

ACER Submission to the *Quality of assessment in vocational education and training – Discussion Paper*

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
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Introduction

ACER is pleased to submit this response to the *Quality of assessment in vocational education and training – Discussion Paper*. We have included at the start some initial thoughts about the issue of quality assessment in vocational education and training, and then later on in this response included where appropriate some comments about the specific questions raised in the Discussion paper.

About ACER

ACER's mission is to create and promote research-based knowledge, products and services that can be used to improve learning across the life span.

ACER is one of the world's leading educational research centres. Our goal is to support learners, learning professionals, learning institutions and the development of a learning society through our work.

ACER has built a strong reputation as a provider of reliable support and expertise to education policymakers and professional practitioners since it was established in 1930.

As an independent non-government organisation, ACER generates its entire income through contracted research and development projects, and through developing and distributing products and services, with operating surplus directed back into research and development.

ACER was established in 1930, and has since built a strong reputation as a provider of reliable support and expertise to education policy makers and professional practitioners. As a not-for-profit organisation, independent of government, ACER receives no direct financial support and generates its entire income through contracted research and development projects and through products and services that it develops and distributes.

ACER has experienced significant growth in recent years and now has more than 350 staff located in Melbourne, Sydney, Brisbane, Perth, Adelaide, Dubai and New Delhi.

Significant current programs include international comparison surveys, diagnostic monitoring and achievement tests for students in schools and vocational education and training, senior secondary scaling and moderation tests, university placement and admissions tests, and assessments of graduate outcomes.

Our research and assessment capability

ACER's expertise in sampling, surveys, assessments and other forms of data collection, psychometric and data analysis, and reporting provides research evidence to improve learning across the lifespan.

Blending solid experience and creative talent with established methodologies, ACER is a full-service research consultancy specialising in collecting and interpreting information to shape strategic decision making at all levels, from the early years through to post-compulsory education.

ACER researchers work on a range of projects focusing on early childhood education, primary and secondary school, vocational education and training, and higher education, as well as the transitions between and beyond them. ACER examines key issues around improving teaching and learning,

analysis of policy and evaluation of educational programs. Research reports, working papers, conference papers and more are available in the ACER Research Repository.

ACER conducts a range of research in relation to student outcomes in school education, vocational, adult and workplace education, and higher education; teacher education and quality. We have been instrumental in the implementation, management and reporting of large-scale international surveys.

This work depends on ACER's expertise in sampling, survey management, and collection and marking of secure assessments. ACER provides high quality psychometric and data analysis, manages externally commissioned data analysis projects. ACER also undertakes research on psychometric and other quantitative research issues through the Psychometrics Institute. Staff expertise in these areas is also utilised in the design, implementation and analysis of smaller customised surveys for clients.

ACER develops assessment and reporting resources for a wide range of academic and non-academic educational outcomes. ACER staff develop test constructs, research test validity and reliability, develop assessment methods and resources, interpret psychometric data, and develop methods for item banking, online test delivery and reporting. ACER also has expertise in educational data mining to extract information from big data sets.

ACER has more than 100 research staff, more than 60 with doctorates, located in Melbourne, Sydney, Brisbane, Perth, Adelaide, Dubai, New Delhi, London and Jakarta.

Summary

ACER believes that now is the time to bite the bullet and do something significant regarding the state of assessment in VET. Improving the quality of final assessments in VET is critical but not enough on its own to drive change back through the system - there is the need to drive from the front as well.

There are NO quick fixes - this will take careful consideration and a range of coordinated strategies and financial commitment, but the cost of **not** doing this will be high – there is already clear evidence of a loss of faith in VET, and this was one of the issues leading to the development and implementation of this review and discussion paper into the *Quality of assessment in vocational education and training*.

ACER's recommendations on what is needed to move forward are summed up by these four major issues and concerns:

- The need to dramatically improve the capacity of the VET workforce to teach and assess formatively and summatively. This issue has been highlighted in the recent past for example by the Productivity Commission (2011) and Skills Australia (2010).
- The need for evidence that goes beyond consultation. What do effective assessment practices look like in different contexts? What does effective teaching look like and how do people learn VET skills?
- What is the evidence and research basis for reforming assessment practices in VET in Australia? There is a need to fund a body of empirical research focused on quality of teaching, formative assessment and actual learning (what can a VET graduate really understand and do in the real world as a result of undertaking this qualification?)

