdensome and may have a negative impact on the VET sector as both ERTOs and individuals may choose to opt out, thus reducing and directly impacting on our skilled workforce.
- Could be either with larger RTOs complying with requirements for all those registered within.
- The mechanism to sustain a professional association needs to be scoped further.

COMMENT:

Should VET teacher and trainer membership with a professional association be mandatory or voluntary?

While there are differing views on the value of establishing an association, there are also divergent views on whether the membership should be voluntary or mandatory. Two arguments put forward for it being mandatory are:

- If the association has a registration role, then the benefits would not be realised through a voluntary system. Other industries that require professionals to be registered practitioners are not voluntary.
- All teachers must belong to the association, as well as belonging to their industry association (if there is one).

One respondent also noted that VET teacher and trainer membership should be mandatory and based on an agreed funding model that is suited to large, small, public, enterprise and not-for-profit RTOs.

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?

There was little response to this question but if adopted, respondents highlighted the pitfalls of broad interpretation and reinforced the need for any capability framework to work within an ERTO context:

- The association would need a framework and it would provide a good starting point. Tools that support consistent measurement against the frameworks might be beneficial. Anything that leaves it up to interpretation by different organisations makes it hard to measure.
- The framework clearly identifies the VET sector as an 'Industry', however and importantly it can also be applied within organisations whose core business is not VET, to assist in the clarification and identification of roles and responsibilities e.g. ERTO.

COMMENT:

Is there an opportunity to make better use of these frameworks, irrespective of proposals to develop a professional association?

Respondents were very positive about the existing capability framework developed by IBSA:

- The capability frameworks developed should be utilised to define training and assessing capabilities, in literacy, numeracy and vocational skills. The IBSA developed framework goes a long way towards doing this. Each industry could work to define what they need in trainers and assessors, using the frameworks – with help from the VET association elected expertise.
- The VET Trainer Assessor Capability framework is an excellent foundation and should be implemented more broadly.
- There is an opportunity for this framework to be the underpinning identifier of skills and knowledge of workforce within the VET sector across operational requirements. It could also be utilised to support relevant Position Descriptions/associated training and qualifications.

GENERAL COMMENT

Respondents indicated support for the concept of capability frameworks for the VET system:

- The VET Practitioners Capability Framework (IBSA) is reflective of tasks, skills and knowledge for trainers and assessors from many industries who work in our VET industry. It provides a snapshot of various levels which can assist practitioners to identify future goals for development.
- Frameworks should be supported but independent of professional associations.
- Yes. Capability frameworks like the IBSA VET framework could be well utilised in the development of requirements within the professional organisation.
- More expansion and development of this tool in association with TAE10. For example the Third Level practitioner (Industry and Community Collaboration) could benefit from including Evaluation component.
- The capability frameworks should be used as a guideline and inform future changes to the units and packaging structure of the TAE qualification. The VET practitioner capability framework provides useful information, but is not used extensively within our ERTO.

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?

Respondents raised the following points about 'how industry can increase engagement with the conduct of assessment':

- Co-assessment with professionals from the relevant vocational industry who are independent of the training. They need to determine if the individuals are job ready. Challenges for our organisation in this regard are the fact that we are the enterprise RTO, so we are determining if trainees are job ready for ourselves against our own benchmarks.
- Industry issues will not necessarily be fixed by more engagement as industry is not 'training experts'. Industry engagement in setting NUCs is valid but the standards for quality training and assessment are already there.
- The complexity of the environment for training delivery, assessment and validation, such as:
 - Pre-employment
 - Apprenticeship/Traineeship
 - Institutionalised (on-line and/or learner driven).
- VET assessment is based on 'assessment of the practical application of skills and knowledge with the vocation', if an individual does not have the opportunity to evidence the practical application then maybe there needs to be an additional overarching component of the qualification being issued. For example, if a Cert IV in Business is being delivered and assessed in an institutional environment only, then this should be identifiable.
- An apprenticeship/traineeship requires employment based.
- Competency means the consistent application of knowledge and skill to the standard of performance required in the workplace. It embodies the ability to transfer and apply skills and knowledge to new situations and environments.

COMMENT:

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?**

It is acknowledged that some industries mandate assessment tools for use in a Training Package environment where a licensed outcome is required and that some industries have their own certification system that includes Training Package products – but this does not apply to all industries. It is also acknowledged that over time, content in these industry standards and in the units of competency have to reflect each other. But it is also acknowledged that these things have come to be, as a result of industry need.

