



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

### Key consultation areas

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

#### Chapter 1: Foundation reforms

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

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

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

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

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

### How to provide feedback

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

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

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

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

## Submission details

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

## 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:

From an industry perspective: We need a relatively simple, inexpensive structure that industry personnel can access to ensure that they have an understanding of vocational training, and so that relevant personnel can develop (or have recognised) effective skills in mentoring and training and the knowledge/ability to engage in appropriately stringent assessment.

It is unrealistic and unnecessary to expect industry personnel who may be engaged in training and assessment while doing our 'day' jobs to have high levels of qualification and formal certificates in TAE. Other than the industry personnel who have a dedicated formal training role, and may appropriately hold such qualifications, this is most of us.

Recognition processes are appropriately used in and useful for industry. In an industry context personnel have an interest in ensuring its quality—for reasons below.

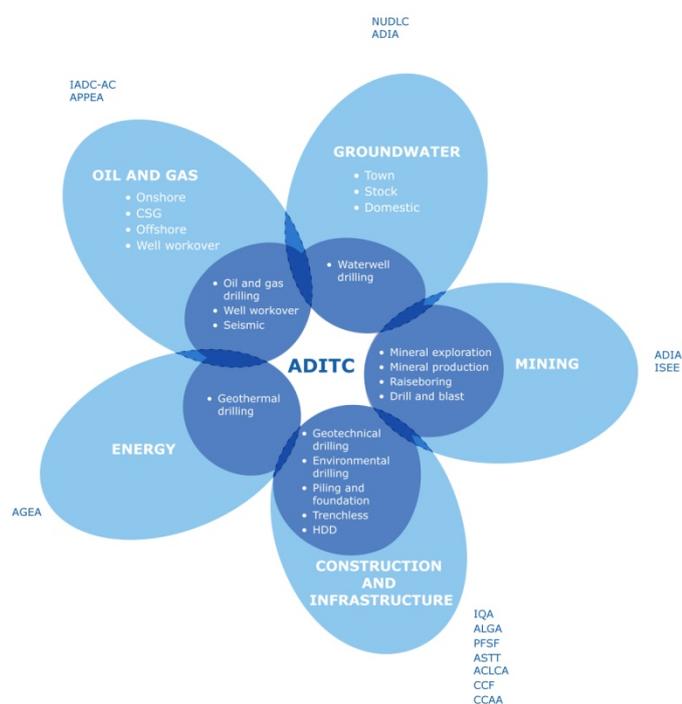
It's very self-important to feel that *TAE qualifications and skill sets so significant that evidence of competence should not—or cannot—be appropriately demonstrated via recognition of prior learning*. In industry it is possible to confidently recognise the skills of personnel who are in charge of equipment and machinery worth millions of dollars and on whose appropriate use of which others' safety, wellbeing and even lives depend.

The terms 'industry' and 'industry engagement' appear throughout this and other recent discussion papers without any clear or specific definition of its meaning. As a consequence individuals have assigned their own subjective meaning to the term, and this meaning will differ widely amongst individuals. Terms such as 'industry-directed VET', 'industry-defined qualifications' and 'industry-input' are broad statements of intent rather than specific meaning. Of course VET should be 'industry-led' but, in the absence of an agreed definition of 'industry', the processes for directly engaging industry in VET activities, including validation of assessment remain vague and poorly focused.

Industry = the individuals, companies and industry organisations in any given industry.

For us, the drilling industry =

## Drilling Industry Sectors



## 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:

No comment provided.

### 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:**

Wouldn't this be a private NFP enterprise?

Do these not already exist?

Membership should NOT be mandatory in any such body, however constituted.

#### 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:**

No comment provided.

#### 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:**

No comment provided.

## 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:**

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:

It needs to be remembered that company personnel and companies (= industry ) are busy doing, and appropriately focused on doing, whatever their business does. For industry training and assessment are an appropriate means to an end – doing the business well – not an end in themselves.

It is also important to remember that most industry personnel engaged in the process in an advisory capacity (such as IRC members) are there in a voluntary capacity.

