Australian Government

Department of Education and Training

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

Key consultation areas

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

Chapter 1: Foundation reforms

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

Chapter 2: Reforms to the assessment of VET students

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

Chapter 3: Reforms to the regulatory framework

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

How to provide feedback

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

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

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

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

Submission details

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

2. Full name:

Prepared by: Wendy Blair, Director

3. Organisation (if applicable):

Australian Hairdressing Council

4. Please indicate your interest in this discussion paper:

Peak Body

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

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

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

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

- 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? NO – but only with clear evidence that their trainers went through the same as any student

- 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:

The TAE qualifications or skillsets should be delievered by RTOs that are clearly dedicated to training and education, e.g. TAFE's and some excellent private prviders with a reputation for delivery of quality training in TAE. Newcomers should be given a year of delivery to prove themselves. Their graduates' feedback should be considered when determining if they are suitable to continue offering the qualification.

RTOs should be able to deliver to their own staff, but only with clear evidence that their staff went through the same as any student.

Rigour is always arguable in this qualification for delivery, assessment and RPL. I agree that RPL may miss their total capability across the intention of the qualification. As the VET sector changes frequently, doing the course again would always include additional knowledge and skills.

The training assessment skills should practiced on real work in an RTO – evidence should include what a trainer is currently training and assessing students on, with a workplace visit where possible. References, videos and other evidence is not arduous enough – if it was, we would not have the trouble we are having with trainers and assessors.

TAE training should only be delivered by dedicated VET professionals with a minimum of 5 years of training and assessing in a broad range of contexts

Most VET professionals wth a long career in VET have a degree in Adult Education, this should be the minimum standard

The TAE CIV needs a practical component, to clearly demonstrate the student's ability to deliver, facilitate, assess and assist students *in the vocational context.* The best training for trainers is the 'how to apply these skills in your vocational area'. Professional associations could be a source of industry related Qualification and Training Package specific advice

The entrance to the TAE Diploma must have worked in the industry for at least 5 years (FTE). Assessment would then meet industry benchmarks and needs, as well as Training Package requirements, with a reasonable amount of time in the VET industry.

The current quality of the TAE is appalling, with only some successes. Most RTOs – after sending their staff to do the qualification, or upgrade – spend months teaching them what they need to know. The TAE is a flimsy basis on which to develop vocational competencies and qualifications for industries which underpin the national economy.

It is most often treated as a 'must have' rather than a value to the trainer and assessor or to the RTO for whom they work.

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:

The TAE should not be a pre-requisite for training and assessing. Three months (minimum 20 hpw) working with an experienced trainer and assessor should be the pre-requisite to enrolling in a TAE. Or a traineeship. One cannot learn from a course all that is required to be a trainer and assessor. Working on the job is a far better teacher and also gives the student a context for the knowledge provided by the TAE. Pre-learning some could be preparatory, co-learning is ideal.

Designing assessment tools and systems is a separate skillset that not all assessors will have, so no, *TAEASS502B Design and develop assessment tools* should NOT be a core unit. A new unit on what makes an assessment task/system work and how to assess, rather than how to design an assessment would be better.

With regard to making updates to the TAE, majority considerations can often have many misinformed or self-interest opinions. Key stakeholders and the nature of the argument should be the key considerations.

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:

A professional association is needed that provides ongoing training, (CPD), where credit points are awarded for this training and others as presented to the association. A minimum number of points must be achieved annually to remain current.

The establishment of a professional association has been researched and discussed for many years. The ownership of the association has always been contentious – and highly competitive.

A framework for an association needs to be set – a working party of researchers, competitors and industry associations to develop.

Then funding should begin, although the association should be self funded within five years.

The purpose is to maintain a professional standard, though provision of training in current knowledge and interpretation of changes. Benchmarks for trainers and assessors.

- 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:

Yes to all of the proposals above.

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

I believe there are a number of levels for trainers and assessors and these should be recognised in the framework, as in the Educational Services (Post-Secondary Education) Award 2010

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

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

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

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

COMMENT:

Model A is the only model that can provide all that is needed to the VET industry.

The value of a VET professional association would be seen in the outcomes for students facilitated by those meeting the capability framework benchmarks.

The association would provide a one stop shop for assistance or guidance for all trainers and assessors. It would also benefit auditors to clarify any grey areas in auditing (industry-based grey areas).

All teachers must belong to the association, as well as belonging to their industry association (if there is one).

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 capability frameworks developed should be utilised to define training and assessing capabilities, in literacy, numeracy and vocational skills. The IBSA developed framework goes a long way towards doing this.

Each industry could work to define what they need in trainers and assessors, using the frameworks – with help from the VET association elected expertise.

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<tr><td>**7.**   **Discussion questions – increasing industry confidence:**</td></tr>
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- 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:

A project to develop assessments should be funded across a number of industries as a pilot – to be rolled out when success is achieved.

Assessment systems/tasks/tools should be developed by the vocational industry (possible through the vocational industry association with education and training expertise) in conjunction with the VET association elected expertise.