Respondents focussed on the inconsistency of ‘the premise of a competency based VET system’:

- Pass/fail is not favourable in CBT; a development plan would have to be put in place. Competency based training is about the outcome. Pass/fail and pass rates go against how we apply and assess learning.
- An externally administered test would ensure that poor quality training providers are more quickly identified (prior to issuance of certification - having less impact on students having certification withdrawn as discussed later in the paper). It would also prevent common assessment judgement errors such as the ‘halo or horns effect’.

In contrast, another respondent argued that the concept of an externally administered test, such as a test required before receiving a qualification, is inconsistent with the premise of a competency based VET system. The key method industry can engage in assessment is to offer more real workplace opportunities for people to work/learn on the job. There is too much of a reliance on developing assessment activities that simulate or break down the real job so that they can be ‘assessed’. There needs to be more emphasis on real workplace learning where assessment occurs repeatedly over a period of time until the person can competently undertake the task or role. The VET sector spends too much time and money taking people out of the work environment to facilitate learning when they are missing the real opportunities provided through actual work and workplace mentoring.

GENERAL COMMENT

Industries have different ways of ensuring confidence in assessment. For our industry and our ERTOS, it is about collaboration (generally via AFAC) when developing resources and tools that all can use.

So while not specific to the ERTOS environment, respondents provided the following comments:

- Challenges with any approach that involves industry input are the costs and time required. It would need to consider issues such as: the incentive for industry organisations, how their costs would be covered, and possible conflicts of interest introduced.

Definitely moving towards creating the assessment tools and having them approved once by industry professionals will increase consistency and reduce need for ongoing repeated consultation from multiple RTOs. However, there is the challenge of determining whether or not they are being implemented consistently and correctly which is addressed through moderation.

There is a lot of duplicated effort across the industry in developing assessment tools and learning resources for the same purpose. As an ERTOS we are not in the industry competitively and therefore we are more interested in collaboration and sharing resources.

- Not applicable for our organisation. As an ERTOS we engage within and across industry and through AFAC, and administer our own ‘tests’ to ensure quality.

- A project to develop assessments could be funded across a number of industries as a pilot – to be rolled out when success is achieved. Assessment systems/tasks/tools could be developed by the vocational industry (possible through the vocational industry association with education and training expertise) in conjunction with the VET association elected expertise. Each RTO would then be required to contextualise these to their cohort and location – but they remain the basis on which a person is found competent. This would provide a more rigorous benchmark for assessment.

Industry should be in partnership with RTOs in assessment – creating a network of moderated ‘testing centres’ where every graduate from Cert III* and up are tested and granted the right to work unsupervised in the industry for which they have trained. (* Cert II graduates usually work in roles that are supervised – mitigating the risk associated.)

The testing centres could be the local TAFE, as it is more likely to have the space and goodwill required. A new government department should not be required to administer this system as it could become a funded section within the VET Association or requirement of each RTO to provide the facility and equipment for the qualifications they provide. The administration could then be an upload to the USI of each person tested.

Assessment should never be the end – assessment is yet another learning tool and should help to identify the training required (not a pass/fail). Once all the required training is assessed as having met the objectives, then the person is competent.

- A three- to five-year renewal test could also be administered, again through RTOs at a small fee to cover costs only. This is particularly important in practical areas, such as trades. Alternatively, other more theory based training could be assessed by ‘secret shopper’, theory tests or other problem solving activities.

External validation processes are an excellent method of increasing engagement within the conduct of assessment. Assessment of practice by like agencies are very beneficial to us in gaining independent feedback and how assessment could work better for both the trainer and the learner from those delivering units from the same Public Safety Training Package.

VET is centred on work based learning and assessment as such, the use of testing would need to be clarified before it could be commented on as to whether this would be an appropriate action.

Competency means the **consistent application** of knowledge and skill to the standard of performance required in **the workplace**. It embodies the ability to transfer and apply skills and knowledge to new situations and environments.

It is clearly stated and marketed throughout the VET system that it is industry driven; this includes Training package development, (including assessment) in accordance with industry standards.

There is a difference between a learner undertaking Cert IV Aged Care, delivered in an institutional environment with limited practical application on a continuous basis, compared to a learner undertaking the same qualification within the industry with the ability for consistent application of knowledge and skill.

