



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 Yes No website or otherwise be made publicly available?
 - 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:

Targeting the skills of the assessors is not the real issue.

The issue of poor quality assessing comes from market pressures. As there is no mandated length of courses the market determines the duration of courses. The shorter the course the less time to teach real skills and ultimately inadequate time to conduct thorough assessments. The outcome is a loss of high quality providers and a market filled with low quality.

This also applies to the delivery durations for TAE as well which ultimately impacts on the quality of trainers and assessors.

On-line training also is partly to blame as for many tactile industries the skills cannot be learnt at a computer screen.

Ultimately the answer is to specify minimum mandated course duration. If a person has existing skills and knowledge, then a thorough RPL process can be applied and greater than the minimum can be applied. However allowing the market to set course durations is the key to poor quality assessments and lack of industry skills and knowledge by students.

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:

Trainers and Assessor generally are not involved heavily with assessment development. However, those that do develop are not required to hold any TAE qualifications. Therefore, making changes to the TAE will have little effect on assessment development. However, in saying this the validation requirements of the new Standards for RTOs ensures subject matter experts are involved.

It would be worth considering mandated qualifications for assessment tool developers.

In the case of decision making it is imperative that vested interests do not over ride the required outcome. Key stakeholder groups tend often to be swayed by vested interest.

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:

Yes, it would have merit - however there are already non-funded organisations such as ACPET and various other trainer/assessor associations such as Transnet. These groups could all be brought together. The difficulty is that many of these organisations currently focus mainly upon assisting RTOs to maintain compliance to the Standards for registered training organisations. This current compliance system is highly based upon documentary evidence. ASQA's auditing process is based on this evidence so the focus of RTOs is on how to ensure the paperwork is right.

There is little or no actual auditing of assessing processes at training venues or in the field.

The most useful guiding purpose would be to provide a force to move the VET sector that is not market driven. Whilst the market drives the VET sector, prices are clearly under pressure however costs are not. Therefore the most variable components are:

- Course duration.
- Numbers of students into classes.

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:

The Australian Council for Private Education and Training is a good example of such an organisation. They do many of the above items other than registering VET practitioners. Their role is highly focused on providing professional development and assisting RTOs in their compliance responsibility. It is however quite expensive to maintain membership at the various levels they offer. This is a barrier. Government funding to allow such an organisation to function at little or no cost to members would provide benefit to all.

However again as an organisation they do not address issues that drive the private education market. Market pressures need to be removed to allow quality training to come forward.

The role has to be national. RTOs need to operate on a national basis to be able to off-set the costs of maintaining registration. Therefore breaking down the barriers of borders is essential.

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:

From the point of view of industrial skills training such as forklift, scissor lift, heights training and so on, the units of competence are far too rigid to allow adaptation to any individual site application. RTOs are so rigidly mandated to follow the criteria of the unit it is often necessary for students to be taken out of their workplace to undertake training.

AITA would support industry-endorsed, externally administered assessments. At the moment every RTO must develop their own assessment resources. Thus huge variability. External assessments such as the High Risk Work licence assessments would at least provide consistency. These are administered by a Government agency – Safe Work Australia. Industry engagement however would be critical to ensure the assessments meet the need of industry. This is where the High Risk Work licence assessments require further work.

By externally administered test does this mean setting up a testing body? That sounds overly complex and completely removed from the concept of a competency based system. However, removing the trainer from the assessing process does have merit.

Not sure there is a benefit in making test results public.

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:

People work for industry. This is the relationship that needs to be involved with assessment validation. Outside of this is vested interest groups that will skew the process.

Employers and Industry groups do not have the skills required for validation in general. The process is complex and time consuming. The skills can be generated however this issue is the time involved.

The current validation process is crippling to RTOs in terms of time required and cost.

To build this capacity externally a dedicated industry group would be required. However, would this group really validate every assessment for every unit of competence for every RTO? Certainly it would appear that a common assessment, validated by industry, for each unit would be a more efficient solution.

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:

Most of this is already covered above.

The current systems of RTOs developing their own assessments based upon the current release of the Unit of Competence is designed to ensure there is no one size fits all approach. Industry consultation is required to be undertaken as part of the RTO's responsibilities under the current standards. So in that regard the current system should work.

However, the RTOs are restrained by the unit of competence requirements and the validation does not require industry input.

The validation process requires review.

10. Discussion questions – industry expectations and graduate capabilities:

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

COMMENT:

No there does not appear to be a common understanding of VET system outcomes.

The biggest issue is the ASQA auditing process. Too highly paper based. As indicated above the audit process needs to be at the ‘coal face’ not in the RTO’s office.

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:

Yes, student outcomes need to be more the focus.

Holding records longer is only historical evidence. The focus needs to shift away from the 'audit industry' to ensuring the knowledge and skills meet industry requirements.

Training only RTOs may be part of the answer however not financially viable one would suspect.

The mechanisms desperately required are:

A) Reintroduction of minimum training hours.

B) Limit number of students per class or per trainer (ratio).

Government-funded courses need to be evaluated as to whether the course fees are in line with the historical user pays fees of the RTO for the same course. Funded RTOs tend to charge higher fees once Government funding is granted. This disadvantages non-funded RTOs and creates market chaos once the funding is removed. The funded RTO then has to scramble to recover the inflated lost revenue.

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:

There are heavy enforcement penalties now. Again the focus needs to be on the outcomes and having regulators in the field. For example, SafeWork NSW has a very comprehensive random field audit process for High Risk Work licence assessing. At any time an inspector may attend assessments in the field without notice. This ensures a rigorous and consistent assessment outcome in most cases.

Size of RTOs? Is small good or big good? Really quite irrelevant however it is said that small RTOs may have financial viability issues. However, it is not the small RTOs that have been sent bankrupt in recent times. Nor is it the small RTOs that are being prosecuted for illegal activity.

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:

YES.

However, the guidelines for assessment are not clearly defined in the unit. They are left to the RTO to interpret.

Effective RTOs can manage re-assessment. It is expected that there will be some persons requiring re-assessment as they were not competent. Not every student can be competent. Gap training and then re-assessment is a normal part of RTO activity.

It would appear that the intent of this question is more based around fraudulent assessment activity. There is no field auditing currently so how will fraudulent assessment be uncovered? This returns to the recommendations above.

With any new system such as a tuition assurance scheme comes additional cost. If the RTO has to bear the cost it will be passed on to students.

Again if the qualification is fraudulent then the RTO should bear all costs including re-assessment.