Using the model of the ADITC's RTO: Currently the means of ensuring that industry involvement occurs in assessment is to engage the supervising person in both the training and the assessment as a content expert, and to require their signoff of the assessment outcome. That seems like enough.

However there is no requirement that we are aware of that all RTOs to the industry maintain that standard.

Externally administered tests? ???!!! NO, unless it's an **existing** industry requirement like licences. It's appropriate for theoretical training – as universities do at the end of course. This is appropriate for licensing structures where a permit to practice has to be awarded. However for qualifications which have a much broader application in applied learning it's a retrograde step and cannot establish length of experience or even depth of applied knowledge in any convincing way. Why bother with a competency structure which is in company trained and assessed, or industry involvement with the process at all if you return to external administration?

### **National recognition and 'transferability' of qualifications are what we value**

In terms of awarding a qualification, the drilling industry only engaged in 'recognised training/qualifications' (i.e. nationally accredited by government) when the opportunity for formalising recognition of in house in company training came along with CBT.

The essential characteristic of the national VET system, and its major benefit, is the transferability of VET qualifications. For business enterprises, especially those with multi-State operations and contractors who work across state boundaries (and indeed across national boundaries in some aspects of drilling), the importance of national consistency and transferability of qualifications cannot be overstated. However, the degree of transferability is very dependent upon striking an appropriate balance between generic and site-specific content associated with the qualification. This is a very interesting aspect of VET training that sometimes leads to accusations that VET training delivered within a particular enterprise is 'over-contextualised'.

Clearly it is neither efficient nor sensible to expect any VET provider to deliver training and assessment that covers all of the potential site-specific content associated with the various employers a person may encounter when they seek employment or to change jobs. For example, an RTO delivering a Certificate III qualification in crane operation would not reasonably be expected to train and assess students to operate the full range of cranes used by potential employers. In this sense the site-specific content is not transferable. However, what is more important for transferability of the qualification is content that develops;

- the essential generic underpinning knowledge and skills needed to enable the student to achieve the more specialised knowledge and skills required to perform a job to the standards required by their employer;
- the participant's understanding of the broad features and requirements of job type they are seeking; and
- the ability to adapt and apply their existing skills and knowledge as needed for a particular work place.

These are the essential generic skills needed to enable the student to quickly learn and adapt to the new site-specific requirements when they gain employment or change jobs.

Where companies feel it necessary, they have begun to test again for vocational "verification of competence" (VOC) when people come to site – both in the sense of testing new employees of their own, and contractors coming to site. As an industry of contractors, the qualification is a valuable means of proving that we are competent. This process has started to 'second-guess' that again.

## 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:

See also comments at Qu 1.

The drilling industry does the vast majority of training at site and in house in companies. The RII qualifications for drilling require that at site assessment occur, and where possible (and in most larger companies) this is done by a mechanism of in-company assessors. (For the ADITC RTO these assessors are formally registered with the RTO, and non-company assessors are personnel currently working in or immediately from the drilling industry).

The drilling industry values a flexible regulatory framework for VET that encourages the design and delivery of training and assessment services customised to meet the needs of individual students and employers. However, within this flexible framework all RTOs must demonstrate compliance with the agreed minimum quality standard for the assessment of competency, irrespective of how the competency was developed. Confidence in the quality of training outcomes for competency-based training is built upon confidence in the validity of the training provided to personnel and the assessment processes used to confirm the required competency has actually been achieved.

The current VET regulatory framework focuses excessive time and resources on the detailed audit of training input documentation on the assumption that compliance here will result in quality training outcomes. This approach has clearly not worked and is cumbersome where much training is delivered in company on cooperation with the RTO.

We believe that the regulatory framework needs to change its focus onto ensuring compliance with agreed performance standards for competency assessment if it is to be more effective in ensuring the quality of VET outcomes.

Industry certainly knows and understands what knowledge and skills are required for an efficient and effective workforce. However, this is essentially a human resource management expertise typically applied to the development of accurate duty statements, work instructions and related documentation, and the monitoring and measurement of employee job performance.