- We are not supportive of introducing a NAPLAN-esque assessment system.

We have a vested interest in maintaining a high standard of competency for workforce capability and community response. This is executed through a range of processes using training and assessment tools, organisational policies and procedures, and other mechanisms. In addition, our organisation operates under a highly complex, dynamic and heavily regulated industry.

As the ‘industry’ – the main provider of emergency services across our state – we would be required to seek externally administered test support from other states and territories. This practice would be unsustainable.

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?

As ERTOS, AFAC members recognise the major role that industry plays in all aspects of training and assessment but also acknowledge the need to minimise any additional call on industry's time; respondents indicated:

- Employers are the vital end user of the VET graduates and therefore their validation of the output is critical. However, capturing this is challenging as employers are often time poor and do not necessarily understand the VET industry and its complexity. Employers often become members of industry organisations/associations so that they speak to one in order to speak to many. Employer organisations are often the necessary and critical communicator in terms of translating VET to industry and Industry to VET.
- Industry involved in validation should include other RTO staff (from a non-competitor, could be from another state) and industry practitioners.
- There is a lot of burden on industry and no clear mechanisms for how to make this happen. They are not usually training professionals so their involvement should not be required outside of their skill set. Industry already is involved in determining the benchmarks by involvement at the training package development level. Having every RTO engage industry for every product through the whole lifecycle creates a lot of impost on industry professionals and may be challenging for RTOs. There definitely is a need for relationships with industry, so having an industry body for each sector might alleviate a lot of duplication.

COMMENT:

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?

AFAC members, as ERTOS and as agencies with direct involvement with their peak body, are in a different position to other industry groups and employers, and as such respondents have offered the following comments:

- In terms of validating assessment it must be clarified whether it is the validation in respect of the tools and process utilised by an RTO or the validation of the issuance of competence as a result of the assessment?
- Not always. Many don't understand it and it can be burdensome. Many employers will not want to do it if there is no direct incentive for them and it is done at their own cost.

- Assessment is done by employers when determining if their personnel are job ready and able to perform tasks effectively and safely. It has already been identified in this paper that conducting assessment is done poorly, and this is with trainers/assessors who are qualified to do the function so it probably should be considered a specialised skill that should not be performed (but may be assisted by) industry and employers.

COMMENT:

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

Respondents have suggested that:

- Industry bodies should perform this role (as above).
- Industry does not necessarily have the capacity, but it is up to each RTO to help develop that capacity as part of their industry engagement. Industry is keen to be involved as they see the results of what they often regard as poor decisions in assessment. Industry Associations may have the capacity, although there are so many varied types of industry associations, this needs to be defined to only include those that includes an education and training 'expert' and portfolio within their constitution/board structure. I believe that government does not need to develop this capacity.
- Yes, it may be possible to support the establishment of assessment specialists within an Industry Organisation, who then may also be able to feed back into IRCs.

COMMENT:

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?

Respondents have suggested that:

- This is allocated to relevant industry associations/industry organisations who work in association with their members to provide input to the aforementioned assessment specialist housed within the industry organisation/association.
- Use industry bodies to do the consultation and share the outcomes with all RTOs. All RTOs require the same kind of input from industry, so having this managed through a central body would alleviate the impact on those with the expertise. A UOC is pretty prescriptive about what someone has to do to be competent. Change the way the UOC is written to provide the tools for RTOs to use a standard assessment form – how they get the learner to the point of competence is up to the RTO, but assessment should be as specific as the UOC is.

GENERAL COMMENT

In our industry, industry engagement is via the peak body (AFAC) and its sub committees (for this response, the AFAC Learning and Development Group, of which all AFAC member agencies are a part). It is within this context that the following responses were made:

- There is value in using external agencies for assessment validation. We are industry and we have a lot of opportunities for consultation.

Instructional designers who have worked outside our industry have indicated that many industry employers or industry groups do not see the benefit in being involved in assessment validation and practices. Often they are also limited in their understanding of competencies, training packages and assessment methodologies. Many employers indicate it does not add value and often find it too costly to participate. Many RTOs endeavour to engage industry but find themselves low priority in the employer's priorities. Many employers also question the competency and assessment requirements as not meeting workplace requirements.