- Need to improve systems to assure quality Teaching, Learning and Assessment drawing on lessons learnt from other sectors and systems, and from sub sectors within VET.

It is clear that issues can no longer be ignored, glossed over or fixed with minor tweaks. Australia needs to learn from other systems that are recognised as having quality outcomes/effective QA processes. We need to look at the evidence from Higher Education, the schools sector, regulated industry areas (eg the trades); models such as the LLNP/SEE program of moderation/validation process, and lastly look internationally (for example, the UK, Scotland, US, Jamaica, Germany, and Scandinavian countries) to see what works effectively, and in what segments of the VET marketplace. A one-size-fits-all approach will not work.

Is there a problem with assessment in VET?

In order to have the ability for continuously improving the quality of teaching and learning in the Australian vocational education and training (VET) system, there is the need to review and reflect on VET's current practices and systems.

Current VET assessment practices focus on:

- summative aspects of CBT
- little emphasis on assessment for learning (formative) assessment practices
- monitoring, compliance and risk management based on a QA system driven by a regulatory, auditing process based around having comprehensive records and documents incl. of validation and moderation processes

There is little interest or emphasis on looking at or collecting empirical evidence about the quality of teaching and learning outcomes.

There are a number of issues that have been highlighted in reviews of the Australian competency-based VET system. For example, in its review of the VET system in Australia, the OECD recommended amongst other changes that there was the need for a broader range of quality and outcome data and also that consistency in standards should be achieved through a common assessment procedure to determine whether the necessary skills have been acquired. (OECD, 2008).

There has been ongoing research about assessment in VET. For example, Dickson & Bloch, 1999; Booth 2000 reported that in VET the key questions about CBA included:

- the need for grading of results
- the need to assess knowledge as well as skills
- concern about quality and consistency of assessment systems and competency standards.

The issue of assessment in a competency-based approach has its challenges. For example, in an address to ACER's inaugural adult LLN assessment conference in 2012, Rob Bluer from IBSA reflected:

"The assessment issue is critical. We have a fairly brutal way of doing it in VET – yes, you're competent, no, you're not. We need to think about that ... Assessment can inform teaching and training. At the end of the day the way we have constructed our competency-based training system, is that we make that harsh judgement – you're either competent or you're

not. And surely there's a way of ensuring on the way through that we can give advice to teachers about how they can use assessment techniques to inform the way they go about their job."

And more recently:

"In recent years the quality and rigour of assessments in vocational education and training (VET) have been key concerns for VET policy-makers, industry stakeholders, employers, and teachers and trainers. ... Assessment experts and commentators have identified the main issues as the lack of:

- systematic and regular moderation and validation practices in training systems to ensure the consistency and validity of assessments
- knowledge among VET practitioners about the processes and techniques of assessment." (NCVER, 2014)

And finally, this 2016 discussion paper about *Quality of assessment in vocational education and training* has resulted from concerns about the quality of assessment practices and outcomes in VET.

Changes need to be made and assessment in VET needs to be rethought if the quality of assessments and ultimately the outcomes of VET are to improve and meet the demands of the 21st Century.

But what role should assessment play and why rethink assessment in VET?

Masters (2013) notes that employers, in particular, have emphasised "the need for employees who can work collaboratively in teams, use technology effectively and create new solutions to problems" and goes on to highlight the work of the international collaboration known as the Assessment and Teaching of 21st Century Skills (Griffin, McGaw and Care, 2012)

By refocusing the understanding of 'system quality' in VET to include broader learning outcomes, policymakers, educators and employers can more effectively set goals and expectations and monitor progress of those outcomes crucial to addressing the needs of individuals, employers and society in the 21st century.

