



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.

Please note, we provide feedback only to Chapter 1: Foundation reforms, as the area of the VET teaching/training workforce and its quality and qualifications forms the specific focus and expertise of our organisation.

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:

Our comment begins with a general preamble about the group submitting this response (the Australian Council of Deans of Education Vocational Education Group) and also our position on VET teacher qualifications, which is that more teachers/trainers should be qualified to degree level. We then go on to specific responses to the discussion questions posed.

Background

The Australian Council of Deans of Education (ACDE) is the peak association of the Deans of Faculties of Education in Australian universities and other higher education institutions. Ten universities currently provide teacher-training qualifications for vocational education and training (VET) practitioners. Representatives from each of these universities form ACDEVEG. Our students undertake VET teacher-training programs, from associate degrees through to graduate diplomas, as well as more advanced 'post-initial' and specialist courses (e.g. in language, literacy and numeracy teaching). Almost all VET teacher-training students study part-time while working in the VET sector.

They are all mature-aged, and have had previous careers in industry as well as relevant industry qualifications. They generally receive credit for these previous qualifications.

ACDEVEG has been working for five years to improve the status of VET teachers and their qualification levels. We feel this is fundamental to the quality of the VET system as a whole.

We wish to begin by saying that while it is important to improve the content and delivery of the Certificate IV and Diploma of VET, the deep-rooted problems with assessment in VET will not be solved until a higher proportion of the VET teaching and training workforce is qualified to degree level in VET teaching and training. Full-time TAFE teachers were formerly required to gain such qualifications (after entry to the occupation, in most cases) but this requirement was progressively removed by TAFE systems from 2000 onwards. While some people still undertake higher-level qualifications by choice, there is a dwindling proportion of qualified people in the VET workforce as qualified people retire. Recent and current research shows clearly that VET teachers and trainers with higher-level qualifications are valued by their students and their employing RTOs.

An example from current research follows:

In a case study at a not-for-profit RTO, the RTO manager reflected on the differences in confidence and professional agency and judgement between his RTO's English language, literacy and numeracy (LLN) teachers (who were teaching on government programs and were required by the programs and the curriculum to hold specialist postgraduate teaching qualifications), and their other VET teachers, none of whom had higher education teaching qualifications, in their approaches to teaching. He observed:

'I think the big difference between the language teachers that are highly qualified is that they do it without a [safety] net. They teach without the textbook. The VET teachers follow the script which doesn't necessarily work for everybody. I think the really good trainers are the ones who can follow the discussion wherever it goes, lead a group to have a discussion, bring it back, make it relevant and at the end of it say okay we've covered something of what's in that unit but we've done enough of other stuff that you now know what you want to do. ... That's probably a bit more [what] the language teachers do.'

He added that the LLN teachers work as a community of practice, collaborating on pedagogical strategies and problem solving which he has not seen the other teachers do. He speculated that these differences might be attributable to the confidence that the LLN teachers gain from their higher level teaching qualifications.

Responses to discussion questions on RTO limitations

Whatever decisions are taken about higher qualification levels, and the proportion and types of VET teachers/trainers who should hold them, the problems with TAE delivery and content need to be addressed immediately. We welcome this debate and offer the following comments.

1. We suggest that only a limited number of RTOs should be able to offer TAE qualifications. These RTOs should be 'accredited' to do so by a national training and assessment accreditation body (which could be called 'TAAB') with a board of appropriate experts.

2. While it is far from ideal that people study qualifications within their own organisation, we do not consider this matter to be a particular problem with TAE qualifications, except insofar that some providers are poor quality anyway. Item 1 would remove those providers.
3. RPL should not be available in TAE qualifications. People often use RPL to cope with frequent 'updates' of the Certificate IV, but the latter problem should be addressed in a more holistic manner (see below). In any case, VET teaching/training is too important an area for RPL to be adequate. Moreover, because assessment (in particular) is currently done badly, those seeking RPL and unlikely to be currently doing it well.
4. Changes to TAE qualifications:
 - TAE qualifications should, of course, be delivered by people with an employment history in VET teaching/training, but this is really covered by normal industry currency rules.