- Industry should be the validators of assessment as they are the ones employing and supervising workers who are meant to already be competent. They are the best placed to validate competence and assessment. This way 'industry' is defined as those that employ or engage skilled workers.
- Clarity in relation to the context of assessment validation would be useful here:

- validating of the assessment process
- validating the assessment of the evidence.
- As an ERTO, this process is embedded within our organisational workforce capability framework and training and assessment strategies. It does not apply in our situation as we are essentially the 'industry'. However, we have established professional industry associations and memberships with other emergency services departments across Australia and would be supportive of further engagement in the design process with 'industry' but would like to see flexibility be applied for smaller RTOs who may find it difficult to engage with relevant organisations.

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 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.**

Respondents support strengthening existing structures when it comes to validating assessment:

- This independent validation process may seem reasonable in accordance with Commercial RTO/TAFE whose core business is to train, however as an ERTO it is not in our interest to provide competence unless the employee has reach the standards required. Due consideration should be provided to the whole VET sector such as ERTOS.
- It appears that independent validation is being implemented to attempt to take this onus away from the registering bodies. Best practice feedback and high-risk reviews are part of the audit process. Additional requirements such as independent validation involve more parties who may not be any more qualified to perform the validation appropriately.
- A validation guide with templates needs developing (there used to be one in the 1990s) which is clear on intent and how to use – this must be completed on a sample – say 30% of each qualification.

COMMENT:

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?

Again, respondents support strengthening existing structures when it comes to industry's role in assessment:

- This approach doesn't seem suitable for ERTOs. We are already making the judgement about students' employability and would not sign off a student who could put themselves and others at risk. As competency is determined at a point in time, it in no way negates a future hazard of someone performing the role incorrectly. Employers have a responsibility to monitor their employees and ensure that they are able to safely perform their role under WHS – VET shouldn't be playing a policing role. Perhaps the issue of public safety needs to be considered a licensing issue.
- It is noted that certain industries were identified in the *Quality of Assessment in Vocational Education and Training – Discussion Paper*. Other circumstances that may contribute to increased external assessment (as a risk control measure) could include:
 - legislative changes/demands within certain industries (e.g. Early Childhood Cert IV)
 - skills shortages (e.g. Aged Care)
 - incentives (labour market initiatives).
- There may also be the possibility for VOC process to be implemented in the case of public safety; however one has to ask the question as to how can competence be issued if it is in accordance with the training package requirements? Accountability surely must sit with issuing RTO.

COMMENT:

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?

One respondent offered the following comments:

- Whilst it could be considered that there are multiple risk factors, ultimately there is only area of accountability for assessment and issuance of certification and that risk is the RTO.

COMMENT:

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.**

Again, respondents support better utilisation of existing structures, processes and systems, and offered the following comments:

- Firstly, the examples listed aren't student cohorts. The examples relate to RTO profiles, public safety concerns and delivery methods. Secondly, RTOs with identified high levels of non-compliance should not be operating. The burden of dodgy RTOs should not be placed onto other RTOs – the regulators need to be better resourced and perform their function. Regulators should monitor RTOs in accordance with their risk profiles. There are already provisions for managing these issues in place in the legislation.
- If an RTO is not competent to deliver certain qualifications then they shouldn't be licenced to deliver them. An RTO's risk level of non-compliance should be made publicly available in order for the student and or employer to make an informed decision in respect of who will deliver their training. This should be a public awareness process (must be stated on website/marketing materials etc.).
- **Evidence of Competency** is the **consistent application** of knowledge and skill to the standard of performance required in **the workplace**. It embodies the ability to transfer and apply skills and knowledge to new situations and environments.

COMMENT:

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?

Respondents are mixed in their opinion and offered the following comments:

- Re-assessments, if deemed necessary, should be on the entire co-hort, but at a holistic level.
- The proposal of independent reassessment is unfair on students. If someone wants to monitor quality from an external viewpoint, come and see it when they are being assessed. Alternatively better approaches to moderation could be in place – two assessors both assess the same student to ensure that the decisions are fair and consistent.
- Circumstances could identify the necessity to undertake independent reassessment (as a risk management procedure) could be those industry sectors which have, for example:
 - legislative changes/demands within certain industries (requirement for a minimum Cert IV)
 - skills shortages (e.g. Aged Care)
 - incentives (labour market initiatives).

