Australian Government
Department of Education and Training

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

Key consultation areas

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

Chapter 1: Foundation reforms

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

Chapter 2: Reforms to the assessment of VET students

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

Chapter 3: Reforms to the regulatory framework

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

How to provide feedback

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

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

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

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

Submission details

1. Submission made on behalf of: ☐ Individual   ☒ Organisation

2. Full name:

Keiko Yasukawa (Vice-President)

3. Organisation (if applicable):

Australian Council for Adult Literacy

4. Please indicate your interest in this discussion paper:

Professional peak body

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

5. Do you want your submission to be published on the department's website or otherwise be made publicly available?   ☒ Yes   ☐ No

   a. If yes, do you want your name and organisation (if applicable) to be published alongside your submission, OR would you like for only your submission to be available and your details kept anonymous?   ☒ Published   ☐ Anonymous

   b. If no, please advise the department upon submission that you do not want your submission to be published or otherwise be made publicly available.

1. Discussion questions – RTO limitations:

- Is it appropriate for relatively large numbers of RTOsto deliverTAE 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:

A number of research studies have indicated the variability of the quality of delivery of the TAE qualification (e.g. Clayton 2009; Productivity Commission 2011), and the Certificate IV in TAE in particular has been identified as a high risk qualification. Other research (eg Halliday-Wyne & Misko 2013, Smith, Yasukawa & Hodge 2015, Wheelahan 2007) have challenged the adequacy of Cert IV in TAE as an entry level qualification for the VET sector. Given these concerns both about the quality of the delivery of the Cert IV TAE and the adequacy of the qualification itself, it is imperative that its delivery be limited to providers who can be formally and independently monitored to deliver a quality qualification.

We also recommend that there is an accreditation process before providers could be approved to place the TAE qualifications on their scope of registration. The accreditation could be undertaken by a panel including highly qualified and experienced VET teacher educators who have the knowledge and experience to assess the quality of delivery rather than duplicating the kind of auditing brief undertaken by ASQA. The focus of the accreditation process would similarly be the demonstrated qualificiations, experience and observed practices of the identified assessors as well as the ability of the provider to meet prescribed assessment guidelines. The accreditation of the assessors would be

restricted to those who have been approved and would not be transferable to other trainers or teachers employed by the provider.

We strongly believe that those delivering TAE qualifications should be experienced adult/ VET educators, and any who deliver the LLN units should hold a relevant specialist postgraduate qualification. Those delivering the Cert IV TAE should hold at least a Diploma in TAE, but preferably a higher education adult/ VET teacher education qualification, and those delivering higher level TAE qualifications should hold a degree level qualification.

We believe that TAE providers should be allowed to issue the TAE skillsets or the qualifations to their own trainers and assessors. This would present new pressures, particularly if the previous recommendation about limiting the number of providers is adopted.

So long as the TAE qualification remains the mandatory entry level qualification, we do not generally believe it is appropriate it be obtained by practitioners through RPL (based on experience only). However, there may be instances where practitioners have gained relevant higher level qualifications (eg Bachelor or Graduate Diploma qualifications in VET or Adult Education) that include training and assessment pedagogical theory that is applied through mandatory, supervised practicum components where an RPL process may be justified.

Any redesign of TAE should allow flexibility to ensure the qualification can be tailored to fit the context and purpose.   While the TAE is primarily designed for use in the VET sector, adult language literacy and numeracy teachers with degrees and post-graduate degrees are required to complete Cert IV in Training and Assessment to work in some positions (i.e. Federally funded Skills for Education and Employment SEE teachers).   While they do need to understand and assess training packages their skills are quite different to someone who is just beginning VET training in an industry setting. There needs to be recognition of differing requirements, contexts, and existing skills and qualifications. We believe it is essential that at least one supervised practicum component of a minimum duration of 60 hours of actual delivery and assessment teaching is essential to the TAE or any other entry-level VET teaching qualification. The trainee teachers' practices must be assessed by a qualified teacher educator: it is in the teaching practice where the trainee teachers' knowledge of the industry/ discipline, their skills as a communicator, and their pedagogical skills can be assessed. Written evidence is not sufficient.

References:

Clayton, B. (2010). *Practitioner expectations and experiences with the Certificate IV in Training and Assessment (TAA40104)*. Adelaide, SA: NCVER.

Halliday-Wynes, S. & Misko, J. (2013).*Assessment issues in VET: minimising the level of risk.* Adelaide, SA: NCVER.

Productivity Commission. 2011. *Vocational Education and Training Workforce*. Melbourne: Commonwealth of Australia.