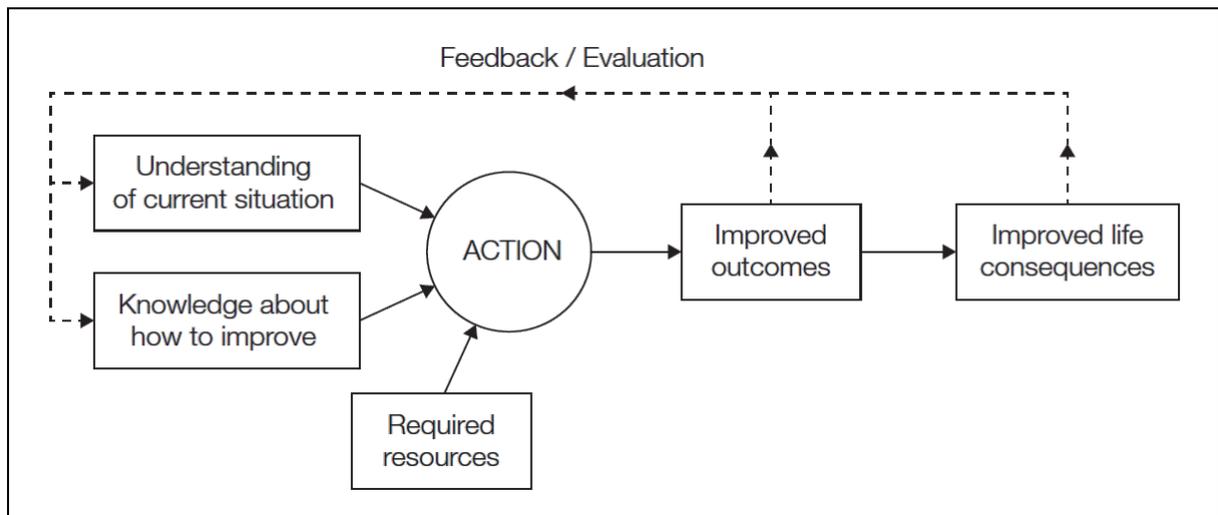
While there are various arguments in the field of educational assessment around appropriate assessment purpose, approach and methodology (for example, formative vs. summative, criterion referenced vs. normative referenced, etc.) in *Reforming Educational Assessment*, Masters describes "a simple unifying principle" of assessment:

- the fundamental purpose of assessment is to establish where learners are in their learning at the time of assessment.

Masters, 2013

Masters (2008) describes the process that teachers take in addressing the learning needs of their students as a 'decision making loop' in which a teacher's understanding of the current situation (i.e., an individual learner's current skills and knowledge), knowledge of how to address the situation and the resources required are translated into action which leads to improved learning outcomes. Once the action is complete, a feedback or evaluation phase provides the teacher with an updated

understanding of the situation and builds the teacher's knowledge about effective practices and required resources for action in the future.



Masters: <http://research.acer.edu.au/aer/12/>

Evaluation both of the starting point and the observed improvement is critical to the process. Fullan, Hill and Crévola suggest that:

In an ideal world the teacher would have precise and current knowledge of each student's starting points and also of what assistance each student requires to move to the next level.

Fullan, Hill and Crévola, 2006

Consistent and effective methods of assessing and reporting on the content knowledge and core skills of learners is crucial to student engagement and improved learning outcomes. Such assessment practices allow trainers to better understand individual learner strengths and weakness, how to set goals and targets for learners, where to direct attention, resources and expertise, and how to adapt teaching practice to achieve greater student success.

The Gordon Commission on the Future of Assessment in Education (USA 2013) illustrated the process in this way:

From

TEACH → LEARN → ASSESS

to

ASSESS → TEACH → LEARN

Emphasis on formative assessment at the beginning of, and throughout, a teaching/learning sequence:

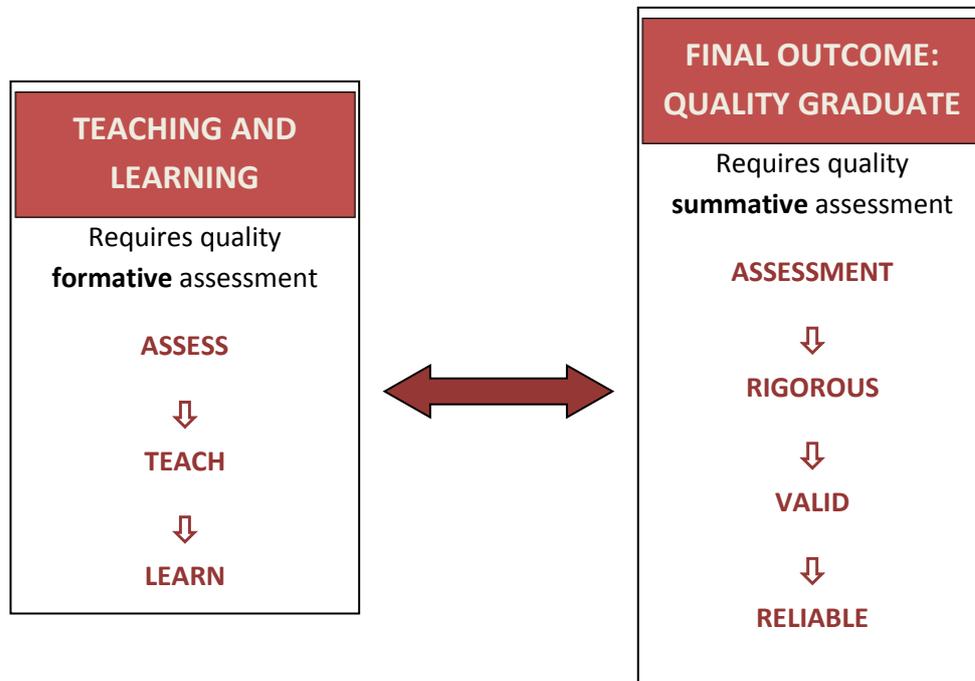
- identify specific gaps or needs
- monitor development of skills and understandings

- differentiate instruction.

<http://www.gordoncommission.org/index.html>

The need for a holistic view of teaching, learning and assessment in VET

A model for what is required regarding the connections between teaching, learning and assessment in VET is:



At present in the VET system, neither of these aspects are working well and producing quality outcomes across VET. There needs to be a much stronger link and holistic connection between both sides of the assessment picture in VET. The formative assessment should inform and lead into the quality summative assessment processes to influence quality outcomes.

This also relates to putting more emphasis on the E in VET – the Educational aspects of teaching, learning and assessment, not just on the training and assessment of competence. This relates to concerns raised by researchers about the need to assess knowledge as well as skills.

Approaches

Drive from the front and focus on improving capability of workforce re Teaching and Learning and role of formative and summative assessment

- TAE Certificate IV is the fulcrum of the whole VET system but is currently not operating or being implemented effectively or with quality outcomes. For example:
 - NOT equivalent to a Certificate IV in many other areas - if a trainer can get a qualification so easily some may think they can apply the same low standards to their own field
 - Does not represent ability to teach or formatively assess effectively, often more likely to be about how to navigate the VET system and regulations and satisfy

bureaucratic requirements re final assessment not about how to get learners successfully to that point

- many deliveries of the TAE Certificate IV don't involve AQF aligned volume of learning
- Final assessments not rigorous, consistent or valid.
- Take the TAE Certificate IV out of the norm - treat it differently e.g. make it a licensed course and only able to be delivered by approved providers.
- Urgent need to build pathways with skills sets and a range of TAE qualifications and pathways with the TAE Certificate IV As the starting point and not the end point (and ignore the complaints from the field about making it too hard to recruit trainers – it is imperative to have quality teachers and trainers). Any trainer who has the skills will be able to demonstrate these and get recognition).
 - See TAE Certificate IV as the minimum entry level but holder MUST continue to add skill sets and further qualifications, learn on the job with mentoring etc to gain a higher qualification
 - useful filtering mechanism to identify those with skill and motivation to teach that doesn't require long lead time of pre-training and reflects VET principles
 - Look at overseas examples – e.g., US certification programs, and UK distinction between trainers and teachers
 - Need specific higher level qualifications and skill sets that promote and develop skills in assessing for learning.

Drive the system from the end point – investigate a range of options (or maybe a combination, but needs to be explored further) that could include:

- Create and legislate for progression through the VET workforce and create, support and build pathways with skills sets and a range of TAE qualifications, including New classes of “expert” trainers and assessors within RTO with higher qualification than TAE Certificate IV, and some with specialist focus on Assessment
- Industry based external moderators/validators for qualifications with clear industry focus (e.g., look at SEE model - combined PD and quality assurance)
- External auditors using risk based model as per existing model
- Industry run regulators to certify qualifications on similar lines to trades - student applies and pays registration fee (e.g. plumber) Governments could choose to cover all/part fees in specific cases of skill shortages/low wages, e.g. childcare
- External organisations ‘own’ certificates (see UK model) and have vested interest in ensuring they are vigorously assessed so they maintain value in the marketplace (No-one owns our qualifications so no-one cares?)