COMMENT:

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?**

Again, respondents support utilising existing VET regulatory structures and offered the following comments:

- Regulators should regulate; this is their role.
- Re-assessments should be done by expert assessors including industry members.
- There are no experts in assessment across all industries.
- Reassessment and associated costs should be the responsibility of the RTO who originally issued the qualification. What would be the ramifications for the RTO in the circumstance and where is the accountability?

GENERAL COMMENT

As ERTOS, respondents operate under an enterprise training model, to which these questions have little direct relevance; comment is provided on this basis:

- Validation is a requirement of the standards and each RTO should develop their schedule according to their own scope and risk. So this individualising that already exists in the standards specifies the parameters of assessment validation (including independent), which may overcome the 'one-size' attitude.
- We do not support the option to reassess all learners. This would be cost prohibitive and difficult for the nature of our workforce.
- Currently assessment validation takes into account 'independent validation' of assessment outcomes (as required by standards). A sample should reflect all levels of validation and therefore provide feedback to the RTO on performance. Current funding models already require independent assessment validation.
- The notion of 'licencing' or capstone tests as applies in the Electrical trades industry in NSW, is an excellent idea, but only if they are renewed every 3-5 years. Some qualifications may not require the same rigorous testing, but potentially an 'ethics' or problem solving test may be more appropriate. Some training is so non-specific that it would be difficult to assess as the training may have led to employment, but not clearly related to what they are doing 3 years later. Industry associations should determine what they want assessed and re-assessed.

- There are a lot of RTOs that do not operate on the basis of receiving Government funding so this should not be used as a means to regulate validation. Validation should be an assessment of the quality of the competency outcome best evaluated through workplace performance monitoring. Any independent assessment process should be based on a risk assessment of the assessment process and a sample of the cohort.

One respondent noted that:

- we use combination of the *ASQA User Guide for RTOs* and the *User Guide – Delivering training and assessment services in a business enterprise environment* published October 2015 by the ERTO Association, as reference points and guidelines for maintaining adequate arrangements for validation
- we would not support an increased role for external assessments – this should be outlined already via the RTO training and assessment strategy for the unit/qualification
- as part of a network with other emergency service departments across Australia, we are heavily involved in the design of the Public Safety Training Package, review and development of learner resource materials and discussions for embedding current research into units of competency and curriculum within our own department
- we would not support independent reassessments before students can be issued their qualifications.

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?

- **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?**

Respondents support strengthening existing structures and better communication of these to all concerned.

- The AQF already outlines the expectations at each qualification level, however this does need to be better communicated and all VET information needs to be written in plain English so that non VET practitioners can understand it (e.g. Training Packages, Standards, etc.). For example, outside of the VET industry, the terms ‘competent’ and ‘not yet competent’ may not be easily understood.
- This question suggests that the current practice of embedding employability skills does not work. This should be assessed clearly if they are expected as part of the qualification. VET is about being job ready.
- SSOs in conjunction with specific industry associations and networks should develop the resources to better inform industry. The terminology needs to be further explained and contextualised to each industry to ensure the industry expectations are commensurate with the AQF and qualification intention.

GENERAL COMMENT

Respondents suggest that:

- There does appear to be a lack of alignment between what industry expects the graduate to be able to do upon completion of VET qualification (does vary from industry to industry). In many cases the graduate develops technical skills and knowledge but may not really hold all employability skills required for them to be able to fully complete the role in a specific context. Job roles do not always match competencies exactly, which adds another complex layer. A competency may not fully prepare an employee for the specific nature of the job role.
- The core skills for employment framework do address this issue and most VET practitioners are conversant with the framework and are able to embed this into their training and assessment. The terminology is difficult for some to grasp – old generic terms were much more appropriate for the general workplace. AQF levels may need to be reviewed.
- Yes industry and government have a role to place in guiding consistency across an industry and to formulate and monitor standards.
- Placing higher emphasis on the resources available could increase awareness in this space – such as the AQF, and unit of competency and qualification descriptors.

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?

AFAC member agencies recognise that the *Standards for RTOs* came into effect in 2015 and that consequently, these Standards need a period of implementation before any revision is undertaken (unless the Standards are so deficient that they jeopardise safety or present an unmanageable risk).

AFAC member agencies also acknowledge that the implementation of the Assessment Requirements in the Standards for Training Packages could alleviate concerns about the evidence to support assessment.