Smith, E., Yasukawa, K. & Hodge, S. (2015). Australian VET teacher education: What is the benefit of pedagogical studies at University for VET teachers?*TVET@Asia.5*, 1 - 15

Wheelahan, L. (2007). How competency-based training locks the working class out of powerful knowledge: a modified Bernsteinian analysis. *British Journal of Sociology of Education*. *28*(5), 637-651.

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:

Assessment is a key component of teaching/ training practice. However, it is not separable from the teaching/ training components. The two components should mutually inform a teacher/ trainers' pedagogical practice. Consequently we believe that knowledge and skills of assessment should be a core component of an entry-level VET teaching qualification. This, however, points to the problem of maintaining the Cert IV as the entry level qualification for teaching in the VET sector. The need to expand the Cert IV is an indication that it is not the appropriate level for a qualifying VET teachers.

VET teachers/ trainers, like all teachers need to be confident to exercise professional judgment in every aspect of their practice, including assessment. This confidence is strongly linked to the depth and breadth of pedagogical theory (including assessment theory) and the level at which they have applied this pedagogical knowledge in their teaching practices. There has been research in VET teacher qualifications (see for example Smith, Hodge & Yasukawa 2015, Smith, Yasukawa & Hodge 2015, Wheelahan 2007 – references in the previous section) that suggest that VET teachers with higher education teaching qualifications feel more confident and better equipped to negotiate the challenges in their practice. Wheelahan (2007) explains this in terms of the access to higher level pedagogical knowledge given to practitioners in the university courses that enables them to think and imagine new possibilities and strategies beyond their everyday practices. In the increasingly complex and diverse VET environment, this capacity for innovation seems critical to foster.

In the field of Foundation Skills, providers are increasingly utilising commercial online assessment products, particularly for indicative only diagnostic/ pre-assessment of learners starting a vocational course. We understand that for some providers, this is a way of screening students attempting courses that are eligible for *VET fee-help* and to minimise the kinds of risks that have recently been exposed for both students and providers. However, assessment results must be interpreted by qualified teachers (in this instance qualified language, literacy and numeracy teachers) who can give professional advice to students who have performed poorly in one or more aspects of the assessed areas. These assessment/ teaching interfaces are critical for the design of achievable pathways and retention of students in the VET system, and require knowledge, skills and experience of both assessment and teaching/ training.

The three current core TAE Certificate IV assessment units of competency, namely TAEASS401AB Plan assessment activities and processes, TAEASS402B – Assess competence and TAEASS403B Particiapte in assessment validation appear to cover most of the key skills and knowledge that would be required of an entrant to the VET teaching sphere. However, as with other training packages, there is no reference to assessment theories and concepts that should underpin teachers' planning, implementation of assessment regimes and their validation. For this reason, we argue that it is imperative that the providers of such courses be accredited and thus have demonstrated a high level of expertise in integrating established theoretical knowledge with actual practices. This is obviously also necessary in the case of delivery of units of competency as well as their assessment.

We do not believe that it is necessary to substitute the TAEASS502B – Design and develop assessment tools unit of competency for the current three assessment units in the CertificateI V because we believe that if the latter are delivered well and applied in a supervised practicum situation then they would provide a good foundations for beginning VET teachers.

- 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:

We believe it would be difficult to to meet the professional development needs of the diverse range of Australian VET teachers and trainers within one professional development organisation. Because experts in a field have learnt to apply their knowledge and skills in multiple contexts over time, it would be difficult to encapsulate these in a generic way that was appropriate for all practitioners. For example, within the literacy literature (including that published within the context of higher education) , there has been a move away from generic literacy knowledge and skills) (e.g. Vacca and Vacca, 2002) beyond a very elementary level (e.g. foundation skills) to one that is more disciplinary. (See for example. Wineburg and Reisman 2015 who make a case for considering disciplinary literacy in history). Thus, even within the constrained field of literacy, it is recognised that substantial and substantive differences exist and relevant professional development should be particularlised. This would be impossible for a national VET professional association to accomplish. It may be beneficial, however, to support the formation of industry specific professional associations of VET teachers, for example, a professional association of teachers teaching in the engineering trades. This would be analogous to organisations such as the Primary English Teachers Association Australia and the Australian Association of Mathematics Teachers in the school sector. Such organisations could contribute to the enhancement of vocationally contextualised pedagogies and assessment in each of the industry areas. Such a need has been advocated in earlier research (Wheelahan 2012).