Technical versus Further education?

Maybe two types of qualifications and related qualifications and registration systems could be considered – one for the technical industry specific vocations and one for the more Further education focused qualifications.

- Industry specific vocations with regulation/certification run by Industry with external, quality assessment processes (jointly managed by organisations with Industry knowledge in collaboration with independent, specialist assessment/testing organisations)
- Generic Further education qualifications (e.g. business) with no clear career destination or participation with management through a quality system along the lines of what exists now, but with improvements to processes as outlined elsewhere.

Supporting and implementing change

Some processes could be put in place to help implement some of the above changes progressively, including:

- Keep the TAE Certificate IV as is initially but make it the first step in a mandated progression and don't let holders conduct final assessments
- Fund PD and mentoring programs to improve ability to use assessment to establish where a learner is, to inform design and delivery and to provide specific actionable feedback for learners (the Assess – Teach - Learn process)
- Implement a trainer registration process with external assessors (through ASQA) to keep track of development. Make sure ASQA system is thorough and effective – but not just on checklist of regulations - needs to improve focus on teaching aspect (e.g., look at UK OFSTED model)
- There is a need for a quality VET capability framework as a common language:
 - not necessarily another one based on consultation with the industry- you will just get more of the same with industry players setting a low bar and resisting any moves for significant raising of standards and expectations
 - current IBSA one does not go anywhere near far enough and has had little obvious impact
 - a new one needs to build on evidence based research not just literature reviews and consultation. There is a LOT that we know about effective teaching and learning in other settings that does apply to learning in general and in VET (e.g. don't reject all of the work done in the schools sector). ACER has its own set of capability analysis frameworks and tools for the VET sector. See following section.

Capability analysis tools for workforce development

The following comments are in relation to the section of Chapter 1 of the Discussion Paper entitled 'Development of a capability framework'; that is, the discussion set out on page 15 of the document.

The comments below include and extend the points formally tabled by Dr John Mitchell, our Lead Consultant, ACER JMA Analytics, when the Working Group consulted him on 25 February 2016.

As background information on ACER's capability analysis frameworks and tools for the VET sector, a pdf version of a booklet is forwarded with this submission. The booklet is entitled 'Capability analysis tools for workforce development and organisational performance improvement'.

Summary responses to questions

Our summary responses to the two questions posed on page 15 of the Discussion Paper are provided in Table 1.

Table 1. Summary responses to the questions

| Question | Summary response |
|--|--|
| <p><i>Q1. What can be learnt or applied from the capability frameworks that have been developed or are currently being developed?</i></p> | <p><i>Based on experience with the ACER capability frameworks designed for VET practitioners, we have learnt, among other things, that:</i></p> <p><i>(1) To be effective, a capability framework needs to be based on extensive research, rigorous testing and ongoing refinement.</i></p> <p><i>(2) Ultimately the capability framework is less important than what people do with it. Building on its capability frameworks and tools, ACER has developed a systematic approach to using capability frameworks to identify and develop staff skills that can provide benefits to an organisation, teams and individuals for up to three years. This systematic approach has been used in RTOs around Australia, including in over half the TAFE Institutes and a selection of other RTOs, since 2010. The benefits of this systematic approach to capability development are recorded in 18 interviews and multiple presentations by clients at http://jmaanalytics.acer.edu.au</i></p> |
| <p><i>Q2. Is there an opportunity to make better use of these frameworks, irrespective of proposals to develop a professional association?</i></p> | <p>Yes.</p> <p>ACER’s capability frameworks and tools are used effectively by many of Australia’s TAFE Institutes and a range of other providers, and we believe that their wider use in the VET sector will increase the benefits nationally.</p> <p>The ACER frameworks are used in VET without the support of a professional organisation. We are not opposed to such an organisation; we are simply sharing our finding that an association is not essential to the effective use of the frameworks.</p> |

Suggested actions

ACER is open to the possibility of discussing a range of options with the Working Party or its representatives or the Federal Government about how the whole VET sector could benefit from immediate access to and implementation of ACER’s capability frameworks, tools and processes that have been developed and improved over the last decade and continue to provide benefits to RTOs and VET practitioners around Australia.

For ACER, these discussions would be led by Ralph Saubern, Director Professional Resources.