Given this, respondents have suggested that:

- Assessment tools should be standardised in the TP first and if there is a minimum requirement of evidence or documentation then this should be made clear. All RTOs should be held accountable to the same standard.
- The audit authority should have the ability to assess the outcomes for graduates – were they employable, did they get a job (only if they applied for some), did they keep their job (why, why not?). Direct student feedback to audit authority – what do they think of their college. This way it avoids being a complaints-driven system. Many people will not make a complaint once they have completed, but if the feedback loop was compulsory (with an opt-out option after logging on) prior to the issuance of a qualification, auditors would hear a lot more!
- Suggestion: an online feedback loop (tied to their USI) with questions measuring their opinion of the quality of training, facilities and equipment, assessment, trainers, job-readiness, success in gaining employment; an opt-out could be the first option. Include a comments section as well.

COMMENT:

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?

One respondent commented that:

- Depends on what they are going to do with the samples. Maintaining assessments for a longer period will achieve nothing. Providers are likely to keep only good samples. If a student is going to complain, it will be soon after graduation, or not at all.

COMMENT:

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?**

Respondents support looking into the functions provided and not provided by VET regulators to address this issue:

- The regulator should be capturing in audits, that the assessment is correct. The regulator is the body in place with the training and assessment expertise and should be able to audit and identify these issues with assessment. It has been identified in this paper that assessment is poor, so professionals with excellent understanding of assessment and good assessment practice should be involved in the regulation. Samples of assessments should not be burdensome for an RTO to provide or for the regulator to review. The main issue is that most 'evidence' is a paper based compliance item when we are assessing people's knowledge AND skills. Assessment checklists are not great to confirm what actually practically happens and this is hard to verify. Technology options for capturing evidence of student performance are increasing and improving all the time, these could be further explored by RTOs.
- Assessment outputs should be monitored by ASQA, through an industry association and network feedback loop. This could be a simple 3 or 4 question online survey with the option for additional comments.

COMMENT:

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?

One respondent suggested that:

- This suggests that training and assessment do not go hand in hand. RTOs should be training to meet outcomes of competency – this is what assessment measures. Any suggested solutions must benefit students. In this proposal it appears that they will do training with one RTO but then have to go elsewhere to be assessed. Training-only RTOs exist now and are generally known as non-accredited training providers. An RTO should provide an end to end service and employ the personnel they need to deliver this.

GENERAL COMMENT

Given the context of VET regulators, respondents suggested that:

- The RTO standards around assessment are quite rigorous, but this depends on the 'quality processes' applied to each RTO and some may still slip through.
- If RTOs are validating evidence from their assessments according to the ASQA suggested formula there should be a sufficient number of assessments captured through this process. Additionally the validation process should not only show the outcomes but also the follow up (including completion and adjustments) of the validation. Effective records management systems (including technology) should easily manage the documentation.
- In many cases the assessments conducted are effective, reflective of current skills and knowledge and contexts but then the graduate may not actually use these skills for a period of time, or the work role may not actually reflect the competencies. Many employers indicate that the units of competency do not reflect real work environments (and even ask who was even consulted to create content in the units), this therefore has an impact on the perception of industry/workplace and graduate competency level. There are many external factors that may impact on an individual current competency.
- It is appropriate for ASQA to regulate this function.
- The quality of assessment can be improved by removing the assessment options that allow competence to be determined by non-competency based methods. It should not be acceptable to assess someone for example in changing a car tyre by having them provide journals, third party reports, written or oral questions or interviews without actually demonstrating through direct observation by the assessor.

- The *Standards for RTOs* and training package rules define the assessment process. There should not be extra rules placed on all RTOs based on the ones that are not performing to these standards. Those questionable RTOs would still be performing non-compliance activities whether or not there is an increase in the regulation of assessments. Resources could be spent providing further education, audit support and actual penalties for those non-compliant RTOs.

The definition of firms that specialise in assessing students – would they be considered an RTO? The industry is already in a situation where RTOs are reliant on consultants and firms that are providing advice (good/bad) to maintain compliance. Who would be the additional firms that specialise in assessing students?

Training-only RTOs should not be recognised as a formal part of the regulatory framework.

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?

Given the context of VET regulators, one respondent offered the following comment:

- Actually observe assessments taking place at the time the RTO conducts them instead of implementing an external reassessment process.

COMMENT:

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?