- We propose that those delivering the Diploma of VET should hold a higher education qualification in VET teaching (Associate Degree/Degree; or Graduate Diploma for people who have discipline/industry degrees). A higher education qualification in VET teaching is also preferable for those delivering the Cert IV TAE. But realistically the current requirement (either a Diploma or a higher education qualification in adult education) for those delivering the Cert IV would probably need to remain for a transition period. All RTOs accredited to deliver TAE qualifications should be required to employ, in the TAE area, at least one teacher/trainer with higher education qualifications in VET teaching. This person should be required (and accountably so) to monitor the quality of the curriculum and delivery. (Degree-qualified teachers who worked in other discipline areas would not normally count for this purpose, unless they took an active role in the TAE discipline, which would need to be specified).

We argue that ultimately as many VET teachers/trainers as possible should hold a higher education qualification in VET teaching, just as teachers in other sectors do. The fact that VET teachers have industry qualifications and experience does not negate the need for high-level teaching/training expertise.

- All TAE qualifications should, of course, include a practicum and we consider that this should be at least 50 hours of supervised teaching/training for the Certificate IV. We consider that the current requirements for teaching and assessment practicums for the Diploma of VET are acceptable.

- We cannot see why those wishing to enter the TAE Diploma should be required to show employment history as VET practitioners. They would gain some workplace experience through the practicum in their Cert IV and their Dip VET studies, and would not be eligible to teach TAE qualifications without industry currency (i.e. currency as VET teachers/trainers). We do not support introducing too many extra rules around the qualification; fixing the basics (improving the quality of the RTO base, the staff involved in the delivery of TAE, and the inclusion of a proper practicum in the Cert IV) would reduce the need for extra safeguards.

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 core aspect of VET, and while there are specialist knowledge and skills that VET practitioners need to have in order to plan, design and conduct assessment in VET, assessment should not be regarded as a separate activity from teaching/training: assessments are best conceptualised, planned and designed together with teaching/training strategies when designing and delivering a program. Moreover, removing the responsibility of assessment from teachers risks removing a critical level of accountability from the teachers, and one where valuable feedback is gathered to improve learner outcomes, so it could further damage the quality of VET learner outcomes. It is understood, however, that currently in Australian VET, assessment is often regarded in isolation.

The assessment tools unit of competency should be a core unit in the Certificate IV, because devising assessment tasks is an essential part of any teacher's/trainer's role in any education sector including VET. However unless the provisions for RTO accreditation and higher-level qualifications for those delivering the Diploma are introduced, this unit will be poorly taught because those teaching it will not have a good understanding of the area. Meanwhile ACDEVEG could offer advice on ways of improving the delivery. Standardised learning materials for the unit of competency would be one way of addressing this, but they must be of high quality and reviewed by an expert panel, and we consider this would be a short-term solution as really anyone delivering this unit should be a true expert in the topic.

In higher education VET teaching qualifications, VET assessment is taught in an in-depth and critical manner, enabling teachers/trainers to act with more confidence and understanding rather than simply working with templates. We have many examples of how VET assessment is taught in university VET teacher-training qualifications, which help to explain why higher-level qualifications are important to be able to teach the assessment tools unit properly.

We provide below one example from a staff member at a university offering VET teacher-training:

'In an environment where TAFE teachers do not, currently, have to have a degree in adult/vocational education, it's always been an interest of mine to find out why TAFE teachers enrol in such a course. In the (nearly) ten years that I've been asking that question, the desire to 'do assessment better' is a common theme. It seems that the natural instinct of a good teacher is to see assessment as an integral part of the teaching/learning process, but too often the TAFE teachers may feel that assessment becomes more of an administrative chore – a paper-gathering exercise that sees them signing off on log books and spending way too much time preparing what is required to 'get them through an audit'. What they find most rewarding, and useful, about their Higher Education experience, is that they learn how to truly make assessment valid, fair, flexible and reliable. They become more confident to make decisions based on the students' performance rather than how many pieces of paper they have in front of them. Importantly, they feel more confident to defend their assessment decisions, not just to students, but to their managers, auditors and other stakeholders. This level of knowledge, which they recognise is underpinned by research and educational theory, results in a much better experience for the student, and for their institution. It's that kind of knowledge, and confidence, that does not come with a Cert IV TAE, and particularly so when it may have been RPLed, or completed through a 'less than rigorous' RTO.