## 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:

High risk in what sense? If work-based high risk:

There were existing processes around high risk training, assessment, licensing and so on. There was an attempt to harmonise these with the qualification structure which was overlaid and we now have a muddle between the two.

There are current national approaches to harmonising this.

## 10. Discussion questions – industry expectations and graduate capabilities:

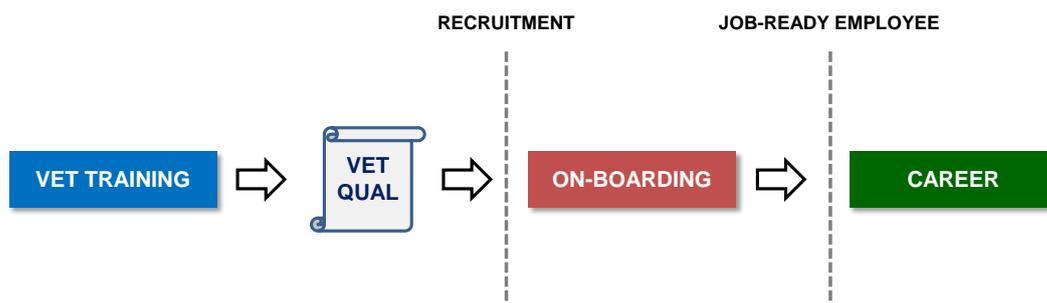
- Is there a role for Government or industry to develop resources outlining VET graduate expectations for particular training products? If so, who should take this work forward?
  - Do higher order issues need to be resolved regarding terminology such as ‘competent’ (as assessed against the training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

### COMMENT:

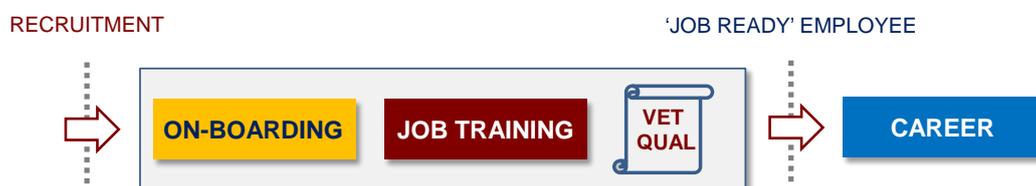
**This quotes well-stated information from ERTOA with which we are in agreement:**

#### **The myth of ‘job-ready’ VET graduates’**

ERTOA members have a common view that many employers have an unrealistic expectation that a VET graduate completing a qualification will be job-ready and immediately effective in performing their job upon recruitment. In reality employees are not job-ready at the point of recruitment. New recruits will require additional training to learn how to operate the specific equipment associated with their job, to understand and follow the business processes of their new employer and absorb the business culture. It is this induction/‘on-boarding’ training that finally results in a job-ready employee.



The following diagram illustrated the training model commonly implemented by ERTOs. In this model a new employee develops the knowledge and skills required to perform their assigned job role via a post-recruitment training program. The associated qualification is only issued after the employee have demonstrated competency in performing their assigned job role in the workplace to the standards specified in the Training Package and required by the employer.



The experience of ERTOA members strongly suggests that many employers expect the VET training provider to deliver the ‘on-boarding’ training as part of the qualification, and when this does not happen they often express dissatisfaction with the quality of the training and/or VET graduate. This dissatisfaction also leads to pressure from more influential employers and their associations for the inclusion of additional site-specific content in the Training Package to effectively customise it for their own particular needs. In our view this tendency towards

increasingly prescriptive site-specific content has contributed to the complexity and inflexibility that now characterises most Training Packages. ERTOA has consistently argued that the concept of a constructing qualifications in two parts should be actively investigated – the two parts are:

- Generic content – nationally recognised and transferable across employers
- Site-specific content – nationally recognised but non-transferable across employers

Such an approach would have immediate impact upon the design of processes for the validation of assessment systems.

## 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:**

Isn't it ASQA's role to manage and enforce the Standards for RTOs?

## 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.