The Australian Council for Adult Literacy (ACAL) is an example of a national professional association for adult literacy and numeracy practitioners. Some ACAL members work in sectors outside the VET sector, but many of the members and participants in ACAL events work in the VET sector. ACAL hosts an annual conference that serves as a key professional development event for practitioners in the field of adult literacy and numeracy/ foundation skills and engages in other professional development activities (e.g. regular webinars on relevant and topical issues). The Australian Council of TESOL Associations also serve a similar purpose for those teaching English to speakers of other languages (TESOL), although ACTA is a much larger organisation that includes school teachers as well.

ACAL's work and standing have been supported by local state councils in NSW, Queensland, Victoria, South Australia, Western Australia and Tasmania, and the local councils ensure the reach of ACAL's work to the practitioners on the ground and reciprocally, informs ACAL of state/territoty issues and developments. However, both our national organisation and local councils operate largely on membership fees (some states receive some state funding), and volunteer commitees, with a small amount of paid assistance. Funding by the Australian Government to ACAL to undertake specific work would assist us to provide a broader range of professional development to the adult literacy and numeracy field, the VET workforce and contribute to other professional development

organsiations. What is needed more is a national strategy that includes not only professional development policies and strategies but reflects the varying contexts and needs of the practicitoners within this field. Further, the funding would need to be sustained and not an initial grant. This is likely to be the case for other specific disciplinary sectors within VET.

References:

Vacca, R. T., & Vacca, J. L. (2002). *Content area reading* (7th ed.). Boston, MA: Allyn & Bacon*.*

Wheelahan, L. (2012). *Why knowledge matters in curriculum: A social realist* argument. Routledge.

Wineberg, S. & Reisman, A, (2015). Disciplinary literacy in history: A toolkit for digital citizenship. *Journal of Adolescent and Adult Literacy*, 58*(8), 636-639.*

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:

A professional association dependent solely on membership fees could not be expected to undertake all of the activities listed above, especially the registration role. It would be completely unreasonable to expect a volunteer, membership based organisation to assume the responsibility of accrediting/ registering practitioners – in VET generally or in sub-areas such as Foundation Skills/ LLN.

An organisation that has successfully served a quality assurance and professional development role in the VET sector is NEAS. For the VET sector, they set up a national working group of providers delivering the Adult Migrant English Programme, undertakes the quality assurance of the AMEP provision and organises regular professional development workshops. However, they are funded to undertake these activities from the Commonwealth Government.

NEAS could be a model to look at for the kinds of activities envisaged above.

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

- Which of the suggested models for a VET professional association would be considered most preferrable and viable in the current VET environment? Model A,B or C?

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

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

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

COMMENT:

No comment provided

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<tr><td>6.</td><td>Discussion questions – capability frameworks:</td></tr>
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- What can be learnt or applied from the capability frameworks that have been developed or are currently being developed?

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

COMMENT:
No comment provided

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:

No comment provided

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:

No comment provided

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:

No comment provided

10. Discussion questions – industry expectations and graduate capabilities:
• Is there a role for Government or industry to develop resources outlining VET graduate expectations for particular training products? If so, who should take this work forward?   – Do higher order issues need to be resolved regarding terminology such as 'competent' (as assessed against the training product) and 'job ready' (ready to undertake all aspects of a particular job)? Is there a common understanding of VET system outcomes?

COMMENT:

No comment provided

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:
No comment provided

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:

No comment provided

13. Discussion questions – cancellation and reassessment:

- Where inadequate assessment has occurred, should the power to cancel qualifications be exercised more frequently than it has in the past? What factors should affect this decision (for example, potential impact on public safety) and how should they be balanced?

- Should a scheme for the reassessment of students be implemented? If so:

  - Are there any situations where a student should not be offered the chance to be reassessed, for example, student fraud?

  - Should there be a time period after which ASQA should not move to cancel an individual's qualification? Noting potential public and other safety issues, should a decision to cancel consider whether or not the person involved is reliant on the qualification for their current employment?

  - Who should bear the cost of reassessment and any gap training found to be necessary? If the cost is to be recovered from the RTO, should this be pursued regardless of the RTOs financial viability?

  - Who should deliver the reassessment? Are there any circumstances in which it would be appropriate for the original RTO to undertake the reassessment?

  - What should the qualifications be for those doing the reassessment, and what industry experience and currency would they need? To what extent should ASQA, industry or employers be directly involved in the reassessment process?

- Should a tuition assurance fund be set up to further protect students in Australia's VET sector, particularly in the context of any scheme of reassessment or cancellation of qualifications? Should membership be mandatory for all RTOs? Who should operate such a fund, and who should bear the cost of its operation?

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

COMMENT:

No comment provided