We agree that updates to TAE are too frequent and are overly subject to pressure for particular purposes and passing imperatives. We are not really sure what 'majority' considerations mean, but the end in sight should be high quality delivery of training. We suggest that the proposed national body responsible for accrediting RTOs to deliver the TAE qualifications (which we call 'TAAB') should manage and advise on updates, with due consideration, of course, for normal Training Package processes.

We need to stop the frequent tweaks to the Certificate IV, which often have the opposite effect from that intended, as people are pushed through particular units without learning anything. Instead, it is better to fix the qualification for a reasonable period of time, to expect more VET teachers/trainers to study at a higher level, and to address particular issues that arise (or are identified from time to time) through specific designated and high-quality professional development, which might contain assessment if appropriate. The national accreditation body ('TAAB') could accredit such PD programs on topics that are designated of national significance.

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:

We feel that a national professional association may well be useful for many people, and may be an interesting focus for some practitioners. However it is not likely to be able to address the basic problems caused through an undereducated VET teaching/training workforce. Moreover, the size, complexity and diversity of the VET workforce makes this, or the idea of registration, very problematic. We also feel that more VET teachers undertaking higher-level and higher-quality qualifications will help to re-create networks of teachers/trainings as happened during the 1980s and 1990s (and later, in some jurisdictions) among those undertaking degrees in VET teaching.

We suggest, instead, that the idea of a professional association should be taken up in a more targeted way. Rather than a necessarily huge investment of resources on a professional association for VET practitioners, we believe that a more effective and targeted use of resources would be the establishment of an association of VET teacher-trainers, which we suggest could be called ‘VET TeT’. Membership would be open to people delivering the Cert IV, the Dip VET and higher education qualifications. There would be a very productive flow of information and skills among a group such as this, who would all be committed to improving the quality of the VET workforce. ‘VET TeT’ would also be a useful forum for dialogue and information flows with the Department, ASQA and other bodies.

An association of those responsible for educating/training the VET teacher-education workforce would address the problem at its roots - i.e. would help to ensure that all teachers/trainers are prepared properly. It would help to ensure that new generations of VET teachers/trainers, studying at all levels, would be taught by well-informed people who were engaged in a community of VET teacher-educators. This association would be of a manageable size. Active and engaged membership of such an association could be a feature which those responsible for accrediting RTOs to deliver the TAE qualifications could easily use as a quality indicator.

The ACDEVEG conference of December 2015 which brought together over 120 VET teachers/trainers and VET teacher-educators from universities and from VET providers could be seen as a first step towards this association or grouping.

There is an existing network of those delivering the Cert IV and Dip VET in Victoria (the VPN) and probably in other States/Territories; ACDEVEG provides a similar service for higher education sector VET teacher-trainers, although generally only one person from each university attends ACDEVEG’s regular meetings. These organisations are run on a volunteer basis and although they have interactions with other stakeholders, the interactions are not necessarily strategically structured.

VET TeT could be managed and hosted by an organisation such as the VET Development Centre.

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:

In summary we propose a more targeted form of professional association for VET teachers/trainers, that is one aimed at VET teacher-educators.

We propose the two new bodies already mentioned, with proposed functions summarised as follows:

‘TAAB’ the Training and Assessment Accreditation Body:

- Accredite and monitor TAE providers and higher education VET teacher-training providers;
- Evaluate and advise on requests for changes to the Certificate IV;
- Accredite specific PD programs in significant topics, that might substitute for constant changes to the Certificate IV, for the existing VET workforce;

‘VET TeT’ the VET Teacher Trainers’ association:

- Development activities for VET teacher-educators who are teaching VET teacher-training programs from Cert IV TAE or degree level;
- Conduit for information to and from DET, ASQA etc to VET teacher trainers.

As already flagged, VET TeT could be managed and hosted by an organisation such as the VET Development Centre.

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:

See previous answers.

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:

The various capability frameworks that have been developed over frequent years are all helpful and will, one hopes, be used by RTOs for professional and career development processes. They have all been developed following wide consultation.

Through the Australian Council of Deans of Education Vocational Education Group (ACDEVEG) the universities which provide VET teacher-training made substantial invited contributions both to the IBSA framework and to the Queensland College of Teachers framework.

As providers of higher education courses, we use these frameworks as they are developed, to ensure that our courses are consistent with current thinking in the sector around capabilities of VET teacher/trainers. They should be used by providers of the Cert IV and Dip VET for this purpose.