Fuller responses to the discussion paper

Set out below are fuller responses to the points raised in the two paragraphs on page 15 and to the

two questions.

The first paragraph on page 15 consists of one sentence and ACER agrees with it, because we have seen our capability frameworks provide a common language for the knowledge, skills, behaviours and attitudes for professional practice as a VET trainer and assessor. Clients around Australia who have used the capability frameworks and tools since 2010 have said this in a range of documented interviews and presentations that are accessible from the ACER website, <http://jmaanalytics.acer.edu.au>

For example, a client from TAFE SA said in an interview available at that site, specifically at <https://jmaanalytics.acer.edu.au/user-benefits/client-interviews> :

Any unexpected responses from faculties to the VETCAT™ data?

(Response from TAFE SA project director:) One of the other responses I am receiving is, as one of the faculty managers said, *the lecturers now have a language to describe what they do*. So every document I put out I'm using that language and we will make the language part of how we talk about our capability in the institute. They are words like established and specialist and also the skills of foundation practice: learning style, learning theory, pedagogy, andragogy; that sort of language.

A related finding is that a number of RTOs we have worked with have changed their annual performance reviews to incorporate language from the CATs. For example, please see this exchange in an interview with TAFE NSW - Western Sydney Institute (WSI) which is also on the ACER website:

How else are you using the VETCAT® data?

(Response from WSI project director:) For the annual teacher review process, we're going to be really strongly encouraging head teachers to encourage staff to use their VETCAT® reports as part of that process.

Hence, we agree with the first sentence on page 15 and we have proof that this happens.

The second paragraph on page 15 of the Discussion Paper refers to only one capability framework developed by IBSA. We suggest that the evidence provided at <http://jmaanalytics.acer.edu.au> demonstrates the unique national contribution of the ACER capability frameworks to improving the capability of VET practitioners.

Some brief words follow about the ACER capability analysis tools, all of which are based on rigorous, research-based capability frameworks:

- The seven tools that have underpinning frameworks are:
 - VETCAT® – the tool to assist trainers and assessors to improve their skills
 - CURCAT® – the tool to assist trainers and assessors to improve their industry currency
 - COMPLETIONCAT® – the tool to assist all staff, including trainers and assessors, to better support students through their learning journey
 - GROWCAT® – the tool to assist all staff in any organisation, not just RTOs, to develop skills in business acumen, business development, innovation and entrepreneurship

- ADMINCAT® – the tool to assist people to improve their workplace skills in administration
- MANAGECAT® – the tool to assist managers identify and develop their contemporary skills
- LEADCAT® – the tool to assist leaders identify their leadership traits, styles, behaviours and skills.
- Four of the 7 CATs we have developed are directly relevant to the VET practitioners for whom training and assessment is part or all of their job. They are:
 - VETCAT® (launched 2010)
 - CURCAT® (2010)
 - COMPLETIONCAT® (2013)
 - GROWCAT® (2013).
- Since 2010, the CATs have been used in around 109 projects at over 30 TAFE Institutes and at a number of non-TAFE, private, enterprise, community-based and not-for profit RTOs. The CATs have also been used by state government departments in NSW and SA.

In relation to the first question on page 15, *What can be learnt or applied from the capability frameworks that have been developed or are currently being developed?* we would like to table some of the key findings we have acquired about the capability frameworks we have been involved in developing.

- (1) *A capability framework needs to be based on extensive research, rigorous testing and ongoing refinement.*
- (2) *Ultimately the capability framework is less important than what people do with it. Building on its capability frameworks and tools, ACER has developed a systematic approach to identifying and developing staff skills that can provide benefits to an organisation and individuals for up to three years.*

In relation to point (1), we would like to briefly describe the research bases of four of the CATs, VETCAT®, CURCAT®, COMPLETIONCAT® and GROWCAT®

- the capability framework that underpins **VETCAT® and CURCAT®** is the direct result of six years of concentrated research led by Dr John Mitchell that began with the NCVET report for which he was the lead author in 2006, 'Quality is the Key', and was followed by three further publications he issued in 2007-2009 ('Ideas for Practitioners' 2007; 'Innovation and Entrepreneurship in VET' 2008; 'Advanced VET practitioners' 2009), and numerous reports on good practice in VET RTOs as well as two reports he provided to the Queensland government in 2008-09 and to various other bodies.
 - One of the QLD govt reports, in 2008, was on the skills of advanced VET assessors in using their professional judgement.
 - The other QLD project, in 2009, was entitled: "National environmental scan and stocktake of professional learning strategies, resources and networks focussed on building VET practitioner skills in assessment". This project had a major impact on VETCAT®, particularly because, as a result of the project, John and his research partners were able to identify the dimensions of assessment practice for a VET assessor.