Each RTO is then required to contextualise these to their cohort and location – but they remain the basis on which a person is found competent. This would provide a more rigorous benchmark for assessment.

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

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

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

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

- 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:

Industry involved in validation should include other RTO staff (from a non-competitor, could be from another state) and industry practitioners.

Industry does not necessarily have the capacity, but it is up to each RTO to help develop that capacity as part of their industry engagement. Industry is keen to be involved as they see the results of what they often regard as poor decisions in assessment.

Industry Associations may have the capacity, although there are so many varied types of industry associaions, this needs to be defined to only include those that includes and aeducation and training 'expert' and portfolio within their constitution/board structure.

I believe that government does not need to develop this capacity.

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:

A validation guide with templates needs developing (there used to be one in the 1990's) which is clear on intent and how to use – this must be completed on a sample – say 30% of each qualification.

The notion of 'licencing' or capstone tests as applies in the Electrical trades industry in NSW, are an excellent idea, but only if they are renewed avery 3-5 years. Some qualifications may not require the same rigorous testing, but potentially an 'ethics' or problem solving test may be more appropriate. Some training is so non-specific that it would be difficult to assess as the training may have led to employment, but not clearly related to what they are doing 3 years later. Industry associations should determine what they want assessed and re-assesssed.

Re-assessments, if deemed necessary, should be on the entire co-hort, but at a holistic level.

Re-assessments should be done by expert assessors including industry members.

There are no experts in assessments across all industries.

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:

SSO's in conjunction with specific industry associations and networks should develop the resources to better inform industry. The terminology needs to be further explained and contextualised to each industry to ensure the undustry expectations are commensurate with the AQF and qualification intention.

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:

The audit authority should have the ability to assess the outcomes for graduates – were they employable, did they get a job (only if they applied for some), did they keep their job (why, why not?). Direct student feedback to audit authority – what they think of their college. This way it avoids being a complaints driven system. Many people will not make a complaint once they have completed, but if the feedback loop was compulsory (with an opt-out option after logging on) prior to the issuance of a qualification, auditors would hear a lot more!

Suggestion: an online feedback loop (tied to their USI) with questions measuring their opinion of the quality of training, facilities and equipment, assessment, trainers, job-readiness, success in gaining employment; an opt-out could be the first option. Include a comments section as well.

Maintaining assessments for a longer period will achieve nothing. If a student is going to complain, it will be soon after graduation, or not at all.

Assessment outputs should be monitored by ASQA, through an industry association and network feedback loop. This could be a simple 3 or 4 question online survey with the option for additional comments.

- 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:

My comments above also relate to these discussion points also:

The audit authority should have the ability to assess the outcomes for graduates – were they employable, did they get a job (only if they applied for some), did they keep their job (why, why not?). Direct student feedback to audit authority – what they think of their college. This way it avoids being a complaints driven system. Many people will not make a complaint once they have completed, but if the feedback loop was compulsory (with an opt-out option) prior to the issuance of a qualification, auditors would hear a lot more!

Suggestion: an online feedback loop (tied to their USI) with questions measuring their opinion of the quality of training, facilities and equipment, assessment, trainers, job-readiness, success in gaining employment; an opt-out could be the first option. Include a comments section as well.

Assessment outputs should be monitored by ASQA, through an industry association and network feedback loop. This could be a simple 3 or 4 question online survey with the option for additional comments.

Inadequate assessment, when identified, should be corrected within a reasonable timeframe. No penalty…until the 2nd time. Then on notice, followed by an audit of all assessments. If assessments are still inadequate then at the audit, training only, and they must arrange an external assessment, for the next 12 months. Then review.

All RTOs should be treated the same – regardless of size or number of students.

All RTOs with special conditions still to be published, after the RTO has been notified with a 7 day right of reply (no further changes/improvements can be accepted at this stage).

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:
Cancelling qualifications hurts the graduate, not the RTO. The RTO should pay for re-assessment and any remedial training required and re-assessment again. This needs to be handled carefully as it could be open to abuse. The external assessor cannot recommend an RTO for remedial training.

Reassessment:

If a students is guilty of serious fraud they should not be given the opportunity for re-assessment

Re-assessment should take place prior to cancellation of the qualification, although if safety is an issue, suspension is an option, until re-assessment can take place. If the financial situation is impossible, then the Tuition Assurance Scheme should fund it.

The RTO at fault should bear the cost of re-assessment and gap training

Re-assessment should never be by the RTO at fault. An industry person with another *compliant* RTO should re-assess.

Industry member should be present; the qualifications of the assessor should be as prescribed in the Training Package.

Tuition Assurance Scheme (TAS) should be extended to include the scenario of re-assessment and gap training to the value of the qualification. Membership of TAS or bank guarantee to the equal amount should be mandatory.

If the student is eligible for Austudy or other benefits, they should receive it, regardless of whether the student has graduated and needs further training in the same qualification.