Respondents offered the following comments:

- Prevent it happening by providing the right tools. Implement the registration of TAs so the students don't have poor assessment and don't have to be reassessed to prove their competency again.
- Reassessment is not a feasible option as it would be difficult to prove that a student wasn't competent when they were assessed the first time, so it would be unfair to penalise an RTO based on this measure.

COMMENT:

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?

One respondent offered the following comment:

- If penalty provisions are in place they should apply equally.

COMMENT:

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?

One respondent offered the following comment:

- Don't allow them to deliver and assess. Remove registration of poor TAs if a professional body managing registrations is put in place. If penalties only result in 'rectification processes' ensure they are monitored afterwards. There are already enforcement mechanisms and penalty provisions in the legislation, they should be used more to stamp out the dodgy providers.

COMMENT:

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?

One respondent offered the following comment:

- It would be interesting to compare findings from one auditor to the next as there have been many complaints of inconsistent findings. This could be difficult to manage due to the competitive nature of most RTOs and being able to share information without releasing intellectual property. Generally, advice on areas of non-compliance and ways to improve practice from lessons learnt is positive. Regulators are also constantly exposed to examples of good practice and therefore sharing of such case studies would be beneficial too.

GENERAL COMMENT

As ERTOS, respondents offered the following comments:

- Evaluation of assessment processes are critical for continuous improvement and quality systems for RTOs, and are required under the standards. For an ERTTO, it is often possible to collect follow-up evaluation data as we have access to workplace managers and supervisors who may provide feedback on application in job role and can be involved in consultation (pre and post).
- Additionally only measuring quantitative data such as successful outcomes against achieve or not achieve is limited. Many learners have additional barriers such as cultural, disability, LLN, regional access etc.) and only reporting on qualification outcomes does not capture this important data. Successful outcomes should not always be only measured in did they receive their qualification? Extending evaluation of outcomes could be extended to include other factors such as work experience, socialisation and developing learning skills as these are all positive outcomes too, but are often overlooked or not recognised in evaluation to measure success.
- There also needs to be trust in the qualified trainers and assessors otherwise why do we even require them to hold qualifications and we undermine the AQF and VET Quality Framework?
- Rather than more regulatory requirements, provide additional resources and support such as Assessor Networks (supported) would be more beneficial to the actual VET practitioners, developing their skills and confidence in the systems we already have in place.
- Comments for the above question also relate to these discussion points:
 - The audit authority should have the ability to assess the outcomes for graduates – were they employable, did they get a job (only if they applied for some), did they keep their job (why, why not?). Direct student feedback to audit authority – what they think of their college. This way it avoids being a complaints-driven system. Many people will not make a complaint once they have completed, but if the feedback loop was compulsory (with an opt-out option) prior to the issuance of a qualification, auditors would hear a lot more!
 - Suggestion: an online feedback loop (tied to their USI) with questions measuring their opinion of the quality of training, facilities and equipment, assessment, trainers, job-readiness, success in gaining employment; an opt-out could be the first option. Include a comments section as well.
 - Assessment outputs should be monitored by ASQA, through an industry association and network feedback loop. This could be a simple 3 or 4 question online survey with the option for additional comments.
 - Inadequate assessment, when identified, should be corrected within a reasonable timeframe. No penalty ... until the 2nd time. Then on notice, followed by an audit of all assessments. If assessments are still inadequate then at the audit, training only, and they must arrange an external assessment, for the next 12 months. Then review.
 - All RTOs should be treated the same – regardless of size or number of students.
 - All RTOs with special conditions still to be published, after the RTO has been notified with a 7 day right of reply (no further changes/improvements can be accepted at this stage).
- Regulation could include actually attending assessments being conducted and evaluating the outcome against the competency. This should also be part of the initial registration requirement.
- Where an RTO is found by the regulator to have assessment practices that are not up to standard they should be immediately restricted from offering assessment until they can demonstrate standards are met. If an RTO takes on the responsibility to deliver and assess a qualification or unit then they need the capability to do it properly which should be demonstrated at initial audit.
- RTOs have relied on the weakness of the regulator to cut corners and avoid maintaining real quality. The standards would immediately and significantly increase if there was immediate action for non-compliance rather than having time to figure out ways to navigate around the requirements with minimal cost to operations.