- Demonstrating transparency, the capability framework that underpins VETCAT® was shared with the sector in January 2010 in a 50-page report made available for free to the sector.
- The capability framework that underpins VETCAT® and CURCAT® has been continuously refined since 2010 based on changes in practice and from qualitative evidence gained from workshops and meeting with client organisations.
- The capability framework that underpins COMPLETIONCAT® was the result of six national research projects undertaken by Dr John Mitchell from 2009-2012 that examined all the factors that affected VET trainees and apprentices and other students, in terms of their attraction, recruitment, enrolment, induction, engagement, support, retention and completion. See for instance:
 - <https://www.acci.asn.au/resources/systematic-approach-retaining-apprentices>
 - <https://www.acci.asn.au/resources/its-not-about-age-pathways-engaging-mature-aged-people-existing-workers-apprentices>
 - <https://www.acci.asn.au/resources/worth-their-weight-gold-practical-strategies-engaging-retaining-disengaged-apprentices>
 - <https://www.serviceskills.com.au/sites/default/files/files/Publications/Prior%20to%202014/Benefits%20of%20Accurately%20Measuring%20Noncompletions.pdf>

In addition to providing customised questions for other staff within an RTO, COMPLETIONCAT® tests 149 skills of the VET trainer and assessor including their assessment skills and how these skills assist student learning and engagement.

- The capability framework that underpins GROWCAT® was not only based on a review of the international literature, it was also based on ten publications John Mitchell produced on innovation and entrepreneurship. One of the documents we supply CAT clients is entitled “Research foundations of GROWCAT” and this document cites those research publications.

Hence our first response to the first question on page 15 is a capability framework needs to be based on extensive research, rigorous testing and ongoing refinement.

Our second response to the first question on page 15 is that ultimately the capability framework is less important than what people do with it; and we have developed sophisticated systems for providing individuals and groups who undertake the surveys we developed with reports that we have found will be of value to them for up to three years. This is validated by the 18 interviews on the ACER website; and the national forum presentations.

In relation to the second question on page 15, *Is there an opportunity to make better use of these frameworks, irrespective of proposals to develop a professional association?* The answer is Yes and we would like to table the following comments:

- We know that a capability framework for the VET practitioner – not just as an assessor but as a multi-skilled professional – cannot be covered by one framework (like IBSA’s and the emerging one in VIC) that only focuses on teaching and industry engagement. The VET practitioner needs further skills to function as an assessor and trainer in diverse contexts (and in a more competitive sector) and the expectations on the VET practitioner are growing (e.g. to support the student, hence COMPLETIONCAT®, and to support the organisation’s business growth, hence GROWCAT®). Assessment occurs within these contexts (e.g. of industry clients and individual students expecting high quality assistance); and VET assessment is not divorced from these contexts.

- ACER has four interconnected capability frameworks upon which capability analysis tools are based. The four tools that identify the skills, learning preferences, aspirations and motivations of the VET practitioner are VETCAT® (training and assessment skills), CURCAT® (strategies for maintaining industry currency), COMPLETIONCAT® (149 skills for teachers in supporting students, from initial inquiry to graduation; including trainers' assessment skills) and GROWCAT® (132 skills in business acumen, business development, innovation and entrepreneurship).
- COMPLETIONCAT® and GROWCAT® were launched in mid-2013 and then used with RTO workforces around Australia. They were invented partly because the world of the VET practitioner changed significantly between 2010-13 with the introduction of competitive funding. They add to VETCAT® and CURCAT®, launched in 2010 and subsequently updated (notably VETCAT®, CURCAT® and COMPLETIONCAT® incorporate the Standards for RTOs 2015).
- Each of these four CATs has been evaluated by the ACER Institute of Psychometrics and proven to provide valid, reliable data. As another sign of transparency and sharing, the Director of the Institute, Dr Siek Toon Khoo, has provided formal presentations on her analysis of the tools at the annual forums for CAT clients from 2011-2014.
- No other organisation in Australia has such data about the VET professional. The datasets from each tool have been collected over a period of six years for VETCAT® and CURCAT® and four years for COMPLETIONCAT® and GROWCAT®, so we also have tracked the changing and emerging capabilities of VET practitioners over time; we have data over a time sequence that is high value to the sector. For example, we know exactly the strengths of VET assessors and their weaknesses and how these have changed over the last six years.
- The CATs are much more than a capability framework and an online tool; our clients validate in the interviews and presentations on the ACER website that the CATs provide unique insights and promote a sophisticated workforce development process that can underpin professional renewal and growth over a two-three year period.
- Many of our CAT clients have participated in confidential benchmarking activities with each other and we note the high value our clients place on the national averages we provide to them.
- Admirably, ACER publicly shares much of its valuable knowledge. Our website contains 18 interviews with clients from VET organisations that have used the CATs, as well as the presentations from all five national CAT forums held in Sydney and a wide range of papers and presentations. Specifically in relation to the skills of the VET trainer and assessor, we commend to you the interview provided by the RMIT client Marilyn Capper last year on RMIT's use of VETCAT in 2014.
- As a further indication of the way capability frameworks that are built into our tools and systems add enormous value to RTOs, the titles of some of the client interviews are as follows:
 - VETCAT® interview: [Tying together performance management, PD planning and skills updating](#) (TAFE SA)
 - VETCAT® interview: [How to use strategically VETCAT® data about capabilities](#) (NSW TAFE Western Sydney Institute)
 - CURCAT® interview: [Linking staff engagement, currency, motivation and professionalism](#) (NSW TAFE New England Institute)
 - VETCAT® and CURCAT® interview: [Clarifying the workforce of the future](#) (Swinburne University)
 - VETCAT® and CURCAT® interview: [Overtly marketing the skills of VET practitioners](#) (TAFE QLD).

- A previous client who, as the project director, used VETCAT® and CURCAT® twice in her TAFE Institute, in 2010 and 2012, is now half way through a doctorate at Flinders University in which she is focusing on the insights gained from the CATs and the positive influence they had on improving VET practice in her Institute.
- On 15 March 2016, we are conducting another public seminar on the capability analysis frameworks and tools, this time in Brisbane on COMPLETIONCAT®. This follows seminars in Sydney and Melbourne last September on all of the CATs.

As a brief answer to the second question, we have shown since 2010 the sector can learn from the ACER capability frameworks without developing a professional association.

References

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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:

See Section above on page 7 headed “Approaches”.

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:

See above.

We do not think it is appropriate to form judgements about changes to the TAE based solely on majority considerations from the field – needs to be based on evidence and a research base on what works.

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:

ACER does not believe that the establishment of a national professional association for Australia's VET system would address or improve many of the issues being addressed within this discussion paper.

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:

See above

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:

See above

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:

See discussion on pages 9-15 under the heading “Capability analysis tools for workforce development”.

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:

- Use Industry based external moderators/validators for qualifications with clear industry focus (e.g., look at SEE model - combined PD and quality assurance)
- Use external auditors using risk based model as per existing model
- Use Industry run regulators to certify qualifications on similar lines to trades - student applies and pays registration fee (e.g. plumber) Governments could choose to cover all/part fees in specific cases of skill shortages/low wages, e.g. childcare
- Consider external organisations 'own' certificates (see UK model) who have vested interest in ensuring they are vigorously assessed so they maintain value in the marketplace (No-one owns our qualifications so no-one cares?)

Technical versus Further education?

Maybe two types of qualifications and related qualifications and registration systems could be considered – one for the technical industry specific vocations and one for the more Further education focused qualifications.

- Industry specific vocations with regulation/certification run by Industry with external, quality assessment processes (jointly managed by organisations with Industry knowledge in collaboration with independent, specialist assessment/testing organisations)
- Generic Further education qualifications (e.g. business) with no clear career destination or participation with management through a quality system along the lines of what exists now, but with improvements to processes as outlined elsewhere.

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:

- For Industry specific vocations use regulation/certification run by Industry with external, quality assessment processes (jointly managed by organisations with Industry knowledge in collaboration with independent, specialist assessment/testing organisations)

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:

See above and pages 3-9.

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

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:

See above.

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:

See above

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