- Most industries promote good practice examples but should also report on (in a generic way) noncompliance.
- This could be improved by having a consistent approach to the auditing process. In addition, the emphasis should be placed on understanding the different types of RTOs that operate and that quality educational outcomes can be derived using different methods and system processes.

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?

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?

As ERTOS, respondents offered the following comments:

- It is really unfair on students so needs to be managed carefully. It should be prevented before it occurs, but if it does then yes – cancel them as there is no value in a qualification you don't actually have the skills to do.
- Cancelling qualifications hurts the graduate, not the RTO. The RTO should pay for re-assessment and any remedial training required and re-assessment again. This needs to be handled carefully as it could be open to abuse. The external assessor cannot recommend an RTO for remedial training.

COMMENT:

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?**

As ERTOS, respondents offered the following comments:

Reassessment would be in preference to withdrawing a qualification:

- In the case of student fraud, no reassessment should be offered. In circumstances where the RTO is at fault, RPL/RCC opportunity should be available at no charge.
- Definitely time frames should be considered as students would already be using the skills. Employment shouldn't be a factor in the cancellation – if the qualification is not issued correctly it has no value. If the qualification rather than the skill is required, this enhances the need for the RTO to train and resource its assessors in the manner appropriate to the risk poor assessment represents.
- The RTO should pay regardless of financial viability – they are managing a business and need to comply. Not complying means rectification. Of course if student fraud was the reason then the student should pay.
- In a commercial RTO environment it should definitely be another RTO. It would be likely that the student would be disgruntled in this type of scenario and not have faith in the RTO. In the ERTOS context this would be a little different as we would have continued access to the student and it would be in the ERTOS's best interest to implement changes to ensure the best quality outcomes for its personnel.
- Clearly another RTO that meets the same TA requirements under the standards. Why would you have different rules here?

Reassessment:

- If a student is guilty of serious fraud they should not be given the opportunity for re-assessment
- Re-assessment should take place prior to cancellation of the qualification, although if safety is an issue, suspension is an option, until re-assessment can take place. If the financial situation is impossible, then the Tuition Assurance Scheme should fund it.
- The RTO at fault should bear the cost of re-assessment and gap training.
- Re-assessment should never be by the RTO at fault. An industry person with another compliant RTO should re-assess.
- Industry member should be present; the qualifications of the assessor should be as prescribed in the Training Package.

COMMENT:

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?

As ERTOS, respondents offered the following comments:

- This is not relevant for an Enterprise RTO.
- Tuition Assurance Scheme (TAS) should be extended to include the scenario of re-assessment and gap training to the value of the qualification. Membership of TAS or bank guarantee to the equal amount should be mandatory.

COMMENT:

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

As ERTOS, respondents offered the following comments:

- Employers need to have the say in the importance of the qualification for continuing employment. If the student is performing to the required standard in the workplace, then a decision that negates their qualification should not matter unless it is a licensing or industrial agreement requirement. The situation is very messy and should be prevented with better controls up front. Other education sectors see it as an advantageous to boast about the quality of their graduates and so mitigate the risk.
- If the student is eligible for Austudy or other benefits, they should receive it, regardless of whether the student has graduated and needs further training in the same qualification.

GENERAL COMMENT

As ERTOS, respondents offered the following comments:

- In only extreme cases where there are high risks to public safety should a qualification be cancelled. Maybe in these cases refresher training and assessments may be more appropriate but this would need to be examined closely as there are too many unknowns.
- As an ERTTO we benefit from having direct relationship with our workforce (industry) and stringent quality training and assessment polices and processes. Maybe need to consider ERTOS having different regulations.
- Again we are questioning our trainer and assessor skills and knowledge and instilling a lack of confidence in our industry. Rather than looking at a big stick approach we should look at some practice measures to support and further develop both RTOs and practitioners. There has been so much change in the past 3 years many have found it difficult to keep up.
- A tuition scheme would be just costly to all – even if it was levied onto the RTO many would pass the financial cost onto the learner therefore making VET qualification less affordable.
- Cancelling qualifications only disadvantages the learner rather than having any significant impact on the RTO. There needs to be processes strong enough to protect students from non-compliant assessment practices. The student loses out financially and professionally if made to repeat assessments due to the failings of the RTO. The focus needs to be on the sanctioning of the RTO and maybe forcing them to pay for the students to attend and complete studies at a compliant RTO.
- The cancellation of qualifications should be exercised within current regulatory arrangements.